

REQUESTED MODIFICATION

On August 25, 2015, the Valley Regional Office received a request from IAC Strasburg, LLC (IAC Strasburg) dated August 24, 2015, for a significant permit modification to the IAC Strasburg Title V operating permit. The significant permit modification requests the incorporation of the conditions from the existing New Source Review (NSR) permit, issued on January 28, 2015, to modify and operate the plastic automotive interior trim components manufacturing facility in Strasburg, Virginia.

REASON FOR MODIFICATION

IAC Strasburg, LLC has requested a significant modification to the current Title V operating permit, with an effective date of January 8, 2014 and an expiration date of January 7, 2019. This modification will incorporate the addition of two spray coating booths (SB1 and SB2) into the TV permit, per a minor NSR permit dated January 28, 2015.

APPLICABILITY OF 9 VAC 5-80-230

According to 9 VAC 5-80-230, significant modification procedures must be used for those permit modifications that do not qualify as minor permit modifications under 9 VAC 5-80-210 or as administrative amendments under 9 VAC 5-80-200. The modification proposal to the IAC Strasburg Title V operating permit does not meet the specifications for an administrative amendment or a minor permit modification. The Regulations further list criteria, any of which, if met, require use of significant modification procedures. The changes proposed by IAC Strasburg meet the following criterion, as stated in 9 VAC 5-80-230.A.1:

Significant modification procedures shall be used for those permit modifications that involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit.

The IAC Strasburg Title V permit modification requires the establishment of emission limitations, standards, and monitoring through the incorporation of the new applicable requirements in the NSR permit dated January 28, 2015. Since the changes proposed by IAC Strasburg meet at least one criterion listed in 9 VAC 5-80-230 and do not qualify as an administrative amendment or minor permit modification, the changes must be processed as a significant permit modification.

CHANGES TO TITLE V OPERATING PERMIT

The changes made to the Title V permit are described below, and include the requirements from the NSR permit. The Condition numbers refer to the draft Title V permit.

FACILITY INFORMATION

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FACILITY DESCRIPTION - This section has not been changed.

EMISSION UNITS - The Emission Units table was updated to specify changes in the emission units and in the applicable permits for the facility, as follows:

- Spray Booths SB-1 and SB-2 were added.
- The permit dates have been updated from November 15, 2010, as amended October 7, 2011 to the NSR permit issued on January 28, 2015.

SURFACE COATING EQUIPMENT

Limitations: all NSR Condition numbers listed are from the NSR permit dated January 28, 2015.

- TV Condition 3 (NSR Conditions 3 and 5) – Requirement for PM-10 from spray booths to be controlled by dry filters with a control efficiency of no less than 96.9 percent. (State BACT)
- TV Condition 4 (NSR Condition 8) – HVLP spray guns will be used within SB-1 and SB-2 in order to control PM-10 emissions. (State BACT)
- TV Condition 7 (NSR Condition 11) – VOC emissions are controlled by limiting the VOC content of the adhesive used to 0.05 pounds per gallon.
- TV Condition 12 (NSR Condition 21) – VOC emissions are controlled by limiting the combined VOC throughput to 0.42 tons per year.
- TV Condition 17 (NSR Condition 26) – Visible emissions from the spray booths SB-1 and SB-2 are controlled by limiting the opacity to five percent. (State BACT)

Monitoring:

- TV Condition 22 (NSR Condition 14) The Condition is included to continuously measure and monitor the differential pressure drop through the spray booths SB-1 and SB-2.
- TV Condition 23 (NSR Condition 16) The control device used to continuously measure the differential pressure drop in the spray coating booths SB-1 and SB-2 shall be observed by the permittee with a frequency of not less than once per day of operation. The permittee is required to maintain a log of said observations.

Recordkeeping:

- TV Condition 25 (NSR Condition 27)
 - TV 25a (NSR 27a) – Monthly and annual throughput (in gallons) of each coating used in each spray booth, which includes booth SB-1 and SB-2 (combined). Annual throughputs calculated as the sum of consecutive 12-month period.
 - TV 25b (NSR 27b) - Monthly and annual VOC throughput (in tons) of each coating used in each spray booth, which includes SB1 and SB2 (combined). Annual throughputs calculated as the sum of consecutive 12-month period.
 - TV 25d (NSR 27d) - Monthly and annual VOC emissions (in tons) of each coating used in each spray booth, which includes SB1 and SB2 (combined). Annual throughputs calculated as the sum of consecutive 12-month period.
 - TV 25i (NSR 27g) – Operation and control device monitoring records for the dry filter in SB-1 and SB-2.

FACILITY WIDE CONDITIONS – HAZARDOUS AIR POLLUTANTS – This section has not been modified.

HAZARDOUS AIR POLLUTANT CONDITIONS – This section has not been modified.

INSIGNIFICANT EMISSION UNITS – The following insignificant emission units have been removed or renamed per facility requirements.

Current Unit Ref.	Emission Unit Description	Changes
PL4-VF2	Vacuum forming machine – form station & oven station	Renamed from PL2-VF2

Current Unit Ref.	Emission Unit Description	Changes
PL2-OV-GLUE1	Infrared Drying / Curing Oven	Renamed to PL2-GB1-OV
PL3-FOAM7	Carousel foam production station (Plant 3) – rubinate/rubiflex foam	Renamed to PL2-FOAM7
PL3-FOAM-SM	Foam Station – EA Foam	Scrapped
PL3-FOAM2	Carousel foam production station (Plant 3) – white foam	Scrapped
PL3-FOAM4	Conveyorized foam production (Plant 3)	Renamed from PL2-FOAM4
PL2-ABS Welder	Saturn (Service)	Renamed from PL3-ABS Welder
PL1-RESIN81	Injection Molding Machine (Plant 1)	Renamed to PL3-RESIN81
PL1-RESIN14A	Injection Molding Machine (Plant 1)	Scrapped
PL1-RESIN74	Injection Molding Machine (Plant 1)	Renamed to PL3-RESIN74
PL1-RESIN75	Injection Molding Machine (Plant 1)	Scrapped
PL1-RESIN76	Injection Molding Machine (Plant 1)	Renamed to PL3-RESIN76
PL3-RESIN11	Injection Molding Machine (Plant 3)	Renamed to PL1-RESIN11
PL3-RESIN12	Injection Molding Machine (Plant 3)	Renamed to PL1-RESIN12
PL4-RESIN82	Injection Molding Machine (Plant 4)	Renamed to PL1-RESIN82

INAPPLICABLE PERMIT REQUIREMENTS

Compliance Assurance Monitoring is not applicable to the affected units, SB1 and SB2, in this modification.

No new inapplicable permit requirements have been added to the previously identified Flexible Polyurethane Foam Fabrication Operations MACT (40 CFR 63 Subpart M) and the Halogenated Solvent MACT (40 CFR 63 Subpart T).

The provisions of 40 CFR Part 98 – Mandatory Greenhouse Gas Reporting require owners and operators of general stationary fuel combustion sources that emit 25,000 metric tons CO₂e or more per year in combined emissions from such units, to report greenhouse gas (GHG) emissions, annually. The definition of “applicable requirement” in 40 CFR 70.2 and 71.2 does

not include requirements such as those included in Part 98, promulgated under Clean Air Act (CAA) section 114(a)(1) and 208. Therefore, the requirements of 40 CFR Part 98 are not applicable under the Title V permitting program.

As a result of several EPA actions regarding GHG under the CAA, emissions of GHG must be addressed for Title V permit actions after January 1, 2011. The current NSR permit for this facility contains no GHG-specific applicable requirements and there have been no modifications at the facility requiring a PSD permit. Therefore, there are no applicable requirements for the facility specific to GHG.

GENERAL CONDITIONS – This section has not been modified.

STATE-ONLY ENFORCEABLE REQUIREMENTS – This section has not been modified.

PUBLIC PARTICIPATION

The public participation requirements of 9 VAC 5-80-270 apply to significant permit modifications. A public notice regarding the draft permit was placed in the *Northern Virginia Daily* on December 17, 2015. The EPA was sent a copy of the draft permit and notified of the public notice on December 15, 2015. West Virginia and Maryland, the affected states, were sent a copy of the public notice in letters dated December 17, 2015. All persons on the Title V mailing list were also sent a copy of the public notice via either letter or email dated December 17, 2015.

Public comments were accepted from December 17, 2015 to January 19, 2016. No public comments were received. The EPA reviewed the permit and indicated on January 14, 2016 that there were three comments. The three comments were answered to the EPA's satisfaction.

ATTACHMENTS

Attachment A – Minor NSR Permit dated January 28, 2015

Attachment B – Engineering Memorandum for Minor NSR Permit dated January 28, 2015

ATTACHMENT A
Minor NSR Permit dated January 28, 2015

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Engineering Memorandum for Minor NSR Permit dated January 28, 2015