



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Kinyo Virginia Incorporated
Newport News, Virginia
Permit No. TRO-61085

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, Kinyo Virginia Incorporated has applied for a Title V Operating Permit for its Newport News, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Air Permit Writer:

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Date: **July 18, 2014**

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Date: **July 18, 2014**

Regional Director:

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I. FACILITY INFORMATION

Permittee

Kinyo Virginia, Incorporated
290 Enterprise Drive
Newport News, Virginia 23603

Facility

Kinyo Virginia, Inc.
290 Enterprise Drive
Newport News, Virginia 23603

County-Plant Identification Number: 51-700-00091

SOURCE DESCRIPTION

NAICS Code: 326299 - Rubber Offset Printing Blanket Manufacturing

Kinyo Virginia, Incorporated operates a rubber blanket manufacturing facility in Newport News, Virginia. The specialized rubber blanket products manufactured by Kinyo are used for various offset printing applications. The rubber blanket production operations begin with the preparation of raw materials for processing. The raw materials include rubber and various compounding ingredients. The raw rubber and compounding ingredients are weighed, blended, milled, and then pelletized. The pellets are next mixed with solvent to form a material known as 'rubber dough'. Following this process, the rubber dough is transferred to a carcass coater where it is coated on a cotton web substrate and then dried in a hot air chamber to produce the bottom layer of a blanket. The top (surface) layer of a blanket is produced in a similar fashion using a top coater. Next, the blanket is cured in a vulcanizer. Both the coating and drying operations take place in an area meeting the definition of a permanent total enclosure. Emissions from this enclosed area are vented to a carbon adsorption system (CAS), which serves to reduce VOC emissions and also recover solvent. After the coated web is cured and allowed to cool, the blanket's edges are trimmed to a specified width and the blanket's surface is ground. As a final step, the blanket is inspected and, for certain blanket products, an airtack machine applies a plastic film over the blanket. The blanket's dimensions are then measured and recorded prior to shipping.

Emissions of regulated pollutants from the rubber blanket manufacturing operations at the Kinyo Virginia facility include PM, VOC, and HAPs. Small quantities of PM emissions, which are controlled by baghouses, result from initial processing of raw materials and surface grinding operations. Emissions of VOCs and HAPs result primarily from the use of solvent (predominantly toluene) in the manufacturing of rubber blankets. These VOC and HAP emissions are controlled by a carbon adsorption system, which recovers solvent for reuse in the manufacturing process. Smaller quantities of VOC emissions result from the use of solvents for cleaning/inspection purposes (VM&P naphtha and isopropyl alcohol). Additionally, combustion-related air pollutant emissions occur from the operation of three natural gas-fired boilers and a

diesel emergency generator.

The facility is a Title V major source of VOC and HAP. This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility is currently permitted under two Minor NSR Permits issued on August 8, 2001 (amended on February 11, 2002) and June 1, 2005.

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.

II. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units at this facility consist of the following:

Emission Unit ID	Vent and Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Rubber Blanket Plant							
BLR-A	FBS-1	Miura Boiler, Inc. Natural Gas-Fired Low-NOx Boiler Model LX-200 SG (2008)	7.88 MMBtu/hr	-	-	-	March 3, 2008 Exemption Letter
BLR-B	FBS-2	Miura Boiler, Inc. Natural Gas-Fired Low-NOx Boiler Model LX-200 SG (2008)	7.88 MMBtu/hr	-	-	-	March 3, 2008 Exemption Letter
BLR-C	FBS-3	Miura Boiler, Inc. Natural Gas-Fired Low-NOx Boiler Model LX-200 SG (2008)	7.88 MMBtu/hr	-	-	-	March 3, 2008 Exemption Letter
GEN-1	FBS-4	Diesel-Fired Emergency Generator Cummins Onan DGDB-4487909 (2000)	100 kW	-	-	-	-
B1	BV1, S1	Weighing of Raw Materials	528,000 square meters of blanket production per year	Wheelabrator Canada, Inc. – 44WCC mod 36 D/C fabric filter, 99.5% control efficiency	BH1	PM	August 8, 2001, amended February 11, 2002

Emission Unit ID	Vent and Stack ID	Emission Unit Description	Size/Rated Capacity *	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
B2	BV2, S2	Kneader-blender	528,000 square meters of blanket production per year	Wheelabrator Canada, Inc. – 33WCC mod 36 D/C fabric filter, 99.5% control efficiency	BH2	PM	August 8, 2001, amended February 11, 2002
B3	BV3, S3	Open-mill	528,000 square meters of blanket production per year	Wheelabrator Canada, Inc. – 44WCC mod 36 D/C fabric filter, 99.5% control efficiency	BH3	PM	August 8, 2001, amended February 11, 2002
B4a, B4b, B4c	BV4, S4; BV2, S2	Rubber pelletizers	528,000 square meters of blanket production per year	Wheelabrator Canada, Inc. – 43WCC mod 36 D/C fabric filter, 99.5% control efficiency	BH4	PM	August 8, 2001, amended February 11, 2002
B5-B15	BV5-BV15; S5	Mixers - rubber churning	528,000 square meters of blanket production per year	Total enclosure/ Solvent Recovery System (SRS), 95% control efficiency	CAS1	VOC, HAP	August 8, 2001, amended February 11, 2002
B16-B19	BV16-BV19; S5	Coating & drying Chambers	528,000 square meters of blanket production per year	Total enclosure/ Solvent Recovery System (SRS), 95% control efficiency	CAS1	VOC, HAP	August 8, 2001, amended February 11, 2002

Emission Unit ID	Vent and Stack ID	Emission Unit Description	Size/Rated Capacity *	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
B21a	BV21; S7a	Stretching/Drying Machine (for curing)	528,000 square meters of blanket production per year	-	-	-	Part of the curing (vulcanizing) process; not in permit
B21-B23	BV21-BV23; S7 (hoods collect emissions and vent to outside when doors are opened at end of cycle)	Vulcanizers (curing)	528,000 square meters of blanket production per year	-	-	-	August 8, 2001, amended February 11, 2002
B24	BV24; S8, S9	Surface grinder #1	528,000 square meters of blanket production per year	Amano Atomic BP-49NK and Amano Atomic BP-36NK fabric filter, 99.5% control efficiency	BH6, BH7	PM	August 8, 2001, amended February 11, 2002
B25	BV25; S10, S11	Surface grinder #2	528,000 square meters of blanket production per year	Amano Atomic BP-49NK and Amano Atomic BP-36NK fabric filter, 99.5% control efficiency	BH8, BH9	PM	August 8, 2001, amended February 11, 2002
B26	BV26; S12	Surface grinder #3	528,000 square meters of blanket production per year	Amano Atomic WRT-4064 fabric filter, 99.5% control efficiency	BH10	PM	August 8, 2001, amended February 11, 2002

Emission Unit ID	Vent and Stack ID	Emission Unit Description	Size/Rated Capacity *	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
B27	BV27; S5	Inspection & general cleaning	528,000 square meters of blanket production per year	-	-	-	August 8, 2001, amended February 11, 2002
B28	BV28; S13	Rubber blanket surface grinder	528,000 square meters of blanket production per year	Wheelabrator Modular Jet 3 Model 132 Series 6P fabric filter, 99.5% control efficiency	BH11	PM	June 1, 2005
TANK-1	-	Toluene storage tank	6,000 gallons	-	-	-	-
LR-1	-	Toluene transfer operation - unloads from transport vehicle to toluene storage tank only	< 800,000 gallons per year	-	-	-	-

Changes to the equipment list:

The emission unit and pollution control equipment tables have been merged into one table for clarity. This is consistent with the formatting in the current Title V boilerplate.

BLR-A, BLR-B, and BLR-C are now subject to the requirements of 40 CFR 63, Subpart DDDDD; therefore, they are no longer considered insignificant emission units. They have been moved to the list of significant emission units.

Emergency generator GEN-1 has been included in the list of significant emission units. This unit was included in the Title V renewal application dated October 31, 2013.

Unit B-20 (Gyro Sifter) is no longer in operation. This change was included in the Title V renewal application dated October 31, 2013. The unit has been removed from the list of significant emission units.

The Stack ID Numbers for units B5-B15, B16-B19, B21a, B21-B23, B24, B25, and B27 have been corrected, based on the information provided in the Title V renewal application dated October 31, 2013 and additional information received on May 9, 2014.

The control device manufacturer for BH6-BH9 has been changed from NEC Automation, Inc. BP-36-N to Amano Atomic BP-49NK and Amano Atomic BP-36NK. This change was included in the Title V renewal application dated October 31, 2013.

TANK-1 and LR-1 have been included as significant emission units. These operations are subject to the notification, reporting, and recordkeeping requirements under 40 CFR 63, Subpart EEEE. Previous permits mistakenly included TANK-1 as an insignificant emission unit and made no mention of LR-1.

EMISSIONS INVENTORY

A copy of the 2012 annual emission update is attached. Emissions are summarized in the following tables.

2012 Actual Emissions

Emission Unit	2012 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
B27	4.7				
B5-B19, B21-B23, Fugitive Losses	50.5				
BLR-A, BLR-B, BLR-C	0.19	2.7	0.02	0.25	3.2
Total	55.4	2.7	0.02	0.25	3.2

2012 Facility Hazardous Air Pollutant Emissions

Pollutant	2012 Hazardous Air Pollutant Emission in Tons/Yr
Toluene	50.5

III. EMISSION UNIT APPLICABLE REQUIREMENTS - Fuel Burning Equipment Requirements - (BLR-A, BLR-B, and BLR-C)

Limitations

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The applicable limitations from MACT DDDDD are included in Condition 1.

Monitoring

The applicable monitoring requirements from MACT DDDDD are included in Condition 2.

Notifications, Recordkeeping, and Reporting

The applicable notification, recordkeeping, and reporting requirements from MACT DDDDD are included in Condition 3.

IV. EMISSION UNIT APPLICABLE REQUIREMENTS – Emergency Generator Requirements - (GEN-1)

Limitations, Monitoring, Recordkeeping, and Reporting

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

All applicable requirements from MACT ZZZZ are included in Condition 4.

V. EMISSION UNIT APPLICABLE REQUIREMENTS - Process Equipment Requirements - (B1-B28)

Limitations

The following limitations are derived from the New Source Review permit issued August 8, 2001 (amended February 11, 2002):

Condition 5 (NSR Condition 3): Emission Controls
Condition 7 (NSR Condition 5): Emission Controls
Condition 8 (NSR Condition 6): Emission Controls
Condition 10 (NSR Condition 10): Throughput
Condition 11 (NSR Condition 11): Throughput
Condition 12 (NSR Condition 12): Throughput
Condition 13 (NSR Condition 13): Throughput
Condition 14 (NSR Condition 14): Control Efficiency
Condition 15 (NSR Condition 22): Requirements by Reference
Condition 16 (NSR Condition 16): Emission Limits
Condition 17 (NSR Condition 17): Emission Limits
Condition 18 (NSR Condition 18): Emission Limits
Condition 19 (NSR Condition 19): Toxics, Hazardous Air Pollutants
Condition 20 (NSR Condition 20): Toxic Emission Limits

Note: Condition 8 has been revised to clarify the specific compliance requirements from NSPS VVV.

The following limitations are derived from the New Source Review permit issued June 1, 2005:

Condition 21 (NSR Condition 6): Emission Limits

The following limitations are derived from the New Source Review permits issued August 8, 2001 (amended February 11, 2002) and June 1, 2005:

Condition 6 (8/8/01 NSR Condition 4; 6/1/05 NSR Condition 3): Emission Controls
Condition 9 (8/8/01 NSR Condition 9; 6/1/05 NSR Condition 5): Production
Condition 22 (8/8/01 NSR Condition 21; 6/1/05 NSR Condition 7): Visible Emission Limit

Note: Condition 22 has been revised to include the Stack ID numbers, in addition to the PCD ID numbers, to better clarify the number of exhaust points.

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 60, Subpart VVV Standards of Performance for Polymeric Coating of Supporting Substrates Facilities

Monitoring

Emission Units B5-B19 and B27 (Conditions 23 and 25) - The source is required to install a monitoring system meeting the design specifications of 40 CFR 60, Appendix B, to measure and record the concentrations of VOC's (as total hydrocarbons measured as propane) from the carbon adsorber stack. The source is required to monitor the device daily, continuously record the monitoring data, and install a high organic concentration level alarm. The previous permit included an additional requirement for the source to have in place a monitor quality control program, which meets the requirements of 40 CFR 60.13, and Appendix B, for all continuous monitoring systems; however, neither 40 CFR 60.13 nor Appendix B include quality control requirements, so this Condition was deemed unnecessary. Condition 23 adequately covers the requirements of 60.13 and Appendix B.

Emission Units B5-B19 and B27 (Condition 24) - In addition, the source is required to install a monitoring device that continuously measures and records the exhaust duct flow rate as an indicator of the performance of the total enclosures, as required under 40 CFR 60.744(g) and (h).

Emission Units BH1-B10, B11, and B21-B23 (Condition 26) - The source is required to perform a weekly visual emissions observation for each emission unit with an opacity limit. If any visible emissions are observed, the source is required to perform corrective action. If such corrective action fails to eliminate the visible emissions, the source is required to perform a Method 9 Visible Emissions Evaluation (VEE). This condition has been revised from the condition found in the previous permit to include more specific recordkeeping requirements.

Emission Unit B28 - Compliance Assurance Monitoring (Conditions 27 and 28) - The rubber blanket surface grinder is subject to Compliance Assurance Monitoring (CAM). The source submitted a CAM plan as part of the May 8, 2006 Title V modification. The CAM plan is included in the permit as Attachment A and outlines the requirements for daily visible emissions observations. The source is also required to develop and maintain a Quality Improvement Plan (QIP), in accordance with 40 CFR 64.8, if more than five excursions from the indicator range specified in the Compliance Assurance Monitoring Plan occur within any consecutive six-month period.

Recordkeeping and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. The annual production of rubber blankets, calculated monthly as the sum of each consecutive 12-month's production.
- b. The throughput of all Toluene, calculated daily and monthly and calculated annually as the sum of each consecutive 12-month's production.

- c. The annual throughput of Methyl Ethyl Ketone, calculated monthly and as the sum of each consecutive 12-month period.
- d. The annual throughput of VM&P Naphtha, calculated monthly and as the sum of the previous consecutive 12-month period.
- e. The annual throughput of Isopropyl Alcohol, calculated monthly and as the sum of the previous consecutive 12-month period.
- f. Operation and control device monitoring records for the carbon adsorber recovery system, including strip recorder data.
- g. Records of visual emissions observations, visible emissions evaluations, and any corrective action taken, as required by Condition 26.

Condition 30 outlines the requirements for submitting excess emissions reports for all units equipped with a continuous monitoring system (Units B5-B19 and B27).

The applicable recordkeeping and reporting requirements for NSPS VVV are included in Condition 31.

Condition 32 outlines the recordkeeping and reporting requirements required under CAM (Unit B28).

Notifications

Conditions 33 and 34 outline the requirements for excess emissions notifications.

Testing

The testing requirements from the 8/8/01 NSR permit (NSR Condition 8) are included in Condition 35.

If testing is conducted in addition to the monitoring specified in the permit, the permittee shall use the appropriate methods in accordance with procedures approved by the DEQ.

VI. EMISSION UNIT APPLICABLE REQUIREMENTS - National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart OOOO

Limitations

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart OOOO National Emission Standards for Hazardous Air Pollutants:
Printing, Coating, and Dyeing of Fabrics and Other Textiles

The applicable limitations from MACT OOOO are included in Conditions 37-40.

Notifications, Reporting, and Recordkeeping

The applicable notifications, reporting, and recordkeeping requirements from MACT OOOO are included in Conditions 41-43.

Minor revisions have been made to the notification and reporting requirements in Condition 41. Specific references to the MACT requirements have been included for clarity. The submittal dates for the Initial Notification and Notification of Compliance Status have also been included to show that the source has demonstrated compliance with these requirements.

VII. EMISSION UNIT APPLICABLE REQUIREMENTS - National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart EEEE

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart EEEE National Emission Standards for Hazardous Air Pollutants:
Organic Liquids Distribution (Non-Gasoline)

Notifications and Reporting

The source operates a toluene transfer operation and a toluene storage tank, which are subject to 40 CFR 63, Subpart EEEE. Table 2 to MACT EEEE includes emission limitations for each transfer operation at an existing source with a total facility-wide organic liquid loading volume of 800,000 gallons or more, where the organic liquid is being loaded into a transport vehicle. Because the Kinyo facility loads less than 800,000 gallons of toluene per year and the toluene is only unloaded into a storage tank *from* a transport vehicle, not loaded *into* a transport vehicle, the MACT emission control requirements do not apply to the transfer operation.

The MACT also includes emission limitations for each organic liquid storage tank at an existing source with a capacity greater than or equal to 5,000 gallons, where the organic liquid is not crude oil and has an average true vapor pressure greater than or equal to 4.0 psia. The toluene storage tank at the Kinyo facility has a capacity of 6,000 gallons; however, the average annual vapor pressure of the toluene is 0.32 psia, which is well below the applicability threshold. Therefore, the MACT emission control requirements do not apply to the toluene storage tank.

Because Kinyo's organic liquid transfer and storage operations are not subject to the control requirements in MACT EEEE, the source is only subject to the notification, reporting, and recordkeeping requirements of the MACT. Under the MACT, the source is required to submit a Notice of Compliance Status (NOCS) and first compliance report. The NOCS and first compliance report were due on October 1, 2007. These documents were deemed complete when received by DEQ in September 2007 (postmarked September 27, 2007), thus the source has completed its notification and reporting obligations under the MACT. No other compliance reports are required unless the exemption status of the source changes.

The applicable notification and reporting requirements from the MACT were previously included in the Title V permit, but have been revised for clarity. Specific language from the MACT has been included.

The applicable MACT EEEE recordkeeping requirements for the toluene transfer operation (LR-1) and the toluene storage tank (TANK-1) have been included in the Title V permit. The source is required to maintain records demonstrating that the transfer rack and storage tank are not subject to the control requirements of the MACT. For the storage tank, this includes documentation of the annual average true vapor pressure of the toluene stored in TANK-1. These recordkeeping requirements were left out of previous Title V permits.

Even though no control requirements apply, the toluene storage tank is subject to notification, reporting, and recordkeeping requirements of the MACT; therefore, this unit cannot be considered insignificant under Title V, regardless of its potential to emit. TANK-1 has been moved from the list of insignificant emission units to the list of significant emission units in Section II. The toluene transfer operation (LR-1) was not included in previous Title V permits. It has also been added to the list of significant emission units in Section II.

VIII. EMISSION UNIT APPLICABLE REQUIREMENTS - Facility Wide

Limitations

The following limitations are derived from the New Source Review permit issued October 17, 2013:

Condition 48 (8/8/01 NSR Condition 31): Facility or Control Equipment Malfunction - Hazardous Air Pollutant Processes

Condition 49 (8/8/01 NSR Condition 32; 6/1/05 NSR Condition 11): Violation of Ambient Air Quality Standard

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-50-80 Standard for Visible Emissions for New and Modified Stationary Sources

9 VAC 5-20-180 Facility and Control Equipment Maintenance or Malfunction.

Note: Units BLR-A, BLR-B, BLR-C, and GEN-1 have been included in the opacity limit condition (Condition 47). The reference numbers cited in this condition have been revised to include only those equipment units without BACT opacity limits (see Condition 22 for BACT opacity limits for units BH1-B10, B11, and B21-B23).

Monitoring

No periodic monitoring requirements for opacity have been included for units BLR-A, BLR-B, BLR-C, and GEN-1. The boilers are small natural gas-fired units and the generator is a small diesel-fired unit used only for emergency purposes. These units would be insignificant if not for their applicability to MACT DDDDD and MACT ZZZZ and are not expected to exceed the 20/30% new source opacity standard.

Recordkeeping

No facility-wide recordkeeping requirements are included. Recordkeeping requirements for individual equipment units are included in Sections III through VII.

Testing

No facility-wide testing requirements are included. Testing requirements for individual equipment units are included in Sections III through VII. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

The facility-wide Maintenance/Operating Procedures condition (Condition VI.4 of the 5/15/09 Title V permit) has not been included in this renewal permit. These requirements are optional in the current minor NSR boilerplate and are no longer necessary for this source. The NSR condition (General Condition 33 of the NSR permit issued 8/8/01, amended 2/11/02) will be updated the next time the permit is open.

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

96-101. 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".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

107. 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.

This general condition cites the sections that follow:

9 VAC 5-40-41 Emissions Monitoring Procedures for Existing Sources

9 VAC 5-40-50 Notification, Records and Reporting

9 VAC 5-50-50 Notification, Records and Reporting

111. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50 Applicability, Federal Operating Permits For Stationary Sources

9 VAC 5-80-190 Changes to Permits

9 VAC 5-80-260	Enforcement
9 VAC 5-80-1100	Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605	Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000	Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

125-128. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in Sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Conditions 125-128 and General Condition 107. For further explanation see the comments on general condition 107.

These general conditions cite the sections that follow:

9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110	Permit Content

132. 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.

This general condition contains the citations from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to demolition and renovation
40 CFR 61.148, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to insulating materials
40 CFR 61.150, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to waste disposal

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70	Designated Emissions Standards
9 VAC 5-80-110	Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State:

9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions

9 VAC 5 Chapter 60, Part II, Article 5: Emission Standards for Toxic Pollutants from New and Modified Sources

Streamlined Requirements

The State-Only Enforceable Toxic Air Pollutants condition (Condition X.A.1 of the 5/15/09 Title V permit) has not been included in this renewal permit. Methyl Ethyl Ketone was de-listed from EPA’s Hazardous Air Pollutants list on December 19, 2005. This pollutant was removed from the VA DEQ State Toxics list on June 1, 2007 (legislative change adopted March 26, 2007). The NSR condition (Condition 19 of the NSR permit issued 8/8/01, amended 2/11/02) will be updated the next time the permit is open. Isopropyl alcohol will also be removed from this condition at that time. This solvent is not included on EPA’s Hazardous Air Pollutant list or the VA DEQ State Toxics list. Isopropyl alcohol was removed from the list of approved HAPs in the Title V permit during the 5/15/09 Title V renewal.

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Subpart Kb was amended on October 15, 2003 to exempt those storage vessels previously subject to recordkeeping requirements only.

After July 1, 2011, sources that emit or have the potential to emit 100,000 tpy CO₂e and 100 tpy of greenhouse gases on a mass basis are required to have a Title V permit even if they are not Title V major for any criteria pollutant or HAP. Additionally, any source that increases their CO₂e emissions more than 75,000 tpy as a result of a modification is required to address their CO₂e emissions as part of the Title V permit.

Kinyo Virginia is not currently subject to GHG regulations. There are no applicable GHG permitting requirements for this source.

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 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
SES-1	Solvent Evaporation System	9 VAC 5-80-720 B.2	VOC	
PLC-1	Pilot Laboratory Coating Machine	9 VAC 5-80-720 B.2	VOC	

¹The 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 placed on public notice in the Daily Press newspaper from **Monday, June 2, 2014** to **Wednesday, July 2, 2014**.