

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

IAC Strasburg, LLC
Strasburg, Virginia
Permit No. VRO80964

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, IAC Strasburg, LLC has applied for a renewal of a Title V Operating Permit for its plastic automotive interior trim component manufacturing facility in Strasburg, Virginia. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: Debbie D. Medlin Date: 11/07/13

Debbie D. Medlin

Air Permit Manager: Janardan R. Pandey Date: 11/07/13

Janardan R Pandey, P.E.

FACILITY INFORMATION

Permittee

IAC Strasburg, LLC
806 East Queen Street
Strasburg, Virginia 22657

Facility

IAC Strasburg, LLC
806 East Queen Street
Strasburg, Virginia 22657

County-Plant ID No: 51-171-0058

SOURCE DESCRIPTION

NAICS Code 326199 – All Other Plastics Product Manufacturing (formerly SIC 3089 – Plastics Products, Not Elsewhere Classified) and NAICS Code 32615 – Urethane and Other Foam Product (except Polystyrene) Manufacturing (formerly SIC 3086 – Plastics Foam Products)

IAC Strasburg, LLC (formerly Lear Operations Corporation) is involved in the manufacturing of plastic automotive interior trim components. Manufacturing processes include: painting, injection molding, foam production, adhesive application, and rotocast machines.

Although no longer a major source of HAPs, IAC will remain a Title V source due to “Once In, Always In” EPA guidance as a result of previous MACT applicability for 40 CFR Part 63 Subpart III (Flexible Polyurethane Foam Production NESHAP). This source is located in an attainment area for all pollutants, and is currently a PSD synthetic minor source. The facility was previously permitted under a minor New Source Review (NSR) permit dated November 15, 2010 as amended October 7, 2011 (hereafter referenced as NSR permit dated 10/07/11). IAC submitted Title V renewal applications and supporting documentation dated March 7, 2013.

COMPLIANCE STATUS

The facility is inspected every other year. IAC Strasburg, LLC was last inspected during a full compliance evaluation on May 22, 2012, and is now operating in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Table I. Significant Emission Units

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Surface Coating Operations							
PL1-PAINT 1B	1	One Spray Booth equipped with HVLP gun and an electric drying oven	5 gal/hr	Dry Filter	PL1-DF1	PM, PM-10	2/7/08
				HVLP guns, Electric Drying Oven	PL1-HVLP1, PL1-1B-OV	VOC	
PL2-PAINT-R/T-020	2-1A, 2-1B	One Binks Paint Booth equipped with three (3) HVLP guns and a natural gas drying oven	5 gal/hr	Dry Filter	PL2-DF1	PM, PM-10	2/7/08
				HVLP guns, Natural Gas Drying Oven	PL2-HVLP1, PL2-PAINT-OV	VOC	
PL2-GB1-Line1	2-15, 2-13	One Glue/Paint application Line which includes one spray booth equipped with HVLP guns, dry filters and a natural gas curing oven [part of GMX130 manufacturing process]	5 gal/hr	Dry Filter	PL2-GL1-DF1	PM, PM-10	2/7/08
				HVLP guns, Natural Gas Curing Oven	PL2-HVLP2, PL2-GB1-OV	VOC	
Miscellaneous							
RC1, RC2	-	Rotocasts 1 and 2 each equipped with two ovens (PL2-OV1 and 2, PL2-OV3 and 4) and cooling chambers	-	-	-	-	-
PL3-MR-IF	-	Impact Foam line Mold Release	-	-	-	-	-
CC1	-	Plant 1 Mold Shop Parts Washer	-	-	-	-	-
MOLD-CLN	-	Mold Cleaning – aerosol cans used at injection press in Plant 1 Mold Shop	-	-	-	-	-
Paint-CLN	-	Paint Gun Cleaner	-	-	-	-	-

EMISSIONS INVENTORY

A copy of the 2012 CEDS consolidated plant emissions report is attached as Attachment A. Emissions are summarized in the following tables.

Table II. 2012 Actual Criteria Pollutant Emissions

	Criteria Pollutant Emissions (tons/yr)				
	VOC	CO	SO ₂	PM-10	NO _x
Surface Coating Operations	3.20	-	-	0.15	-
Injection Molding - Resin	8.22	-	-	-	-
Rotocasts	3.65	-	-	-	-
Miscellaneous	3.44	-	-	-	-
Total	18.51	0.00	0.00	0.15	0.00

Table III. 2012 Actual Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emissions (tons/yr)*
Cumene (CAS # 98-82-8)	0.0105
Ethyl Benzene (CAS # 100-41-4)	0.000126
Glycol Ethers	0.69
HDI (CAS # 822-06-0)	0.0000758
Methanol (CAS # 67-56-1)	0.00185
Methyl Isobutyl Ketone (CAS # 108-10-1)	-
Naphthalene (CAS # 91-20-3)	-
Toluene (CAS # 108-88-3)	-
Triethylamine (CAS # 121-44-8)	0.081
Vinyl Acetate (CAS # 108-05-4)	0.00016
Xylene (CAS # 1330-20-7)	0.00001
Total	0.729

*Note: Emission rates for HAPs are included in the emission rate of the criteria pollutants (as seen in Table II).

EMISSION UNIT APPLICABLE REQUIREMENTS
Surface Coating Operations Requirements

Limitations

PL1-PAINT 1B [spray booth], PL2-PAINT-R/T-020 [spray booth], and PL2-GB1-Line1 [glue/
paint application line]

The following limitations are state requirements from the NSR permit dated 10/07/11. Please note that the condition numbers are from the 10/07/11 permit; a copy of the permit is enclosed as Attachment B.

Conditions 2 and 3: Requires dry filters with a control efficiency of 97.4 percent for all three spray booths.

Conditions 4 and 5: Requires high volume low pressure (HVLP) spray guns or equivalent control for all three spray booths.

Condition 6: Limits the monthly average glue VOC content in the PL2-GB1-Line1 to 0.4 pounds per gallon of coating as applied.

Condition 7: Limits the monthly average paint VOC content in the PL2-GB1-Line1 to 3.0 pounds per gallon of coating as applied.

Condition 8: Requires that VOC work practice standards are followed to minimize VOC emissions.

Condition 12: Limits throughput of coatings to the PL2-GB1-Line 1 spray booth to 4.3 tons VOC per year.

Condition 13: Limits throughput of coatings to the PL1-PAINT 1B spray booth to 2.7 tons VOC per year.

Condition 14: Limits throughput of coatings to the PL2-PAINT-R/T-020 spray booth to 5.2 tons VOC per year.

Condition 15: Limits PM, PM-10 and VOC emissions from the PL1-PAINT 1B spray booth.

Condition 16: Limits PM, PM-10 and VOC emissions from the PL2-PAINT-R/T-020 spray booth.

Condition 17: Limits PM, PM-10 and VOC emissions from the PL2-GB1-Line1 spray booth.

Condition 18: Limits visible emissions from the spray booths (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1) and curing oven exhausts (PL1-1B-OV, PL2-

PAINT-OV, and PL2-GB1-OV) to 5% opacity.

Condition 22: Requires a maintenance schedule, inventory of spare parts, written operating procedures, and that all operators of air pollution control equipment be properly trained.

Monitoring

PL1-PAINT 1B [spray booth], PL2-PAINT-R/T-020 [spray booth], and PL2-GB1-Line1 [glue/paint application line]

IAC does not meet the criteria for 40 CFR Part 64 Compliance Assurance Monitoring (CAM) applicability (40 CFR §64.2(a)(3)) because the pre-control potential to emit (PTE) for particulates for all coating operations are under the Title V major threshold of 100 tons per year. The pre-control PTE for particulates from all three spray booths is approximately 68.2 tons per year. None of the particulate emissions are HAPs. No other pollutant is controlled by an add-on control device. Although IAC is not subject to CAM, all of the coating booths are subject to the periodic monitoring requirements in 40 CFR Part 70 (Title V).

The monitoring section incorporates the requirement from Conditions 8 and 9 of the NSR permit dated 10/07/11 which requires a monitoring device to continuously measure the differential pressure drop through the PL2-GB1-Line1 spray booth filters.

IAC will be required to perform daily inspections of the spray booth filter(s) each day the paint spray booth(s) is in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the spray booth(s). If the filter(s) are not functioning properly, visible emissions will be present.

IAC is required to maintain a Material Safety Data Sheet (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing VOC content for each coating used in the spray booths. These MSDS will be utilized in calculating VOC emissions as detailed below.

IAC will demonstrate compliance with the VOC emission limits using the VOC content in the MSDS, CPDS, or other vendor information as approved by DEQ in mass balance calculations. The VOC content has been certified by the vendor, thereby providing reasonable assurance that the VOC emission limits are not violated.

IAC will determine compliance with the VOC emission limits for the coating spray booths using the following formula:

- To determine annual emissions of VOC from coating, adhesive, reducer, and cleaning solution usage:

$$E = \sum_{i=1}^n C_i G_i$$

..... Equation 1

Where:

- E = VOC emission rate of the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1] (lb/time period)
- C_i = VOC content of each material [including coatings, adhesives, reducers, and cleaning solutions] (i) applied in the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1] during the time period (lb/gal)
- G_i = Number of gallons of each material [including coatings, adhesives, reducers, and cleaning solutions] (i) applied in the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12-month period.

IAC will determine compliance with the particulate emission limits for coating spray booths using the following formulas:

- To calculate particulate emissions on an hourly, monthly or annual basis:

$$E = \left(\sum_{i=1}^n P_i G_i D_i \right) \left(\frac{100 - T}{100} \right) \left(\frac{100 - CE}{100} \right)$$

..... Equation 2

Where:

- E = particulate emission rate for the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1] (lb/time period)
- P_i = solids content of each coating (i) applied in the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1] during the time period (lb solids/lb paint)
- G_i = number of gallons of each coating (i) applied in the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1] during the time period (gal)
- D_i = density of each coating (i) applied in the glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1] during the time period (lb/gal)
- T = transfer efficiency of each glue/paint coating line [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1] (%)
 = 50 [unless records demonstrate a higher value is appropriate]
- CE = control efficiency of the filter on each of the glue/paint coating lines [PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line 1](%)
 = 85 [unless records demonstrate a higher value is appropriate]

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

IAC will determine compliance with the VOC content limit for glue application using the following formulas:

➤ To determine average VOC content:

$$AC = \frac{\sum_{i=1}^n C_i G_i}{\sum_{i=1}^n G_i} \dots\dots\dots \text{Equation 3}$$

Where:

AC = average VOC content of glue/adhesive coatings applied in the glue/paint coating line [PL2-GB1-Line 1] (lb/gal)

C_i = VOC content of each coating (i) applied in the glue/paint coating line [PL2-GB1-Line 1] during each month (lb/gal)

G_i = number of gallons of each coating (i) applied in the glue/paint coating line [PL2-GB1-Line 1] during each month (gal)

Average VOC content shall be calculated once each calendar month.

The daily inspections, monitoring, and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the glue/paint spray booths.

Recordkeeping

The recordkeeping section incorporates requirements from Condition 19 of the NSR permit dated 10/07/11. The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: inspection records as required by Condition III.B.2; monthly records of the amount (in gallons) of each coating, adhesive, and reducer issued from storage; monthly and annual coating, adhesive, and reducer throughputs (in gallons) to the spray booths (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1); monthly and annual coating, adhesive, and reducer VOC throughputs (in tons) to the spray booths (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1); total hours that each spray booth (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1) operates; monthly and annual VOC emissions and hourly, monthly and annual particulate emissions from the spray booths (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1); material safety data sheets (MSDS), certified product data sheets (CPDS), or other vendor information as approved by DEQ showing coating name, VOC content, water content, and solids content for each coating, adhesive, and cleaning solution used in the spray booths (PL1-PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1); results of all stack tests and visible emission evaluations; maintenance and training records as required by Condition 18; and records of manufacturer’s specifications for the dry filters used in the

glue/paint application spray booth (PL2-GB1-Line1) to demonstrate compliance with the 97.4% control efficiency requirement.

Testing

Condition 11 of NSR permit dated 10/07/11 requires that test ports be provided in appropriate locations when requested. This condition has been incorporated into the Title V permit.

The permit does not require source tests. A condition is included in the permit that requires appropriate test methods approved by DEQ if testing is performed. 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

PL1-PAINT 1B [spray booth], PL2-PAINT-R/T-020 [spray booth], and PL2-GB1-Line1 [glue/paint application line]

The spray booths (PL1-0PAINT 1B, PL2-PAINT-R/T-020, and PL2-GB1-Line1) and the curing oven exhausts (PL1-1B-OV, PL2-PAINT-OV, and PL2-GB1-OV) were constructed after 1972 and are subject to 9 VAC 5-50-80, Standard for Visible Emissions. The standard limits visible emissions from the units to less than 20% except during one six-minute period in any one hour in which visible emissions shall not exceed 30%. The NSR permit dated 10/07/11 limits visible emissions from each of these units not to exceed 5% at any time. Compliance with the opacity limit from the minor NSR permit will ensure compliance with 9 VAC 5-50-80. In the Title V permit, 9 VAC 5-50-80 has been streamlined and the operating permit simply contains the opacity limitation from the minor NSR permit.

Facility Wide Conditions – Hazardous Air Pollutants

Limitations

During the previous renewal of the Title V permit, IAC requested emission limits for hazardous air pollutants (HAPs) to allow them to become a synthetic minor source of HAPs. The same HAP emission limits are also included in the proposed Title V operating permit (9.80 tons per year of any individual HAP or 24.50 tons per year of any combination of HAPs) to ensure IAC's PTE remains below major source levels for HAPs. Therefore, IAC will continue to avoid applicability of Maximum Achievable Control Technology (MACT) standards with compliance dates after January 8, 2009.

Monitoring and Recordkeeping

IAC will be required to maintain records of emission data and operating parameters to demonstrate compliance with the synthetic minor HAP limits in Condition 21. These records will include monthly and annual throughputs of each HAP-containing material used, along with monthly and annual individual and total HAP emissions from the facility.

Reporting

The permit requires semiannual reports. The reports are to contain:

- Monthly and annual 12-month rolling throughputs of HAPs (in tons) from the existing facility.
- Monthly and annual 12-month rolling emissions of HAPs (in tons) from the existing facility.

Hazardous Air Pollutants Conditions

The Flexible Polyurethane Foam Production MACT (40 CFR 63 Subpart III) and the Surface Coating of Plastic Parts and Products MACT (40 CFR 63 Subpart PPPP) were promulgated October 7, 1998 and April 19, 2004, respectively. These two MACTs were identified as applicable requirements in IAC's Title V application. Placeholder language was added in Section V for Limitations and Recordkeeping for the Flexible Polyurethane Foam Production MACT (40 CFR 63 Subpart III). The permit language incorporates all control, operational, work practice, monitoring, recordkeeping, reporting, and testing requirements, as applicable. Coating throughput limits established in IAC's minor NSR permit limited the potential-to-emit of the surface coating operations to below major source levels before the Surface Coating of Plastic Parts and Products MACT (40 CFR 63 Subpart PPPP) compliance date of April 19, 2007. Therefore, Subpart PPPP is not applicable to IAC.

The Flexible Polyurethane Foam Production MACT is applicable to any flexible polyurethane foam or rebond foam process that produces flexible polyurethane or rebond foam, emits a HAP, and is located at a plant site that is a major source of HAPs. The only standards from Subpart III that apply to molded flexible polyurethane foam production are: a) a HAP or HAP-based material shall not be used as an equipment cleaner and b) a HAP-based mold release agent shall not be used in a molded flexible polyurethane foam source process. IAC utilized methylene chloride, a HAP, to clean the molds of the molded flexible polyurethane foam operations after the compliance date of Subpart III which is October 8, 2001. IAC stopped using the methylene chloride for cleaning when they switched to high pressure heads. The molded foam operations are now flushed with water instead of using a HAP. Due to the "once in always in" policy per the EPA guidance memo (May 16, 1995), Subpart III remains applicable to IAC's molded polyurethane foam process even though the synthetic minor HAP limits will now be in place.

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 permit 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, including those caused by upsets, within four daytime business hours.

STATE ONLY APPLICABLE REQUIREMENTS

The state toxic compound limits from the minor NSR permit may be designated as state-only requirements. Therefore, state-only applicable requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

IAC did not identify any future applicable requirements in their application.

INAPPLICABLE REQUIREMENTS

IAC did identify the Flexible Polyurethane Foam Fabrication Operations MACT (40 CFR 63 Subpart M) and the Halogenated Solvent MACT (40 CFR 63 Subpart T) as inapplicable requirements in their application. Therefore, these inapplicable requirements have been included in the permit in the section labeled Permit Shield and Inapplicable Requirements.

There are no applicable Greenhouse Gases permitting requirements.

COMPLIANCE PLAN

IAC is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

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:

Table IV. Insignificant Emission Units

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL1-1B-OV	Drying oven for front paint line in Plant 1	9 VAC 5-80-720 C	-	0.16 MMBTU/hr
PL2-PAINT-OV	Natural gas-fired infrared oven in Plant 2	9 VAC 5-80-720 C	-	0.5 MMBTU/hr
PL2-OV3-4	Four curing ovens for rotocast operations	9 VAC 5-80-720 C	-	1.5 MMBTU/hr (each)
SH1-40	Forty space heaters in Plant 1	9 VAC 5-80-720 C	-	0.26 MMBTU/hr (each)
SH41-57	Seventeen space heaters in Plant 2	9 VAC 5-80-720 C	-	0.26 MMBTU/hr (each)
SH58-73	Sixteen space heaters in Plant 3	9 VAC 5-80-720 C	-	0.26 MMBTU/hr (each)

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
SH74-76	Three space heaters in Plant 4	9 VAC 5-80-720 C	-	2.817 MMBTU/hr (each)
SH77-78	Two space heaters in Plant 4	9 VAC 5-80-720 C	-	1.15 MMBTU/hr (each)
PL2-VF1	Vacuum forming machine – form station & oven station	9 VAC 5-80-720 B	VOC	-
PL2-VF2	Vacuum forming machine – form station & oven station	9 VAC 5-80-720 B	VOC	-
PL2-PAINT-OV2	Infrared Drying/Curing Oven	9 VAC 5-80-720 C	-	0.504 MMBTU/hr
PL3-FOAM7	Carousel foam production station (Plant 3) – rubinate/rubiflex foam	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM-SM	Foam station – EA foam	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM2	Carousel foam production station (Plant 3) – white foam	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM4	Conveyorized foam production (Plant 3) – white foam	9 VAC 5-80-720 B	VOC HAPs	-
PL3-ABS Welder	Saturn (Service)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-Sandblast	Sand Blast Machine – Maintenance Shop	9 VAC 5-80-720 B	PM-10	-
BLR-1	York-Shipley Fire Tube Boiler	9 VAC 5-80-720 C	-	5 MMBtu/hr
PL1-HP-Cleaner	Hi-pressure Mold Cleaner	9 VAC 5-80-720 B	VOC, PM-10	-
Resin-Dryers	4 dryer units for ABS & Polycarbonate	9 VAC 5-80-720 B	Criteria Pollutants	-
PL2-Insulators	2 Hot melt machines for insulators	9 VAC 5-80-720 B	VOC	-
PL1-VF1	Vacuum Former	9 VAC 5-80-720 B	HAP	-
PL1-RC1	Adhesive Applicator	9 VAC 5-80-720 B	HAP	-
Room A				
PL1-	Injection Molding	9 VAC 5-80-720 B	VOC	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
RESIN 1	Machine (Plant 1)		HAPs	
PL1-RESIN 2	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 3	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 4	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 19	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 8	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 9	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 71	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL-RESIN 14A	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 73	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 74	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 75	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 76	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 78	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 79	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 81	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
Room B				
PL1-RESIN 6	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 20	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 21	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 22	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 65	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 24	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 25	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-	Injection Molding	9 VAC 5-80-720 B	VOC	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
RESIN 30	Machine (Plant 1)		HAPs	
PL1-RESIN 31	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 32	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 34	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 35	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 36	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 37	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 63	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
Room C				
PL1-RESIN 5	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 26	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 27	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 28	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 29	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 38	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 39	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 40	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 41	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 42	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 43	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 44	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 66	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 10	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 11	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL3-RESIN 12	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 15	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 18	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 23	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 48	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 49	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 50	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 51	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 69	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 70	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 83	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 56	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 57	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 58	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 59	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 60	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 53	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 64	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 47	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 67	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 68	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 72	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 82	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-

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

IAC did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the Northern Virginia Daily, Strasburg, Virginia, on August 27, 2013. EPA was sent a copy of the draft permit and notified of the public notice on August 26, 2013. There are two affected states. West Virginia, one of the two affected states, was sent a copy of the public notice via electronic mail dated August 27, 2013. Pennsylvania, though not an affected state, was sent a letter in error via electronic mail on August 27, 2013, instead of Maryland, the second affected state.

All persons on the Title V mailing list were also sent a copy of the public notice in letters dated August 27, 2013.

Public comments were accepted from August 27, 2013 to September 26, 2013. The EPA comment period ended on October 11, 2013. No comments were received.

ATTACHMENT A
2012 Emission Inventory

ATTACHMENT B

Minor NSR Permit

(dated November 15, 2010 as amended October 7, 2011)