COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

DuPont Teijin Films
3600 Discovery Drive
Chester, Virginia
Permit No. PRO-50418

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, DuPont Teijin Films has applied for a Title V Operating Permit for its Chester, Virginia facility. The Department has reviewed the application and has prepared a draft renewal Title V Operating Permit.

Engineer/Permit Contact: _____ Date: 9/22/2016
Ashby R. Scott
(804) 698-4467

Air Permit Manager: _____ Date: 9/23/2014
James E. Kyle, P.E.

Deputy Regional Director: _____ Date: 9/28/16
Kyle I. Winter, P.E.

FACILITY INFORMATION

Permittee
DuPont Teijin Films
3600 Discovery Drive
Chester, Virginia 23836

Responsible Official
Mark Allen
Plant Manager

Facility
DuPont Teijin Films
3600 Discovery Drive
Chester, Virginia 23836

Contact Person
Jennifer Forstner
(804) 530-9844

County-Plant Identification Number: 041-00073

SOURCE DESCRIPTION

NAICS Code: NAICS 326113- Film, plastics (except packaging), manufacturing and NAICS 325211 Polyethylene-terephthalate (PET) resins manufacturing. DuPont Teijin Films Division operates a polymer film manufacturing facility in Chesterfield County, Virginia which produces polyester, PET, film as a final product which is used in many diverse applications. The manufacturing operations are divided into two distinct areas, a polymer plant and a film plant. PET polymer is produced in four separate batch process lines in a two-step batch reaction by the terephthalic acid (TA) process at the polymer plant. The film plant is comprised of seven unique film lines labeled Film Lines 40 and 42 through 47. The basic process for each line is similar, manufacturing bulk polyester film rolls from virgin polymer chip, but there are key differences in equipment and equipment capacity which allow different products to be run on each line.

The facility is a Title V major source of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). This source is located in an attainment area for all pollutants minor. The facility is currently permitted under a Minor NSR Permit issued on May 28, 2014 and amended on February 10, 2016. The initial Title V permit for the facility was issued on December 29, 2004 and the renewal application was received on June 29, 2009.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

The last full compliance evaluation of the facility was conducted on June 10, 2015. The facility was found to be in compliance with all permit conditions.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment - Boilers							
1001	1001	Cleaver Brooks Model DL52E distillate oil/natural gas-fired boiler	51 MMBtu/hr	N/A	N/A	N/A	N/A
1002	1002	Cleaver Brooks Model DL52E distillate oil/natural gas-fired boiler	51 MMBtu/hr	N/A	N/A	N/A	N/A
1003	1003	Cleaver Brooks Model DL48E distillate oil/natural gas-fired boiler	47 MMBtu/hr	N/A	N/A	N/A	2/25/1988
1004	1004	Struther-Wells distillate oil/natural gas-fired Dowtherm heater	14 MMBtu/hr	N/A	N/A	N/A	N/A
1005	1005	Struther-Wells distillate oil/natural gas-fired Dowtherm heater	14 MMBtu/hr	N/A	N/A	N/A	N/A
Fuel Burning Equipment - Engines							
1007	1007	East Fire Water Pump (Cummins Diesel - installed 1971)	340 hp	N/A	N/A	N/A	N/A
1008	1008	West Fire Water Pump (Cummins Diesel - installed 1971)	340 hp	N/A	N/A	N/A	N/A
1009	1009	North Fire Water Pump (Cummins - installed 1995)	340 hp	N/A	N/A	N/A	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
1010	1010	Emergency Generator (Kohler model 15ROY61 - installed 2003)	27.4 hp	N/A	N/A	N/A	N/A
Polymer Plant Process Equipment							
0101	0100	**L1 Polymer Plant** (consisting of two-stage polymer reactor system with demister, including but not limited to one EI batch reactor (with a total operating vapor space of 190 cubic feet), one capacity vessel, one methanol/ethylene glycol distillation column, one autoclave batch reactor, and two condensers/heat exchangers)	1000 gals/batch (raw materials)	Polymer Lines 1-4 Scrubber	0100	VOC, HAP	2/10/2016
0102	0100	**L2 Polymer Plant** (consisting of two-stage polymer reactor system with demister, including but not limited to one EI batch reactor (with a total operating vapor space of 190 cubic feet), one capacity vessel, one methanol/ethylene glycol distillation column, one autoclave batch reactor, and two condensers/heat exchangers)	1000 gals/batch (raw materials)	Polymer Lines 1 - 4 Scrubber	0100	VOC, HAP	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
0103	0100	**L3 Polymer Plant** (consisting of two-stage polymer reactor system with demister, including but not limited to one EI batch reactor (with a total operating vapor space of 190 cubic feet), one capacity vessel, one methanol/ethylene glycol distillation column, one autoclave batch reactor, and two condensers/heat exchangers)	1000 gals/batch (raw materials)	Polymer Lines 1 - 4 Scrubber	0100	VOC, HAP	2/10/2016
0104	0100	**L4 Polymer Plant** (consisting of two-stage polymer reactor system with demister, including but not limited to one EI batch reactor (with a total operating vapor space of 190 cubic feet), one capacity vessel, one methanol/ethylene glycol distillation column, one autoclave batch reactor, and two condensers/heat exchangers)	1000 gals/batch (raw materials)	Polymer Lines 1 - 4 Scrubber	0100	VOC, HAP	2/10/2016
0110	Fugitive	One (1) Hotwell	12,300 gallons	N/A	N/A	N/A	N/A
0115	0115	L1 Polymer Chip Blender	1.25 tons/hr	Baghouses, Young Industries 3353	0115	PM	N/A
0116	0116	L2 Polymer Chip Blender	1.25 tons/hr	Baghouses, Young Industries 3353	0116	PM	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
0117	0117	L3 Polymer Chip Blender	1.25 tons/hr	Baghouses, Young Industries 3353	0117	PM	N/A
0118	0118	L4 Polymer Chip Blender	1.25 tons/hr	Baghouse, Flex-Kleen 58-CT-14-III	0118	PM	2/10/2016
0119D	0119D	L4 Polymer Hold Up Hopper	1.25 tons/hr	Baghouse, Flex-Kleen 58 CT 18 III	0119D	PM	2/10/2016
0120	0120	One (1) Polymer Plant Process Contact Cooling Tower	600 gallons per minute	N/A	N/A	N/A	N/A
0122	0122	Multi-use Storage Tank (Crude EG/Wastewater)	13,000 gallons	N/A	N/A	N/A	2/10/2016
0123	0123	Multi-use Storage Tank (Crude EG/Wastewater)	13,000 gallons	N/A	N/A	N/A	2/10/2016
0126-0128	0126-0128	Three (3) Crude Glycol Tanks	21,300 gal each	N/A	N/A	N/A	2/10/2016
0151, 0152	0151, 0152	Two (2) Ethylene glycol stills and associated ejector vents	5,000 gal each	Non-contact condensers	0151, 0152	VOC	N/A
0190	Fugitive	Polymer Plant Equipment Leak Components	N/A	N/A	N/A	N/A	N/A
0191	Fugitive	Dowtherm Equipment Leak Components	N/A	N/A	N/A	N/A	N/A
1028	Fugitive	One (1) Effluent pit	18,000 gallons	N/A	N/A	N/A	N/A
1029	Fugitive	One (1) Collection Sump	3,800 gallons	N/A	N/A	N/A	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
1051	1051	One (1) Main Cooling Tower	15,700 gallons per minute	N/A	N/A	N/A	N/A
1061	Fugitive	One (1) Equalization Basin	180,000 gallons	N/A	N/A	N/A	N/A
1062	Fugitive	One (1) Bio-treatment Plant(Two Aeration Basins; 220,000 gallons each)	440,000 gallons	N/A	N/A	N/A	N/A
Railroad Car Chip Unloading Operations							
2040	2040a	No. 1Railroad Car Chip Unloading Station	7.5 tons/hr	Baghouse, Ultra Industries #CB-24-84-ARR III	2040a	Particulate	2/10/2016
	2040b			Baghouse, Flex-Kleen 84CTBC	2040b		
2041	2041	No. 2 Railroad Car Chip Unloading Station	7.5 tons/hr	Baghouse, Ultra Industries #CB-24-84-ARR III		Particulate	2/10/2016
Virgin Chip Bunkers							
2001	2001	Virgin Chip Bunker #1	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2002	2002	Virgin Chip Bunker #2	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2003	2003	Virgin Chip Bunker #3	7.5 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
2004	2004	Virgin Chip Bunker #4	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2005	2005	Virgin Chip Bunker #5	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2006	2006	Virgin Chip Bunker #6	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2007	2007	Virgin Chip Bunker #7	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2008	2008	Virgin Chip Bunker #8	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2009	2009	Virgin Chip Bunker #9	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2010	2010	Virgin Chip Bunker #10	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2011	2011	Virgin Chip Bunker #11	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2012	2012	Virgin Chip Bunker #12	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2013	2013	Virgin Chip Bunker #13	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2014	2014	Virgin Chip Bunker #14	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2015	2015	Virgin Chip Bunker #15	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2016	2016	Virgin Chip Bunker #16	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2017	2017	Virgin Chip Bunker #17	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2018	2018	Virgin Chip Bunker #18	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2019	2019	Virgin Chip Bunker #19	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2020	2020	Virgin Chip Bunker #20	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2021	2021	Virgin Chip Bunker #21	7.5 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
2022	2022	Virgin Chip Bunker #22	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2023	2023	Virgin Chip Bunker #23	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
2024	2024	Virgin Chip Bunker #24	7.5 tons/hr	N/A	N/A	N/A	2/10/2016
Film Line 40 – L40							
4001	4001	L40 Virgin Head Hopper Cyclone	11.3 ton/hr	N/A	N/A	N/A	2/10/2016
4002	4002	L40 Virgin Head Hopper Vent	11.3 ton/hr	N/A	N/A	N/A	2/10/2016
4003	4003	L40 Reclaim Head Hopper Cyclone	11.3 ton/hr	N/A	N/A	N/A	2/10/2016
4004	4004	L40 Reclaim Head Hopper Vent	11.3 ton/hr	N/A	N/A	N/A	2/10/2016
4005a	4005a	L40 Master Batch Head Hopper #1 Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4005b	4005b	L40 Master Batch Head Hopper #1 Vent	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4006a	4006a	L40 Master Batch Head Hopper #2 Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4006b	4006b	L40 Master Batch Head Hopper #2 Vent	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4011	4011	L40 Crystallizer Filter Receiver	1.75 tons/hr	Baghouse, Young Industries 8813	4011	Particulate	2/10/2016
4012	4012	L40 Main Dryer System	1.75 tons/hr	Baghouse, Flex Kleen	4012	Particulate	2/10/2016
4021	4021	L40 Casting Drum	1.75 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4031	4031	L40 Stenter Oven - Neutral Zone	1.75 tons/hr	N/A	N/A	N/A	2/10/2016
4032	4032	L40 Stenter Oven - Fume Exhaust	1.75 tons/hr	N/A	N/A	N/A	2/10/2016
4033	4033	L40 Stenter Oven - Clip Cooling Exhaust	1.75 tons/hr	N/A	N/A	N/A	2/10/2016
4034	4034	L40 Stenter 3rd Crystallizer	1.75 tons/hr	N/A	N/A	N/A	2/10/2016
4035	4035	L40 Stenter Cooling Zone	1.75 tons/hr	N/A	N/A	N/A	2/10/2016
Film Line 42 – L42							
4201a	4201a	L42 Virgin Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4201b	4201b	L42 Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4203a	4203a	L42 Reclaim Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4203b	4203b	L42 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4204	4204	L42 Master Batch Dryer Vacuum Loader Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4205a	4205a	L42 Master Batch Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4205b	4205b	L42 Master Batch Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4211	4211	L42 Main Dryer System - Rotary Type Chip Crystallization Dryer	1.25 tons/hr	N/A	N/A	N/A	2/10/2016
4212	4212	L42 Master Batch Dryer	1.25 tons/hr	N/A	N/A	N/A	2/10/2016
4221	4231	L42 Casting Drum	1.25 tons/hr	N/A	N/A	N/A	2/10/2016
4231	4231	L42 Stenter - Neutral Zone	1.25 tons/hr	N/A	N/A	N/A	2/10/2016
4232	4232	L42 Stenter - Fume Exhaust	1.25 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4261	4261a	L42 Air Classifier	1.25 tons/hr	Baghouse, Flex-Kleen 84CT-I8	4261a	Particulate	2/10/2016
	4261b			Baghouse, Young Industries	4261b		
4271	4271	L42/L43 House Vacuum System	0.009 tons/hr	Baghouse, Hoffman GS33481	4271	Particulate	2/10/2016
Film Line 43 – L43							
4301a	4301a	L43 Virgin Head Hopper #1 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4301b	4301b	L43 Virgin Head Hopper #1 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4303a	4303a	L43 Reclaim Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4303b	4303b	L43 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4304	4304	L43 Virgin Head Hopper #2 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4305a	4305a	L43 Co-extrusion Head Hopper #1 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4305b	4305b	L43 Co-extrusion Head Hopper #1 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4306	4306	L43 Co-extrusion Head Hopper #2	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4307	4307	L43 Co-extrusion Chip Convey System	1.25 tons/hr	Baghouse, Flex-Kleen 56 CTBS8 III	4307	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4308	4308	L43 Master Batch Head Hopper Vacuum Loader Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4309	4309	L43 Master Batch Dryer Vacuum Loader Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4311	4311	L43 Main Dryer System - Rotary Type Chip Crystallization Dryer	1.25 tons/hr	N/A	N/A	N/A	2/10/2016
4313	4313	L43 Co-extrusion Dryer System	1.25 tons/hr	Baghouse, Flex-Kleen 58BVBC-9 III	4313	Particulate	2/10/2016
4314	4314	L43 Main Extruder Vacuum Pump	2.5 tons/hr	Baghouse, Sprout Waldorn	4314	Particulate	2/10/2016
4322	4322a	L43 Casting Drum	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
	4322b	L43 Casting Drum Air Horn Exhaust		N/A	N/A	N/A	
4331	4331	L43 Stenter Oven - Clip Cooling Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4332	4332	L43 Stenter Oven – 1st Preheat	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4333	4333	L43 Stenter Oven - Neutral Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4334	4334	L43 Stenter Oven - Fume Exhaust	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4335	4335	L43 Stenter Oven - Cooling Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4372	4372	L43 House Vacuum System	0.006 tons/hr	Baghouse, Hoffman HPC 10-58	4372	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
Film Line 44 – L44							
4401	4401	L44 Virgin and Reclaim Head Hoppers Cyclone System	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4402	4402	L44 Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4403	4403	L44 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4404a	4404a	L44 Co-Extrusion Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4404b	4404b	L44 Co-Extrusion Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4405a	4405a	L44 Master Batch Head Hopper #1 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4405b	4405b	L44 Master Batch Head Hopper #1 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4406	4406	L44 Air Classifier	11.3 tons/hr	Baghouse, Flex-Kleen 100-WSBS-100 IIIG	4406	Particulate	2/10/2016
4407a	4407a	L44 Master Batch Head Hopper #2 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4407b	4407b	L44 Master Batch Head Hopper #2 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4408a	4408a	L44 Master Batch Head Hopper #3 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4408b	4408b	L44 Master Batch Head Hopper #3 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4409a	4409a	L44 Master Batch Head Hopper #4 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4409b	4409b	L44 Master Batch Head Hopper #4 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4411	4411	L44 Main Dryer System	2.05 tons.hr	Baghouse, Flex Kleen 58-CT-14-III	4411	Particulate	2/10/2016
4412	4412	L44 Co-extrusion Dryer System	2.05 tons.hr	Baghouse, Flex Kleen 58CTBC-8-III	4412	Particulate	2/10/2016
4422	4422	L44 Casting Drum	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4431	4431	L44 Stenter - Preheat Make-up Exhaust	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4432	4432	L44 Stenter - Fume Exhaust	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4433	4433	L44 Stenter - Neutral Zone Exhaust	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4434	4434	L44 Stenter - Clip Cooling Exhaust	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4435	4435	L44 Stenter - 6th Crystallizer	2.05 tons.hr	N/A	N/A	N/A	2/10/2016
4461	4461	L44 Cutters	1.025 tons/hr	Baghouse, Flex-Kleen #100-WRC-144-III-G	4461	Particulate	2/10/2016
4474	4474	L44 Global Baghouse and House Vacuum System	0.021 tons/hr	Baghouse, Hoffman 40 x 166	4474	Particulate	2/10/2016
Film Line 45 – L45							
4500a	4500a	L45 Virgin Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4500b	4500b	L45 Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4502a	4502a	L45 Reclaim Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4502b	4502b	L45 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4504a	4504a	L45 Master Batch Head Hopper #1 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4504b	4504b	L45 Master Batch Head Hopper #1 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4505a	4505a	L45 Master Batch Head Hopper #2 Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4505b	4505b	L45 Master Batch Head Hopper #2 Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4506a	4506a	L45 Co-extrusion Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4506b	4506b	L45 Co-extrusion Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4507a	4507a	L45 Master Batch Head Hopper #3 Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4507b	4507b	L45 Master Batch Head Hopper #3 Vent	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4508a	4508a	L45 Master Batch Head Hopper #4 Cyclone	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4508b	4508b	L45 Master Batch Head Hopper #4 Vent	4.0 tons/hr	N/A	N/A	N/A	2/10/2016
4511	4511	L45 Main Dryer System	2.5 tons/hr	Baghouse, Flex-Kleen 58 CTBG 14 III	4511	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4512	4512	L45 Co-extrusion Dryer System	2.5 tons/hr	Baghouse, Flex-Kleen 58 BVBS-9 III	4512	Particulate	2/10/2016
4513	4513	L45 Master Batch Dryer System	2.5 tons/hr	Baghouse, Young Ind. VC60-9-32	4513	Particulate	2/10/2016
4514	4514	L45 Main Extruder Vacuum Pump	2.5 tons/hr	Cartridge Filter, SIDCO	4514	Particulate	2/10/2016
4522	4522a	L45 Casting Drum (no external vent)	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
	4522b	L45 Casting Drum Airhorn Exhaust		N/A	N/A	N/A	
4531	4531	L45 Stenter Oven - Fume and Neutral Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4532	4532	L45 Stenter Oven - Cooling Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4533	4533	L45 Stenter Oven - Clip Cooling Zone	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4534	4534	L45 Stenter Oven - Preheat Oven 1	2.5 tons/hr	N/A	N/A	N/A	2/10/2016
4561	4561	L45 Cutters	1.25 tons/hr	Baghouse, Flex-Kleen 84 WRB-64 IIIG	4561	Particulate	2/10/2016
4571	4571	L40/L45 House Vacuum System	0.011 tons/hr	Baghouse, Hoffman 30695	4571	Particulate	2/10/2016
Film Line 46 – L46							
4601a	4601a	L46 Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4601b	4601b	L46 Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4601c	4601c	L46 Master Batch Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4601d	4601d	L46 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4601e	4601e	L46 Co-extrusion Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4601f	4601f	L46 Co-extrusion Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4606	4406	L46 Air Classifier	11.3 tons/hr	Baghouse, Flex-Kleen 100-WSBS-100 IIIG	4406	Particulate	2/10/2016
4611	4611	L46 Main and Co-extrusion Dryer Systems	3.7 tons/hr	Baghouse, Flex-Kleen 58CT-14	4611	Particulate	2/10/2016
4621	4621	L46 Casting Drum	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4631	4631	L46 Stenter Oven - Preheat Oven Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4632	4632	L46 Stenter Oven - Fume and Neutral Zone	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4633	4633	L46 Stenter Oven - Clip Cooling Zone	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4634	4634	L46 Stenter Oven - Oven Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4661	4661a	L46 Cutters	1.85 tons/hr	Baghouse, Flex-Kleen No. 100 MRC-144	4661a	Particulate	2/10/2016
	4661b			Baghouse, Flex-Kleen 84 WRBC-48	4661b		

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4671	4671	L46 House Vacuum System	0.034 tons/hr	Baghouse, Hoffman 36 x 144	4671	Particulate	2/10/2016
Film Line 47 – L47							
4701a	4701a	L47 Virgin Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4701b	4701b	L47 Virgin Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4703a	4703a	L47 Reclaim Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4703b	4703b	L47 Reclaim Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4705a	4705a	L47 Master Batch Head Hopper Cyclone	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4705b	4705b	L47 Master Batch Head Hopper Vent	11.3 tons/hr	N/A	N/A	N/A	2/10/2016
4711	4711	L47 Main Dryer System	3.7 tons/hr	Baghouse, Sprout Bauer CB-14-58	4711	Particulate	2/10/2016
4712	4712	L47 Main Extruder Vacuum Pump	3.7 tons/hr	Baghouse, Flex-Kleen 08 CTBC 8 III	4712	Particulate	2/10/2016
4721	4721	L47 Casting Drum	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4732	4732	L47 Stenter Oven - Neutral Zone Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4733	4733	L47 Stenter Oven - 1st Preheat Oven Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4734	4734	L47 Stenter Oven - Cooling Zone Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4735	4735	L47 Stenter Oven - Clip Cleaning Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4736	4736	L47 Stenter Oven - 4th Crystallizer & 1st Cooling Zone Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4737	4737	L47 Stenter Oven - Clip Cooling Exhaust	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4738	4738	L47 Stenter Oven - Clip Debris Removal System	3.7 tons/hr	N/A	N/A	N/A	2/10/2016
4761	4761	L47 Cutters	1.85 tons/hr	Baghouse, Sprout Bauer RS-144-100	4761	Particulate	2/10/2016
4763	4763	L47 House Vacuum System	0.009 tons/hr	Baghouse, Hoffman 36 x 120	4763	Particulate	2/10/2016
Film Coating Systems							
4025	Fugitive	L40 Film Coating Application System (41 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016
4225	Fugitive	L42 Film Coating Application System (41 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016
4325	Fugitive	L43 Film Coating Application System (41 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016
4425	Fugitive	L44 Film Coating Application System (41 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016
4525	Fugitive	L45 Film Coating Application System (45 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
4625	Fugitive	L46 Film Coating Application System (80 inch)	30 gallons/hr	N/A	N/A	N/A	2/10/2016
4725	Fugitive	L47 Film Coating Application System (45 inch)	20 gallons/hr	N/A	N/A	N/A	2/10/2016
Primary Flake Bunkers							
6001-6004	6074	Primary Flake Bunkers #1 - #4	4.5 tons/hr	Baghouse, Young Industries 96 120	6074	Particulate	2/10/2016
	6078			Baghouse, Flex-Kleen 100 WRWC 80 III	6078		
6005	6005	Primary Flake Bunker #5	4.5 tons/hr	Baghouse, Flex-Kleen WRC 48M36 II	6005	Particulate	2/10/2016
6006	6006	Primary Flake Bunker #6	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6006	Particulate	2/10/2016
6007	6007	Primary Flake Bunker #7	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6007	Particulate	2/10/2016
6008	6008	Primary Flake Bunker #8	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6008	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
6009	6009	Primary Flake Bunker #9	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6009	Particulate	2/10/2016
6010	6010	Primary Flake Bunker #10	4.5 tons/hr	Baghouse, Flex-Kleen WRC 48M36 II	6010	Particulate	2/10/2016
6011	6011	Primary Flake Bunker #11	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6011	Particulate	2/10/2016
6012	6012	Primary Flake Bunker #12	4.5 tons/hr	Baghouse, Flex-Kleen 100 CT 64 II	6012	Particulate	2/10/2016
6013	6013	Primary Flake Bunker #13	4.5 tons/hr	Baghouse, Flex-Kleen WRC 48M36 II	6013	Particulate	2/10/2016
6014	6014	Primary Flake Bunker #14	4.5 tons/hr	Baghouse, Flex-Kleen WRC 48M36 II	6014	Particulate	2/10/2016
6015	6015	Primary Flake Bunker #15	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6015	Particulate	2/10/2016
6016	6016	Primary Flake Bunker #16	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6016	Particulate	2/10/2016
6017	6017	Primary Flake Bunker #17	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6017	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
6018	6018	Primary Flake Bunker #18	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6018	Particulate	2/10/2016
6019	6019	Primary Flake Bunker #19	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6019	Particulate	2/10/2016
6020	6020	Primary Flake Bunker #20	4.5 tons/hr	Baghouse, Flex-Kleen 100 CTBC 64 II G	6020	Particulate	2/10/2016
6021	6021	Primary Flake Bunker #21 (located at Film Line 45)	1.25 tons/hr	Baghouse, Ultra Industries CB 65 100 II G	6021	Particulate	2/10/2016
Intermediate Flake Bunkers							
6041	6041	Intermediate Flake Bunker #1	1.75 tons/hr	Baghouse, Flex-Kleen 100 CT 18 II	6041	Particulate	2/10/2016
6042	6042	Intermediate Flake Bunker #2	1.75 tons/hr	Baghouse, Flex-Kleen 100 CT 18 II	6042	Particulate	2/10/2016
6043	6043	Intermediate Flake Bunker #3	1.75 tons/hr	Baghouse, Flex-Kleen 100 CT 18 II	6043	Particulate	2/10/2016
6044	6044	Intermediate Flake Bunker #4	1.75 tons/hr	Baghouse, Flex-Kleen 100 CT 18 II	6044	Particulate	2/10/2016

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
6045	6045	Intermediate Flake Bunker #5	1.75 tons/hr	Baghouse, Ultra Industries CB 34 100 II G	6045	Particulate	2/10/2016
Scrap Bunker							
6051	6051	Scrap Bunker	1.75 tons/hr	Baghouse, Flex-Kleen 30 PCBL 24 II G	6051	Particulate	N/A
Flake Dryers							
6066 and 6073	6066	Flake Dryer #1 and #4	1.75 tons/hr	Baghouse, Flex-Kleen 84 BVBC 16 III G	6066	Particulate	2/10/2016
	6073			Baghouse, Young Industries VC 96 54 84 Style B	6073		
6067 and 6073	6067	Flake Dryer #2 and #3	1.75 tons/hr	Baghouse, Flex-Kleen 84 BVBC 16 III G	6067	Particulate	2/10/2016
	6073			Baghouse, Young Industries VC 96 54 84 Style B	6073		

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description **	PCD ID	Pollutant Controlled	Applicable Permit Date
6070	6070	Flake Dryer # 5	1.75 tons/hr	Baghouse, Flex-Kleen 84 BVBS 16 III	6070	Particulate	2/10/2016
Recycle House Vacuum Systems							
6071	6071	Recovery House Vacuum System	0.1 tons/hr	Baghouse, Hoffman GS 22052B	6071	Particulate	N/A
6072	6072	Pelletizing Flake and Chip House Vacuum System	0.1 tons/hr	Baghouse, Hi-Vac 840	6072	Particulate	N/A

EMISSIONS INVENTORY

A copy of the 2015 annual emission update is attached. Emissions are summarized in the following tables.

2015 Actual Emissions

2015 Criteria Pollutant Emission in Tons/Year					
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
Total	106.43	18.84	3.93	14.00	24.33

2014 Facility Hazardous Air Pollutant Emissions

Pollutant	2015 Hazardous Air Pollutant Emission in Tons/Yr
1,4-Dioxane (1,4-Diethyleneoxide)	1.50
Acetaldehyde	48.10
Biphenyl	1.63
Ethylene oxide	0.23
Ethylene glycol	0.72
Formaldehyde	2.13
Methanol	13.06
Hexane	0.39

EMISSION UNIT APPLICABLE REQUIREMENTS - Boilers, Dowtherm Heaters and Emergency Generators; (ID#s 1001-1005, 1007-1010)

Limitations

The 2/25/1988 NSR permit and the new and modified source visible emission standard from Chapter 50 of the Virginia regulations, 9 VAC 5-50-80, apply to boiler #1003. The Chapter 40 Existing Source Standards for Fuel Burning Equipment (Rule 4-8) and Visible Emissions (Rule 4-1) from Virginia's regulations apply to Boilers #1001 and #1002 and the two Dowtherm heaters. 40 CFR 63 Subparts A and DDDDD (Industrial Boiler MACT) apply to the three boilers and the two dowtherm units. 40 CFR 63 Subpart ZZZZ and Visible Emissions (Rule 5-1) apply to units #1007-1010.

1. Particulate matter and sulfur dioxide emissions from the Dowtherm heaters, #1004-1005, and the boilers, #1001-1002, are limited by Condition #1.

2. Condition #2 of the Title V permit limits visible emissions from boilers #1001-1002 and the Dowtherm heaters #1004-1005 to less than 20% opacity.

3. Annual fuel usage of natural gas and No. 2 fuel oil for boiler #1003 is limited by Condition #3.

4. Condition # 4 of the Title V permit limits particulate matter emissions from boiler #1003 while burning natural gas or No. 2 fuel oil.

5. Hourly and annual emissions of sulfur dioxide from boiler #1003 are limited by Condition # 5.

6. Hourly and annual emissions of nitrogen oxides from boiler #1003 are limited by Condition # 6.

7. Condition # 7 limits the approved fuels for boiler #1003 to natural gas and No. 2 fuel oil.

8. Sulfur content of No. 2 fuel oil to be burned in boiler #1003 is limited by Condition #8.

9. Visible emissions from boiler #1003 are limited by Condition #9 to no more than 20% opacity.

10. Compliance with the applicable work practice standards specified in 40 CFR 63 Subpart DDDDD for emission units #1001-1005 is required by Condition #10.

11. Compliance with all applicable requirements specified in 40 CFR 63, Subparts A and DDDDD for emission units #1001-1005 is required by Condition #11.

12. Visible emissions from engines #1007-1010 are limited by Condition #12 to no more than 20% opacity.

13. Condition #13 of the Title V permit outlines the maintenance and inspection schedule dictated by MACT ZZZZ for the emergency engines, #1007-1010, the minimization of emissions from startup, shutdown or malfunction events, as well as the requirement to install non-resettable hour meters on all the engines, if they do not have on installed already.

14. Use of the engines, #1007-1010, during emergency, maintenance and other use are limited by Condition #14.

15. Compliance with all applicable requirements specified in 40 CFR 63, Subparts ZZZZ for RICE units, #1007-1010 is required by Condition #15.

Monitoring

The EPA periodic monitoring guidance, dated September 18, 1998, requires periodic monitoring for each emission point at a source, subject to Title V of the Act, which is subject to an applicable requirement.

EPA has also stated that MACT (40 CFR 63) and NSPS (40 CFR 60) standards promulgated in the 1990s by default can be considered to include monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. Thus no additional periodic monitoring discussion is included for 40 CFR 63 Subpart DDDDD (Boilers and process heaters) and 40 CFR 63 Subpart ZZZZ (Emergency Generators).

The 1988 new source review permit has been reviewed and is determined to contain sufficient monitoring, recordkeeping and reporting provisions to qualify as periodic monitoring without additional requirements.

Exceptions to this were the opacity standard from the 2/10/2016 permit, the existing source Rules from Chapter 40 of Virginia's regulations (Rules 4-1 and 4-8), and Visible Emissions (Rule 5-1). Since there was no real monitoring provisions for these opacity requirements in the 2/10/2016 permit, an opacity observation schedule along with associated recordkeeping and reporting provisions were added as periodic monitoring for the equipment subject to the new/modified source opacity standard of 9 VAC 5-50-80 (boiler #1003, units #1007-1010) and the existing source opacity standard of 9 VAC 5-40-80 (boilers #1001-1002 and Dowtherm heaters #1004-1005). A monitoring protocol (only recordkeeping was required since the subject fuel burning equipment burn only natural gas and distillate oil) was developed and included in the Title V permit for the Chapter 40 fuel burning equipment requirements (Rule 4-8). For all

actual monitoring (i.e. opacity checks, monthly/annual inspections, etc.), records shall be kept to verify the occurrence and results of the monitoring. In addition, the source shall submit to the DEQ reports of any opacity observations which reveal visible emissions in excess of an applicable standard.

1. Visual emissions monitoring of each boiler, heater and engine, #1001-1005 and #1007-1010, is required at least once per operating month is required by Condition #16.

Recordkeeping

1. Records of all shipments of No. 2 fuel oil purchased, with an indication of the sulfur content of the fuel, for use in boiler #1003 is required to be maintained at the facility by Condition #17.

2. Condition # 18 requires records of all emissions and monitoring data to be kept at the facility in order to demonstrate compliance with the permit conditions.

3. Records of each notification and report submitted to comply with the requirements of MACT DDDDD are required by Condition #19

4. Records sufficient to document compliance with all applicable standards in MACT ZZZZ for engines #1007-1010 are required by Condition #20.

Reporting

1. Reporting of any Method 9 opacity test performed during the reporting period and any exceedance of the opacity standards set in the permit are required by Condition #21.

2. Annual compliance reports for the boilers and Dowtherm heaters to be submitted to EPA via CEDRI are required by Condition #22.

Polymer Plant Process Equipment; (ID# 0101-0104, 0110, 0116-0120, 0126-0134, 0139, 0151-0152, 0177 1027-1029, 1051, 1061-1062)

Limitations

The current limitations for the polymer plant process equipment were developed from the 2/10/2016 NSR permit; the May 30, 1996 RACT Agreement; the November 30, 1999 Consent Order; Chapter 40 Existing Source Standard for Storage Tanks from Virginia's regulations (Rule 4-25); and 40 CFR 63 Subparts A and JJJ (MACT standard for Group IV Polymers (PET) Manufacturing).

1. Condition #23 sets annual batch throughput limits for the crude glycol tanks, #0126-0128, and polymer reactor/demister systems #0101-0104.

2. Hourly and annual limits of volatile organic compounds (VOCs) for the crude glycol tanks, #0126-0128, and polymer reactor systems, #0101-0104, are set by Condition #24.

3. Condition #25 requires the use of non-contact condensers on the ethylene glycol stills vacuum systems, #0151-0152, to control VOC emissions.

4. A Leak Detection and Repair (LDAR) program to control fugitive VOC emissions from the polymer plant is required by Condition # 26.

5. A LDAR program to control fugitive Hazardous Air Pollutant (HAP) emissions from the polymer plant is required by Condition #27.

6. Condition #28 requires the polymer plant to be operated in compliance with all applicable requirements of 40 CFR Subparts A and JJJ in cases where the permit conditions are not more restrictive than the standard.

Monitoring

The EPA periodic monitoring guidance, dated September 18, 1998, requires periodic monitoring for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement.

EPA has also stated that MACT (40 CFR 63) and NSPS (40 CFR 60) standards promulgated in the 1990s by default can be considered to include monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. Thus no additional periodic monitoring discussion is included for 40 CFR 63 Subparts A and JJJ (Polymer Plant).

In addition, the other main sources of applicable requirements for the facility (the 2016 new source review permit, the 1996 RACT agreement and the 1999 Consent Order) have all been created since the CAAA in the 1990s. Review of these documents revealed that, in most cases, they included monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. For example, the 2016 new source review permit included extensive material throughput limitations and associated recordkeeping provisions.

Exceptions to this were the opacity standard from the 2/10/2016 permit and certain requirements from the 1996 RACT agreement (non-contact condensers) and the 1999 consent order (223.3 tons/yr VOC limit and VOC scrubber control). Also, the existing source Rules from Chapter 40 of Virginia's regulations (Rules 4-1 and 4-24) do not contain any specific or enforceable

monitoring requirements, so periodic monitoring was applied to these standards in the Title V permit.

Since there was no real monitoring provisions for the opacity requirement in the 2/10/2016 permit, an opacity observation schedule along with associated recordkeeping and reporting provisions were added. A monitoring protocol (throughputs, emission calculations and associated recordkeeping) was developed and included in the Title V permit for the Condition D.4 of the 1999 Consent Order. A monitoring protocol (annual inspections and associated recordkeeping) was developed and included in the Title V permit for the Condition E.3 of the 1996 RACT agreement and Condition D.6 of the 1999 Consent Order. For all actual monitoring (i.e. opacity checks, monthly/annual inspections, etc.), records shall be kept to verify the occurrence and results of the monitoring. In addition, the source shall submit to the DEQ reports of any opacity observations which reveal visible emissions in excess of an applicable standard.

Recordkeeping

1. Records to demonstrate compliance with Conditions #23 through #28 are required to be maintained by Condition #29, in addition to the records required by 40 CFR Subpart JJJ. Records of each Group 1 or 2 storage vessel showing the dimensions of the vessel and capacity will also be kept.

Reporting

1. Periodic reports, to be submitted on a semi-annual basis, are required to be submitted to the DEQ by the permittee in Condition #30. The reports will contain all information required by the applicable conditions to demonstrate compliance. In addition start up, shutdown and malfunction reports will be submitted on the same schedule as the periodic reports.

Additional Polymer Plant Process Equipment; (ID#'s 2040-2041, 2001-2024, 4001-4004, 4005a-4005b, 4006a-4006b, 4011-4012, 4021, 4031-4035, 4301a-4301b, 4303a-4303b, 4304, 4305a, 4305b, 4306-4309, 4311, 4313-4314, 4322, 4331-4335, 4372, 4401-4403, 4404a-4404b, 4405a-4405b, 4406, 4407a-4407b, 4408a-4408b, 4409a-4409b, 4411-4412, 4422, 4431-4435, 4461, 4474, 4500a-4500b, 4502a-4502b, 4504a-4504b, 4505a-4505b, 4506a-4506b, 4507a-4507b, 4508a-4508b, 4511-4514, 4522, 4531-4534, 4561, 4571, 4601a-4601b, 4601c, 4601d, 4601e, 4601f, 4606, 4611, 4621, 4631-4634, 4661, 4671, 4701a-4701b, 4703a-4703b, 4705a-4705b, 4711-4712, 4721, 4732-4738, 4761, 4763, 6001-6021, 6041-6045, 6066-6067, 6070, 6073)

Limitations

The film production lines limitations were developed from the 2/10/2016 NSR permit and 40 CFR 63 Subparts A and JJJJ (MACT standard for Paper and Other Web Coating)

1. PM emissions from the emissions units listed in the table in Condition #31 are required to be controlled by the by the equipment or by equivalent control equipment listed in the table. A device to continuously measure the differential pressure across each baghouse listed in Condition #31 is also required.

2. VOC emissions from the film coating lines (L40-L47) are controlled by the VOC content limit in the coatings used in Condition #32.

3. Annual throughput limits of chip, flake, film or batches for L40-L47, the Virgin Chip Bunkers, and Primary Flake Bunkers 1-21, #2040-2041, #6066-6070 and #6041-6045 are required by Condition #33.

4. Condition #34 sets annual throughput limits of VOCs for all film coating line operations, L40-L47.

5. Hourly and annual emission limits of PM, PM-10 and VOCs for L40-L47, the Primary Flake Bunkers, #6066-6070 and #6041-6045 are established in Condition #35.

6. Condition #36 requires visible emissions from each fabric filter listed in Condition #31 not to exceed 5% opacity.

7. Visible emissions from all other emission points not listed in Condition #36 are required by Condition #37 to not exceed 20% opacity.

8. Compliance with the emission standards in 40 CFR 63.3320(b)(2) or (b)(3) is required by Condition #38.

9. Demonstration of compliance with the emission standards in 40 CFR 63.3320(b)(2) or (b)(3) using several methods (buying "as-purchased" or "as-applied" complaint coating materials, or tracking total monthly HAP) is required by Condition #39.

10. Determination of HAP content and material coating solids content to demonstrate compliance with 40 CFR 63.3320(b)(2) or (b)(3) is required by Condition #40.

11. Compliance with all applicable requirements of 40 CFR Subparts A and JJJ, except where the permit conditions are more stringent, is required by Condition #41.

Monitoring

The EPA periodic monitoring guidance, dated September 18, 1998, requires periodic monitoring for each emission point at a source, subject to Title V of the Act that is subject to an applicable requirement.

EPA has also stated that MACT (40 CFR 63) and NSPS (40 CFR 60) standards promulgated in the 1990s by default can be considered to include monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. Thus no additional periodic monitoring discussion is included for 40 CFR 63 Subpart JJJJ (Film Line Operations)

In addition, the other main sources of applicable requirements for the facility (the 2016 new source review permit, the 1996 RACT agreement and the 1999 Consent Order) have all been created since the CAAA in the 1990s. Review of these documents revealed that, in most cases, they included monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. For example, the 2016 new source review permit included extensive material throughput limitations and associated recordkeeping provisions.

Exceptions to this were the opacity standard from the 2016 permit and certain requirements from the 1996 RACT agreement (non-contact condensers) and the 1999 consent order (223.3 tons/yr VOC limit and VOC scrubber control). Also, the existing source Rules from Chapter 40 of Virginia's regulations (Rules 4-1 and 4-24) do not contain any specific or enforceable monitoring requirements, so periodic monitoring was applied to these standards in the Title V permit.

Since there was no real monitoring provisions for the opacity requirement in the 2016 permit, an opacity observation schedule along with associated recordkeeping and reporting provisions were added. A monitoring protocol (throughputs, emission calculations and associated recordkeeping) was developed and included in the Title V permit for the Condition D.4 of the 1999 Consent Order. A monitoring protocol (annual inspections and associated recordkeeping) was developed and included in the Title V permit for the Condition E.3 of the 1996 RACT agreement and Condition D.6 of the 1999 Consent Order. Similarly, a monitoring protocol (certification of submerged fill pipe/bottom fill) was developed and included in the Title V permit for the Chapter 40 storage tank requirements (Rule 4-24). For all actual monitoring (i.e. opacity checks, monthly/annual inspections, etc.), records shall be kept to verify the occurrence and results of the monitoring. In addition, the source shall submit to the DEQ reports of any opacity observations which reveal visible emissions in excess of an applicable standard.

Compliance Assurance Monitoring (CAM) is applicable for one pollutant, particulate matter, for the Film Line Operations' baghouses (these are active control devices that are subject to emission limitations with pre-control emissions greater than 100 tons/yr of PM). Accordingly, DuPont Teijin Films submitted a CAM plan for these baghouses. In summary, DuPont Teijin Films proposes to perform monthly operational status inspections of the equipment important to the performance of the baghouses as well as daily visible emission observations during equipment operation. DEQ has reviewed, and with the issuance of the TV permit with the CAM plans included as Attachment A-1, and hereby approve the proposed CAM plans. Conditions 44-52 of the proposed TV permit reference the CAM plan attachment and also includes general CAM requirements.

1. A visual emissions observation of each emissions unit listed in Condition #31, except the primary flake bunkers #1-#21, are required once each operating month by Condition #42. Presence of any visible emissions will require a Method 9 evaluation to be performed on the emissions unit.

2. Condition #43 requires for every visible emissions observation required by Conditions #36 or 37 a measurement and recording of the differential pressure drop across the baghouse or fabric filter be made.

Note: Conditions #44 through #50 collectively establish the CAM requirements for the dust collector and filter equipment as the control device for PM emissions from the film coating lines and associated emission units.

3. Condition #44 requires the facility to conduct annual operational status inspections of all equipment important to the performance of the dust collector and filter equipment, #4271, #4406, #4411-4412, #4461, #4511-4514, #4561, #4611, #4661, #4671, #4711-#4712, #4761, #4763, #6001-6021, #6041-6045, #6066-6067 and #6070.

4. Daily visible emissions observations are required by Condition #45 when the film coating lines and associated emission units are in operation. The visible emissions observations using Method 22 like procedures as requested by the facility were found by DEQ to be adequate to ensure compliance with the monitoring requirements.

5. Condition #46 requires the facility to restore operation of any emission unit which has detectable visible emissions.

6. Condition #47 outlines some of the information which will be used to determine if acceptable procedures were used in response to an excursion or exceedance.

7. A permit modification will be required to be submitted if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data in Condition #48.

8. Condition #49 requires a Quality Implementation Plan to be submitted if the number of exceedances or excursions exceeds 5 percent duration of the operating time for the film coating lines and associated emission units.

Recordkeeping

1. Records to demonstrate compliance with Conditions # 32-35, #42-43 and #45-46 are required

to be maintained in Condition #50, in addition to the records of the VOC content of each coating formation used in the film coating operations. Records will be kept by the facility for a period of five years.

Reporting

1. Condition #51 requires the permittee to submit records of any Method 9 opacity test performed as a result of Conditions #36 or #37.

2. Semi-annual compliance reports, prepared in accordance with the requirements of 40 CFR 63.3400(c), are required to be submitted by Condition #52.

3. Condition #53 requires semi-annual CAM reports as part of the Title V semi-annual monitoring reports.

Facility Wide Conditions

Limitations

Certain requirements that are from the 2/10/2016 NSR permit and the November 30, 1999 Consent Order that apply on a plant-wide basis were included in the "Facility-Wide Requirements" section.

1. Annual VOC emissions from the entire facility are limited by Condition #54.

Monitoring

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement.

EPA has also stated that MACT (40 CFR 63) and NSPS (40 CFR 60) standards promulgated in the 1990s by default can be considered to include monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. Thus no additional periodic monitoring is discussion is included for 40 CFR 63 Subpart EEEE (Facility-Wide Requirements).

In addition, the other main sources of applicable requirements for the facility (the 2016 new source review permit, the 1996 RACT agreement and the 1999 Consent Order) have all been created since the CAAA in the 1990s. Review of these documents revealed that, in most cases, they included monitoring, recordkeeping, and reporting provisions sufficient to qualify as periodic monitoring without additional requirements. For example, the 20016 new source review permit included extensive material throughput limitations and associated recordkeeping provisions.

Exceptions to this were the opacity standard from the 2016 permit and certain requirements from the 1996 RACT agreement (non-contact condensers) and the 1999 consent order (223.3 tons/yr VOC limit and VOC scrubber control). Also, the existing source Rule from Chapter 40 of Virginia's regulations (Rules 4-1) does not contain any specific or enforceable monitoring requirements, so periodic monitoring was applied to this standard in the Title V permit.

Since there are no facility wide opacity requirements, an opacity observation schedule along with associated recordkeeping and reporting provisions has not been added to this section. A monitoring protocol (throughputs, emission calculations and associated recordkeeping) was developed and included in the Title V permit for the Condition D.4 of the 1999 Consent Order.

1. Condition #55 requires the facility to develop a maintenance schedule, operating procedures, training procedures and maintain an inventory of spare parts for air pollution control equipment in order to minimize the duration and frequency of excess emissions.

Recordkeeping

1. Records of all information that are required to demonstrate compliance with Condition #54 and all records required by Condition #55 are required to be available at the facility for 5 years by Conditions #56.

Testing

1. Condition #57 requires the facility to be constructed to allow for emissions testing at any time.

2. Condition #58 specifies the testing methods that may be used in addition to the monitoring required by the permit conditions to ensure compliance with the established limits.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia,* and the

"Department of Environmental Quality Agency Policy Statement No. 2-09".

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

INAPPLICABLE REQUIREMENTS

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A.4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720B)
0105	Polymer Plant L1 Monomer Filter Vent	5-80-720 B	VOC
0106	Polymer Plant L2 Monomer Filter Vent	5-80-720 B	VOC
0107	Polymer Plant L3 Monomer Filter Vent	5-80-720 B	VOC
0108	Polymer Plant L4 Monomer Filter Vent	5-80-720 B	VOC
0111	Polymer Plant L1 Chip Water Dryer Vent	5-80-720 B	PM/PM10
0112	Polymer Plant L2 Chip Water Dryer Vent	5-80-720 B	PM/PM10
0113	Polymer Plant L3 Chip Water Dryer Vent	5-80-720 B	PM/PM10
0114	Polymer Plant L4 Chip Water Dryer Vent	5-80-720 B	PM/PM10
0121	Wastewater Contingency Tank #3	5-80-720 B	VOC
0124	Virgin Glycol Tank A Vent	5-80-720 B	VOC
0125	Virgin Glycol Tank B Vent	5-80-720 B	VOC
0129	Recovered Glycol Tank A Vent	5-80-720 B	VOC
0130	Recovered Glycol Tank B Vent	5-80-720 B	VOC
0131	Recovered Glycol Tank C Vent	5-80-720 B	VOC
0132	Recovered Glycol Tank D Vent	5-80-720 B	VOC
0133	Recovered Glycol Tank E Vent	5-80-720 B	VOC
0134	Recovered Glycol Tank F Vent	5-80-720 B	VOC
0135	Fores Tank	5-80-720 B	VOC
0136	Blended Glycol Tank Vent	5-80-720 B	VOC
0139	Effluent Tank	5-80-720 B	VOC
0140	Polymer Plant Caustic Tank	5-80-720 B	VOC
0141	Dowtherm Tank	5-80-720 B	VOC
0153	Still #1 Seal Pot Vent	5-80-720 B	VOC
0154	Still #2 Seal Pot Vent	5-80-720 B	VOC
0162	Polymer QC Lab Hood	5-80-720 B	VOC
0163	Polymer QC Lab Hood	5-80-720 B	VOC
0164	Polymer QC Lab Hood	5-80-720 B	VOC
0165	Polymer QC Lab Hood	5-80-720 B	VOC
0166	Autoclave Agitator Motor Air Vent	5-80-720 B	VOC
0167	Autoclave Agitator Motor Air Vent	5-80-720 B	VOC
0168	Autoclave Agitator Motor Air Vent	5-80-720 B	VOC
0169	Autoclave Agitator Motor Air Vent	5-80-720 B	VOC
0170	Ball Mill/Slurry Room Exhaust	5-80-720 B	VOC

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720B)
0171	Polymer Maintenance Shop Room Vent	5-80-720 B	PM/PM10
0172	Polymer Shop Welding Hood Vent	5-80-720 B	PM/PM10
0174	Catalyst Preproom Hood	5-80-720 B	VOC
0175	Blue Dye Exhaust Hood	5-80-720 B	VOC
0176	Syloid Mix Area	5-80-720 B	PM/PM10
0178	Propane Tank	5-80-720 B	VOC
0192	TA Unloading, Storage and Feed System Polymer	5-80-720 B	PM/PM10
0193	TA Unloading, Storage and Feed System Polymer	5-80-720 B	PM/PM10
0194a	IPA Unloading and Feed System for Line 1	5-80-720 B	PM/PM10
0194b	Azelaic Acid Unloading and Feed System for Line 1	5-80-720 B	PM/PM10
0195	IPA Unloading and Feed System for Line 2	5-80-720 B	PM/PM10
0196	IPA Unloading and Feed System for Line 3	5-80-720 B	PM/PM10
0200	Inorganic Solid Additive System for Lines 2 and 3	5-80-720 B	PM/PM10
1021	Fuel Oil Tank #1	5-80-720 B	VOC
1022	Fuel Oil Tank #2	5-80-720 B	VOC
1023	Utilities Caustic Tank	5-80-720 B	VOC
1027	Wastewater Surge Tank	5-80-720 B	VOC
2042a	B83 Crystallizer Cyclone Vent	5-80-720 B	PM/PM10
2042b	B83 Crystallizer	5-80-720 B	PM/PM10
2043	Truck Loading Station Cyclone	5-80-720 B	PM/PM10/VOC
3001-3019	Reclaim Chip Bunkers #1-19	5-80-720 B	PM/PM10
3020	Chip Transfer Cyclone	5-80-720 B	PM/PM10
3021	Chip Transfer Cyclone #2	5-80-720 B	PM/PM10
3022	Reclaim Tote System	5-80-720 B	PM/PM10
4041	L40 Corona Treater	5-80-720 B	VOC
4071	L40 Extruder Area Vent	5-80-720 B	PM/PM10
4274	L42 Clip & Web Cleaner Exhaust	5-80-720 B	PM/PM10
4275	L42 Mezzanine Exhaust (relocated from L41)	5-80-720 B	PM/PM10
4276	L42 Clip Cleaner Exhaust	5-80-720 B	PM/PM10
4312	L43 Crystallizer – Steam	5-80-720 B	PM/PM10
4441	L44 Corona Treater	5-80-720 B	VOC
4472	L44 Extruder Area Vent #1	5-80-720 B	PM/PM10
4473	L44 Extruder Area Vent #2	5-80-720 B	PM/PM10

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720B)
4572	L45 Latex Prep. Room Vent	5-80-720 B	VOC
4573	L45 Latex Room Flex Exhaust Vent	5-80-720 B	VOC
4575	L45 Extruder Area Vent	5-80-720 B	PM/PM10
4613	L46 Crystallizer – Steam	5-80-720 B	PM/PM10
4641	L46 Web Slitting and Edge Trim Exhaust	5-80-720 B	PM/PM10
4672	L46 Extruder Area Vent	5-80-720 B	PM/PM10
4731	L47 Corona Treater #1	5-80-720 B	VOC
4741	L47 Corona Treater #2	5-80-720 B	VOC
4764	L47 Lab Hood Exhaust	5-80-720 B	VOC
4765	L47 QC Lab Oven Vent	5-80-720 B	VOC
4771	L47 Latex Prep Room Exhaust	5-80-720 B	VOC
4773	L47 Extruder Area Vent	5-80-720 B	PM/PM10
5001	Heat Stabilizing Oven Zone 1 Burner Vent	5-80-720 B	PM/PM10/VOC
5002	Heat Stabilizing Oven Zone 2 Burner Vent	5-80-720 B	PM/PM10/VOC
5003	Heat Stabilizing Oven Zone 3 Burner Vent	5-80-720 B	PM/PM10/VOC
5004	Heat Stabilizing Oven Zone 4 Burner Vent	5-80-720 B	PM/PM10/VOC
5005	Heat Stabilizing Oven Zone 5 Burner Vent	5-80-720 B	PM/PM10/VOC
5011	Heat Stabilizing Oven Zone 1 Exhaust	5-80-720 B	PM/PM10/VOC
5012	Heat Stabilizing Oven Zone 2 Exhaust	5-80-720 B	PM/PM10/VOC
5013	Heat Stabilizing Oven Zone 3 Exhaust	5-80-720 B	PM/PM10/VOC
5014	Heat Stabilizing Oven Zone 4 Exhaust	5-80-720 B	PM/PM10/VOC
5015	Heat Stabilizing Oven Zone 5 Exhaust	5-80-720 B	PM/PM10/VOC
6061-6065	Pelletizer Chip Water Dryers	5-80-720 B	PM/PM10
6075	Flake and Fines Box-Out	5-80-720 B	PM/PM10
6076	Railcar/Truck Chip Transfer	5-80-720 B	PM/PM10
6079	Pelletizing Area Exhaust	5-80-720 B	PM/PM10/VOC
6080	Pelletizing Area Exhaust	5-80-720 B	PM/PM10/VOC
6081	Pelletizing Automatic Die/Filter Exhaust	5-80-720 B	PM/PM10/VOC
6082	Pelletizing Automatic Die/Filter Exhaust	5-80-720 B	PM/PM10/VOC
7001	Filter Shop Sump	5-80-720 B	VOC
7002	Pack Shop Caustic Tank	5-80-720 B	VOC
7005	Die Shop Sink Feed	5-80-720 B	VOC
7006	Die Shop A/C Hood	5-80-720 B	VOC
7007	Pack Shop Pump Room , 1st Floor	5-80-720 B	VOC

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720B)
7008	Pack Shop Pump Room, 2nd Floor	5-80-720 B	VOC
7021	Ultrasonic Cleaner	5-80-720 B	PM/PM10
7022	Main Shop Welding	5-80-720 B	PM/PM10
7023	Forktruck Battery Hood (West)	5-80-720 B	VOC
7024	Forktruck Battery Hood (East)	5-80-720 B	VOC
8000	Innovation Center (I.C.) Ball Mill A	5-80-720 B	PM/PM10
8001	I.C. Ball Mill B	5-80-720 B	PM/PM10
8002	I.C. 1st Floor Fume Hoods	5-80-720 B	VOC
8003	I.C. 2nd Floor Fume Hoods	5-80-720 B	VOC
8004	I.C. Maintenance Shop	5-80-720 B	PM/PM10
8005	I.C. Ball Mill Flex Vent	5-80-720 B	VOC
8006	I.C. Eductor Hood 1" Extruder	5-80-720 B	VOC
8007	I.C. Instrument Hood	5-80-720 B	VOC
8008	I.C. Technical Dryer Vent	5-80-720 B	VOC
8010	I.C. Storage Building Flex Line	5-80-720 B	VOC
8021	Tech Service Wet Lab	5-80-720 B	VOC
8022	Tech Service High Bay	5-80-720 B	VOC
8023	Tech Service Solvent Storage Exhaust	5-80-720 B	VOC
8031	Film QC Lab	5-80-720 B	VOC
8032	Main Latex Stirrer	5-80-720 B	VOC
8033	Main Latex Tank	5-80-720 B	VOC
8034	L40/L45 Stirrer	5-80-720 B	VOC
8035	L40/L45 Flex Line	5-80-720 B	VOC
8036	L40/L45 Lab Hood	5-80-720 B	VOC
9060	P6 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9080	P8 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9090	P9 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9100	P10 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9112	P11 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9122	P12 Slitter Blade Exhaust	5-80-720 B	PM/PM10
9123	P12 Slitter Main Drive	5-80-720 B	PM/PM10
9131	P13 Slitter Blade Exhaust (cabinet)	5-80-720 B	PM/PM10
9132	P13 Slitter Corona Treater	5-80-720 B	VOC
9510	P8-10 Slitter Edge Trim Cyclone	5-80-720 B	PM/PM10
9520	Core Cutter	5-80-720 B	PM/PM10

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in Style Weekly from July 13, 2016 to August 12, 2016.