

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2011**

**Region:** Washington Regional Office  
**County:** Wayne  
**NC Facility ID:** 9600217  
**Inspector's Name:** Mike Smithwick  
**Date of Last Inspection:** 01/27/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Cooper-Standard - Fedelon Trail  <b>Facility Address:</b> Cooper-Standard - Fedelon Trail 308 Fedelon Trail Goldsboro, NC 27530  <b>SIC:</b> 3069 / Fabricated Rubber Products, Nec <b>NAICS:</b> 326299 / All Other Rubber Product Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 9600217.06B <b>Date Received:</b> 09/27/2006 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 05559/T14 <b>Existing Permit Issue Date:</b> 11/30/2007 <b>Existing Permit Expiration Date:</b> 10/31/2012
Susan Palmer HSE Specialist (919) 735-5394 308 Fedelon Trail Goldsboro, NC 27530	Ralph Ives Plant Manager (919) 735-5394 308 Fedelon Trail Goldsboro, NC 27530	Susan Palmer HSE Specialist (919) 735-5394 308 Fedelon Trail Goldsboro, NC 27530	
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2011</b>		<b>Comments / Recommendations:</b> Issue 05559/T15 <b>Permit Issue Date:</b> <b>date, 2011</b> <b>Permit Expiration Date:</b> <b>date, 2016</b>	

**I. Purpose of Application**

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05559T14**) was issued as a modification on **November 30, 2007**, with an expiration date of **October 21, 2012\***. The renewal application was received on **September 27, 2006**, 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.

*\* This permit shall expire on the earlier of **October 31, 2012** or the renewal of permit **05559T13** has been issued or denied.*

## II. Facility Description

The facility is a manufacturer of rubber automotive products such as moldings and strippings. Rubber and metal coil are purchased as raw materials. The metal is then stamped. The rubber and metal strips, if applicable, are fed through extrusion dies and the product is cured and finished with one or more of the following: flocking, plastic and metal. The intermediate product is then cut to size and painted if needed.

## III. History/Background/Application Chronology

**July 18, 2002** – Permit **05559T09** was issued as an Initial Title V air permit.

**May 16, 2003** – Permit **05559T10** was issued as a 502(b)(10) modification for the addition of **ES-F501** and **F101** and the modification of **F100**.

**October 3, 2005** – Permit **05559T11** was issued as a 502(b)(10) modification for the addition of **L3COAT** and a plasma oven, the deletion of **L3glue**, and the replacement of a drying oven as part of **ES-3**.

**December 8, 2005** – Permit **05559T12** was issued as an administrative amendment to correct a reporting date.

**March 7, 2006** – Permit **05559T13** was issued as an administrative amendment to remove an incorrect reference to **ES-3** in both the 112(g) and 2D .1100 permit conditions.

**September 27, 2006** – Permit application **9600217.06B** was received for the renewal of the current title V air permit. Permit application was deemed complete for processing. Application was assigned to Kevin Godwin for processing.

**April 16, 2007** – Permit application **9600217.06B** was reassigned to Mark Cuilla for processing.

**November 30, 2007** – Permit **05559T14** was issued as a minor modification for a plant-wide adhesive substitution in addition to the removal of equipment. As this permit was issued after the original expiration date of **June 30, 2007**, the expiration date was extended for five years with the following asterisked language being included: *“This permit shall expire on the earlier of **October 31, 2012** or the renewal of permit **05559T13** has been issued or denied.”*

**December 12, 2010** – DRAFT permit sent to Permittee and WARO for comment prior to public notice and EPA review periods. The WARO did not have any comments on the draft permit (see **December 15, 2010** email to Mark Cuilla from Mike Smithwick). The Permittee provided the following comments via email on **January 13, 2010**:

1. Please update the facility name to “Cooper Standard” (remove “Automotive”);
2. Add on flock booth which services both Line 1 and Line 2 to the list of insignificant activities;
3. Remove extruder (**ID No. F101**) as it has been taken out of service;
4. Change “glue booth” (**ID No. 106**) to “adhesive booth”;
5. Change “glue booth” (**ID No. 206**) to “adhesive booth”;
6. Add three extruders to line ES4;
7. Change “glue table” (**ID No. 405**) to “adhesive booth”;
8. Remove extruder (**ID No. F501**) as it has been taken out of service;
9. Add one extruder to line ES6; and

10. Correct spelling error on Page 14 (“Avoidance”).

**Date, 2011** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

#### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed all references to Part II (here and throughout the permit)
All	Header	-amended permit revision number
3-4	Equipment table	-removed asterisk and associated language for ID No. ES3-L3COAT
4	2.1 A	-detailed equipment description
5	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.3.a	-added ID numbers -corrected testing rule cross reference -updated shell language -added “no reporting” language -added ID numbers -corrected testing rule cross reference -updated shell language and added ID numbers -added ID numbers
6	2.1 A.3.b 2.1 A.3.c 2.1 A.3.d 2.1 A.3.e	-corrected testing rule cross reference -updated shell language -added shell recordkeeping language -updated shell language
7	2.1 B 2.1 B.1.a 2.1 B.1.b 2.1 B.1.c 2.1 B.1.d	-detailed equipment description (combined former Section 2.1 B and C and renumbered subsequent sections) -added ID numbers -corrected testing rule cross reference -updated shell language -added “no reporting” language
8	2.1 B.2.a 2.1 B.2.b 2.1 B.2.c 2.1 B.3.a 2.1 B.3.b 2.1 B.3.c	-added ID numbers -corrected testing rule cross reference -updated shell language and added ID numbers -added ID numbers -corrected testing rule cross reference -updated shell language and added ID numbers
8-9	2.1 B.3.d	-added shell reporting language
9	2.1 B.3.e 2.1 C (table)	-updated shell language -corrected rule cross reference
10	2.1 C.1.b 2.1 C.2.b	-corrected testing rule cross reference -corrected testing rule cross reference
11	2.1 C.3.b 2.1 C.3.c	-corrected testing rule cross reference -updated shell language and corrected cross reference
11-12	2.1 D (table)	-corrected rule cross reference
12	2.1 D.1.b 2.1 D.1.c 2.1 D.1.d 2.1 D.2.b	-corrected testing rule cross reference -updated shell language -added “no reporting” language -corrected testing rule cross reference

Page	Section	Description of Change
12-13	2.1 D.2.c	-updated shell language
13	2.1 D.2.d 2.1 D.2.e	-added shell recordkeeping language -updated shell language
14	2.2 A (table) 2.2 A.1 2.2 A.1.b	-corrected rule cross reference -corrected rule cross reference -corrected rule cross reference
15	2.2 A.1.c 2.2 B (table)	-corrected rule cross reference -clarified emission limits
16	2.2 B.1.c-e	-added shell 2D .0958 monitoring/recordkeeping/reporting language
17-18	2.2 B.3 (table)	-added all TPER limits previously addressed
19-29	General Conditions	-updated shell conditions (v3.3)
30	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell

ESM was modified following the receipt of the Permittee’s comments on the draft permit to remove applicable equipment as described above.

## V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds  
15A NCAC 2D .1100, Control of Air Toxics  
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .1112, 112(g) Case-By-Case MACT)  
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document.

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

**NSPS** – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is currently subject to an avoidance condition for 15A NCAC 2D .1112 “112(g) Case-by-Case Maximum Achievable Control Technology” for four of the existing lines (**ID Nos. ES5, ES6, ES7, and ES-750**). To ensure compliance with the 10 tons per year of any individual hazardous air pollutant (HAP) and 25 tons per year any combination of HAPs, the Permittee is required to monitor the amount of coatings applied at these lines. Recordkeeping and reporting requirements are also included. These four lines were part of a permit modification prior to the promulgation of any potential facility-wide MACT standard under Section 112(d) for this source category. As such per 15A NCAC 2D .1112, DAQ would have had to require that they comply with a “State MACT” in the absence of federal requirements. The Permittee chose to avoid this requirement by requesting the emission limitation. This permit renewal does not affect this status.

As part of this permit renewal process, a review of the currently promulgated MACT standards under Section 112d was made for the facility in order to evaluate applicability to 40 CFR 63, Subpart

MMMM “National Emission Standards for Hazardous Air Pollutants from Surface Coating of Miscellaneous Metal Parts and Products” and 40 CFR 63, Subpart PPPP “National Emission Standards for Hazardous Air Pollutants from Surface Coating of Plastic Parts and Products.” EPA Region 4 was contacted during this renewal process to aide in the determination of applicability. Through a lengthy process of back and forth between EPA and the Permittee (e.g., the Permittee providing EPA with process descriptions, MSDS, rubber components, etc), EPA has determined that:

1. the extrusion process described to EPA by the Permittee is not a rubber-to-metal coating operation as defined by Subpart MMMM; therefore, MMMM does not apply; and
2. the concentrations of resin in the rubbers as supplied by the Permittee are in such low concentrations that they do not qualify as plastics as defined by Subpart PPPP; therefore, PPPP does not apply.

There is not currently, a MACT Subpart applicable to the processes at this facility.

**PSD** – The facility is not currently subject to any Prevention of Significant Deterioration standards. Potential emissions of all regulated pollutants remain below the major source thresholds for PSD applicability. This permit renewal does not affect this status.

**112(r)** – The facility is not subject to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater that the applicability threshold. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no control devices installed at this facility; therefore, CAM does not apply. This permit renewal does not affect this status.

## VII. Facility Wide Air Toxics

The facility is currently subject to both modeled toxic air pollutant emission rates per 15A NCAC 2D .1100 and for toxic air pollutant emission rates per 15A NCAC 2Q .0711. The following table lists the applicable standards:

<b>Emission Sources</b>	<b>Toxics</b>	<b>Emission Limits</b>	<b>Standard</b>
Facility wide	Benzene Carbon Disulfide 1,3-Butadiene	118.7 pounds/year 70.6 pounds/day 22.3 pounds/year	15A NCAC 2D .1100
Facility wide	MIBK  Toluene  Xylene	52 pounds/day 7.6 pounds/hour 98 pounds/day 14.4 pounds/hour 57 pounds/day 16.4 pounds/hour	15A NCAC 2Q .0711

This permit renewal does not affect this status.

### VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventory from the facility as compared to the potential emissions for the same pollutant:

<b>Pollutant(s)</b>	<b>2008 Actual Emissions (tpy)</b>	<b>2009 Actual Emissions (tpy)</b>	<b>Potential Emissions (tpy)*</b>
CO	1.66	1.34	16.19
NO <sub>x</sub>	1.98	1.59	19.27
PM <sub>10</sub>	0.25	0.19	41.47
SO <sub>2</sub>	0.01	0.01	0.12
VOC	31.70	32.70	203.74
Total HAPs/TAPs	6.69	6.07	46.7

\* Potential emissions based on **June 24, 2005** permit application (form D1)

### IX. Stipulation Review

The facility was last inspected by Michael Smithwick of the WARO on **January 27, 2010**. He notes that "the facility appeared to operate in compliance with all applicable regulations and permit conditions at the time of the inspection." He did not note any needed permit modifications as part of his inspection report.

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

### XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

WARO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WARO's recommendation to issue the renewed air permit.