

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: XXXX XX, 2019

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400101
Inspector's Name: Patrick Ballard
Date of Last Inspection: 04/25/2018
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Continental Structural Plastics - Lenoir</p> <p>Facility Address: Continental Structural Plastics - Lenoir 601 Hibriten Drive SW Lenoir, NC 28645</p> <p>SIC: 3083 / Laminated Plastics Plate And Sheet NAICS: 32613 / Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 15A NCAC 02D .0503, .0515, .0516, .0521, & .1806 NSPS: 15A NCAC 02D .0524 – Subpart JJJJ NESHAP: 15A NCAC 02D .1111 – Subparts DDDDD, WWWWW, & ZZZZZ PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 1400101.18A Date Received: 02/06/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04667/T18 Existing Permit Issue Date: 06/29/2016 Existing Permit Expiration Date: 01/31/2019</p>
Kelli Daniels EHS Manager (828) 757-8308 601 Hibriten Drive SW Lenoir, NC 28645	Vinod Shah Director - Health, Safety & Env. Affairs (248) 823-5664 255 Rex Boulevard Auburn Hills, MI 48326	Kelli Daniels EHS Manager (828) 757-8308 601 Hibriten Drive SW Lenoir, NC 28645	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	0.0100	1.11	5.81	0.9300	0.6300	5.77	5.75 [Styrene]
2016	0.0100	1.14	4.55	0.9600	0.5100	4.51	4.49 [Styrene]
2015	0.0100	0.9700	6.93	0.8200	0.1350	6.92	6.88 [Styrene]
2014	0.0200	2.50	6.76	2.10	0.2300	6.67	6.62 [Styrene]
2013	0.0100	2.09	11.47	1.76	0.2300	11.40	10.81 [Styrene]

<p>Review Engineer: David Hughes</p> <p>Review Engineer's Signature: _____ Date: XXXX XX, 2019</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 04667/T19 Permit Issue Date: XXXX XX, 2019 Permit Expiration Date: XXXX XX, 2024</p>
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I. Purpose of Applications

Application No. 1400101.18A

This permitting action is a renewal of an existing Title V permit pursuant to 02Q .0513. The existing Title V permit (**04667T18**) was issued on **June 29, 2016**. The renewal application **1400101.18A** was received on **February 6, 2018**, or at least nine months prior to the original expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

As part of the renewal process, the facility has requested that No. 2 fuel oil be removed from the permit since they no longer burn No. 2 fuel oil for boilers (**ID Nos. B-1 and B-2**) and have no plans to burn it in the future. They just burn natural gas.

II. Facility Description

Continental Structural Plastics – Lenoir (CSP-L) is a plastic automotive parts manufacturing company. Plastic automotive parts are manufactured from Azdel (a polypropylene/fiberglass composite) and from Sheet Molding Compound “SMC” (a polystyrene resin/fiberglass composite). CSP-L also molds plastic parts for the home construction industry (air conditioning bases) and have recently started molding a new type of fiberglass-reinforced polypropylene (DLFT). Additionally, this facility does warm forming (closed molding/cut plastic to dimension and heat to 180°F), injection molding using polypropylene beads (8 machines that operate at temperatures of 300 to 400 °F), thermosetting using SMC (temperatures to 400°F), and thermosetting using polypropylene.

III. History/Background/Application Chronology

February 7, 2014 – Permit No. **04667T16** issued as a TV renewal.

August 14, 2014 – Permit No. **04667T17** issued as a TV administrative amendment. Ownership and name change.

June 29, 2016 – Permit No. **04667T18** issued as a TV state-only modification.

February 6, 2018 – Permit Application **1400101.18A** received as a TV renewal. This application was deemed complete for processing.

April 25, 2018 – Patrick Ballard of the Asheville Regional Office (ARO) completed the annual compliance inspection of the facility.

March 1, 2019 - DRAFT permit sent to Permittee, Supervisor, Regional Office and Tech Services for comment. Vinod C. Shah or Kelli Daniels of CSP-L replied via e-mail on **March 5 and 11, 2019** with minor changes to the Air Permit Review. Samir Parekh of Tech Services replied via e-mail on **March 11, 2019** with no comments. Patrick Ballard of MRO states via e-mail on **March 27, 2019** that he has reviewed the draft permit and permit review and has no comments.

XXXX XX, 2019 – DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public comment period ended **XXXX XX, 2019** with the receipt of no comments. The 45-day EPA review period ended **XXXX XX, 2019** with the receipt of no comments.

XXXX XX, 2019 – Air Permit No. **04667T19** was issued

IV. Permit Modifications/Changes and ESM Discussion

Page	Section	Description of Change
Cover letter	---	Modified to reflect current permit number, issue and effective dates.
All	Headers	Amended permit revision number
Attachments and Pages 1-30	Entire permit, where applicable	Modified to reflect current permit number, issue and effective dates.
Page 4	Section 1	Added 15A NCAC 02D .1111 MACT DDDDD for Boilers B-1 and B-2 Removed No. 2 fuel oil for Boilers B-1 and B-2
Page 4	2.1 A Table	Added 15A NCAC 02D .1111 MACT DDDDD Removed No. 2 fuel oil
Pages 4-8	2.1 A	Removed No. 2 fuel oil
Pages 6-8	2.1 A.5	Added 15A NCAC 02D .1111 MACT DDDDD language
Page 8	2.1 B Table	Removed 15A NCAC 02D .0958 and 15A NCAC 02D .1100
Page 10	2.1 C.2.c	Updated Shell Language in 15A NCAC 02D .0521
---	2.2 A.1	Removed 15A NCAC 02D .0958
Pages 20-29	General Conditions	Updated shell conditions (v5.3, 08/21/2018)
Page 30	List of Acronyms	Changes Alternate to Alternative for acronym AOS

There were minor modifications to the equipment descriptions needed in Title V Equipment Editor (TVEE). As requested by the applicant, references to No. 2 fuel oil firing have been removed from the equipment descriptions.

V. Regulatory Review – Emission Source Specific Limitations:

The facility is currently subject to the following regulations:

- 15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 02D .0521, Control of Visible Emissions
- 15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart JJJJ)
- 15A NCAC 02D .1109, 112(j) Case-by-Case MACT
- 15A NCAC 02Q .1111, Maximum Achievable Control Technology (40 CFR 63, Subparts DDDDD, WWW, and ZZZZ)
- 15A NCAC 02Q .1806, Control and Prohibition of Odorous Emissions (State-Enforceable only)

Further discussion of these regulations is included below and in section VI.

15A NCAC 02D .0503, “Particulates from Fuel Burning Indirect Heat Exchangers”

The natural gas-fired boilers (ID Nos. B-1 and B-2) are subject to 02D .0503. The allowable particulate emission rate is 0.6 pounds per million Btu heat input. The boilers are expected to be in compliance with 02D .0503, and no monitoring recordkeeping, or reporting is required. Continued compliance is expected. This permit renewal does not affect this status. As requested by the applicant, No. 2 fuel oil firing was removed from this permit condition.

15A NCAC 02D .0516, “Sulfur Dioxide Emissions from Combustion Sources”

The natural gas-fired boilers (ID Nos. B-1 and B-2) and Liquefied petroleum gas (LPG) and natural gas-fired emergency generators (ID Nos. MA-16 and MA-100) are subject to 02D .0516. Emissions

of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. No monitoring, recordkeeping, or reporting is required for these sources. Natural gas is inherently low enough in sulfur to always be in compliance with this rule. Emissions of sulfur dioxide from these emergency generators shall not exceed 2.3 pounds per million Btu heat input. No monitoring, recordkeeping, or reporting is required from the combustion of LPG in this emergency generator MA-16 or the combustion of natural gas in this emergency generator MA-100. Continued compliance is expected. This permit renewal does not affect this status. As requested by the applicant, No. 2 fuel oil firing was removed from this permit condition.

15A NCAC 02D .0521 “Control of Visible Emissions”

The following emission sources are subject to 02D .0521:

- Natural gas-fired boilers (ID Nos. B-1 and B-2) – No monitoring, recordkeeping, or reporting is required when natural gas is fired in the boilers.
- Plastic parts sanding/drilling/etching operations (ID Nos. ES-2 and ES-3) – The facility has to conduct monthly visible emission observations of the bagfilters to ensure compliance with this rule.
- LPG-fired emergency generator (ID No. MA-16) and natural gas-fired emergency generator (ID No. MA-100) – No monitoring, recordkeeping, or reporting is required when natural gas is fired in the boilers.

Continued compliance is expected. This permit renewal does not affect this status.

15A NCAC 02D .0515, “Particulates from Miscellaneous Industrial Processes”

The plastic parts sanding/drilling/etching operations are subject to 02D .0515. The facility has to conduct monthly external visible inspections and annual internal inspections of the bagfilters (ID Nos. CD-2 and CD-3) to ensure compliance with this rule. Continued compliance is expected. This permit renewal does not affect this status.

15A NCAC 02D .1806, “Control of Odors”

The facility is currently subject to this state-enforceable only regulation that provides for the control and prohibition of objectionable odorous emissions. Continued compliance with this regulation is expected. This permit renewal does not affect this status.

15A NCAC 02D .0958, “Work Practices for Sources of Volatile Organic Compounds”

The applicability of this regulation has been modified and as such no longer applies to this facility. The regulation has been removed from the permit.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

The facility is currently subject to New Source Performance Standard (NSPS) 40 CFR 60, Subpart JJJJ “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.” The permit includes the detailed requirements for the natural gas-fired emergency generator (ID No. MA-100). Continued compliance with this regulation is expected. This permit renewal does not affect this status.

NESHAP

The facility is currently subject to the following NESHAP/MACT requirements.

1. 15A NCAC 02D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers

Beginning October 22, 2013, CSP-L is required to use best combustion practices when operating boilers (**ID Nos. B-1 and B-2**). These practices include an annual inspection of each boiler and proper maintenance. The CAA § 112(j) standard will be applicable until **May 19, 2019**. After

that date, CSP-L must follow the applicable CAA § 112(d) standard “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.” The permit has been updated to include the effective dates. Compliance is expected.

2. 15A NCAC 02D .1111 – Maximum Achievable Control Technology for 40 CFR 63, Subpart DDDDD

For Boilers (**ID Nos. B-1 and B-2**) designed to burn natural gas with a heat input capacity equal to or less than 10 million Btu per hour, the Permittee shall comply with all applicable provisions, including monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 “Maximum Achievable Control Technology” (MACT) as promulgated in 40 CFR 63, Subpart DDDDD “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters” and Subpart A “General Provisions.” The Permittee shall be subject to the requirements of this standard starting **May 20, 2019**. As noted above, detailed permit conditions have been added as a part of this permit renewal.

3. 40 CFR Part 63, Subpart WWWW for Reinforced Plastics Composite Production

The compression molding presses (e.g. seventeen thermosetting presses) are subject to this regulation. The current permit includes detailed Subpart WWWW language as it applies to the existing sources at CSP-L. This permit renewal does not affect this status.

4. 40 CFR Part 63, Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines

The liquid propane gas-fired emergency generator (**ID No. MA-16**) and the natural gas-fired emergency generator (**ID No. MA-100**) are subject to this regulation. The current permit includes detailed Subpart ZZZZ requirements. This permit renewal does not affect this status.

PSD

This facility is currently classified as minor for PSD/NSR purposes. This facility is located in Caldwell County that is currently in attainment for all pollutants. This permit renewal does not affect this status.

112(r)

The facility is not currently subject to the 112(r) “Prevention of Accidental Releases” requirements because no chemicals are stored in amounts greater than the applicability threshold of the regulation. This permit renewal does not affect this status.

CAM

40 CFR Part 64 is applicable to any pollutant-specific emission unit, if the following three conditions are met:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- the unit’s pre-control potential emission rate exceeds either 100 tpy (for criteria pollutants) or 10/25 tpy (for HAP’s).

The sanding/drilling/etching operations (ID Nos. ES-2 and ES-3) are not considered to be major Pollutant Specific Emission Units (PSEUs) and do not have an uncontrolled potential to emit greater than 100 tons per year of PM. Therefore, CAM is not applicable to this facility. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

The facility requested to remove air toxic conditions (15A NCAC 02D “Control of Toxic Air Pollutants) on March 14, 2016. Jeff Twisdale of Division of Air Quality Permitting Section removed the air toxic conditions from the permit as part of a Session Law 2012-91 and pursuant to 15A NCAC 02Q .0702(a)(27)(B) unacceptable risk analysis. Air Permit 04667T18 was issued on June 29, 2016. See Jeff Twisdale’s 6/29/16 air permit review for more details.

VIII. Facility Emissions Review

See Table in the header for a summary of the actual emissions as reported to DAQ from the years 2013 to 2017.

IX. Stipulation Review

The facility was inspected by Patrick Ballard on **April 25, 2018**. Based on his observations the facility appeared to be in compliance with their Title V permit requirements.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521. There are no affected States/area within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer’s seal was not required for this renewal.

A zoning consistency determination was not required for this renewal.

ARO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with ARO’s recommendation to issue the renewal air permit.