

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date:**

**Region:** Raleigh Regional Office  
**County:** Nash  
**NC Facility ID:** 6400061  
**Inspector's Name:** Will Wike  
**Date of Last Inspection:** 05/24/2007  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Fawn Plastics Company, Inc.</p> <p><b>Facility Address:</b>                  Fawn Plastics Company, Inc.                  10235 US 264 Alt                  Middlesex, NC 27557</p> <p><b>SIC:</b> 3089 / Plastics Products, Nec  <b>NAICS:</b> 32613 / Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>			<p><b>SIP:</b> 2D .0515, .0521, and .0958  <b>NSPS:</b> NA  <b>NESHAP:</b> 2Q .0317 (MACT PPPP Avoidance) &amp; 2Q .0512 (Permit Shield for GACT Subpart 6H)  <b>PSD:</b> NA  <b>PSD Avoidance:</b> 2Q .0317 (VOCs)  <b>NC Toxics:</b> 2Q .0711 and 2D .1100  <b>112(r):</b> NA  <b>Other:</b> 2D .1806</p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 6400061.06A  <b>Date Received:</b> 02/27/2006  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 01058/T11  <b>Existing Permit Issue Date:</b> 01/31/2002  <b>Existing Permit Expiration Date:</b> 01/31/2007</p>
Mitch Gaskey EHS Director (252) 235-6408 10235 US 264 Alt Middlesex, NC 27557	Keith Langley VP of Operations (252) 235-4011 10235 US 264 Alt Middlesex, NC 27557	Mitch Gaskey EHS Director (252) 235-6408 10235 US 264 Alt Middlesex, NC 27557	
<p><b>Review Engineer:</b> Jeff Twisdale</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>		<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 01058/T12  <b>Permit Issue Date:</b> _____  <b>Permit Expiration Date:</b> _____</p>	

**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 (01058T11) was issued on February 28, 2002 and expired on January 31, 2007. The renewal application was initially received on February 27, 2006 by Raleigh Regional Office (RRO) and deemed complete on April 28, 2006. The renewal application was received at least nine months prior to expiration date; therefore, the existing permit will **not** expire until the renewal permit has been issued or denied with submittal of a complete and timely application, and the terms and conditions of the existing permit will remain in effect until the renewal permit has been issued or denied pursuant to 2Q .0513.

**II. Facility Description**

Fawn Plastics Company, Inc. (Fawn) molds and paints plastic interior components for Chrysler, General Motors, and Ford cars and trucks, including radio bezels, knobs, dials, and cell phone lenses/facing. Fawn has 25 injection molding machines with interchangeable molds. Fawn had employed as many as 350 people and produced 30,000 bezels per week for Ford and 34,000 bezels per week for Chrysler; however, some of the production has been shifted to China and Mexico in recent years. The facility is subject to the Title V program because potential volatile organic compound (VOC) emissions exceed the 100 tons per year (tpy) threshold.

### III. History/Background/Application Chronology

Please see the attached IBEAM Comprehensive Report.

### IV. Permit Modification/Changes

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

Old Page(s)	New Page(s)	Section	Description of Change(s)
NA	NA	Cover Letter	-Updated responsible official name and address and official company / facility name for the permit
NA	NA	Attachment	-Updated insignificant activity list by adding the injection molding machines and paint mix room
3-4	3	Part 1, Section 1 (Equipment table) and throughout the permit	-Updated emission source descriptions and ID Nos. to more appropriately reflect their identification
5, 7 & 8	4	Part 1, Section 2.1 A (Limits/Standards table & requirements)	-Combined applicable requirements for all permitted sources into one group/table since most have the same specific and facility-wide requirements
NA	4	Part 1, Section 2.1 A (Limits/Standards table)	-Added 2Q .0317 restriction for HAP emissions (< 10 tpy of any HAP and < 25 tpy of any combination of HAPs) to avoid becoming major for HAPs (2D .1111)
NA	9	Part 1, Section 2.2 A.5 (Specific Condition)	-Added 2Q .0317 specific condition to avoid becoming major for HAPs (2D .1111)
12 & 13	9 & 10	Part 1, Section 2.2 B (Specific Condition)	-Updated reporting requirement (kept quarterly) for 2Q .0317 specific condition to avoid 2D .0530 for VOCs
13	10	Part 1, Section 2.2 C (Specific Condition)	-Updated reporting requirement (kept quarterly) for 2Q .0317 specific condition to avoid 2D .0530 for VOCs
NA	11	Part 1, Section 2.3 A (Specific Condition)	-Added Permit Shield for Non-applicable Requirements (GACT Subpart HHHHHH)
14-21	12-19	General Conditions	-Updated all general conditions with latest version

### V. Regulatory Review

The facility is subject to the following regulations:

- 15A NCAC 2D .0515: Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0521: Control of Visible Emissions
- 15A NCAC 2D .0958: Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2H .0711: Emission Rates Requiring a Permit
- 15A NCAC 2D .1100: Control of Toxic Air Pollutants
- 15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0317: Avoidance Conditions for 2D .0530 (PSD)
- 15A NCAC 2Q .0317: Avoidance Conditions for 2D .1111 (specifically MACT Subpart PPPP)
- 15A NCAC 2Q .0512: Permit Shield (Non-applicability Condition for 2D .1111 specifically GACT Subpart HHHHHH)

Two new or additional requirements [2Q .0317 (Avoidance of MACT) and 2Q .0512 (Non-applicability of GACT Subpart HHHHHH)] will be added to this renewed permit as no modifications to the Initial Title V Permit have occurred to date. Therefore, a regulatory review for those requirements will be included in this document (See NESHAP Section VI below).

The other existing regulations and associated specific conditions along with their monitoring, recordkeeping and reporting requirements will still apply [noting that the facility requested that the 2Q .0317 (PSD Avoidance) reporting will remain quarterly]. Continued compliance with the above regulations and the associated specific conditions is expected.

## **VI. NSPS, NESHAP, PSD, Attainment Status, 112(r) and CAM**

### **NSPS**

These standards do not apply to this facility.

### **NESHAP/MACT/GACT**

Based on a review of the facility's current operations, the facility would have been subject to the **National Emission Standards for Hazardous Air Pollutants (NESHAP)**, also known as **Maximum Achievable Control Technology (MACT)**, for the **Surface Coating of Plastic Parts and Products** since the facility's potential HAP emissions (mainly toluene were greater than 10 tons per year (tpy) per individual HAP and greater than 25 tpy for the aggregate HAP emissions; however, the facility is considered to be a minor source of HAPs since DAQ follows EPA's "Once In, Always In" policy (dated May 16, 1995) for MACT on a case-by-case basis. Keith Overcash, DAQ Director, decided that the facility had remained minor for HAPs since 2005 after reviewing information that the facility submitted a notification form to DAQ on June 9, 2005 [*prior to the compliance date (April 19, 2007) for existing sources of this MACT*] that their actual HAP emissions would remain below 10 tpy per individual HAP and less than 25 tpy for the aggregate HAP emissions, and that those HAP emissions had been confirmed during the review of the 2005 and 2006 annual emissions inventories. Also, the facility explicitly requested the avoidance of MACT Subpart PPPP via e-mail received May 31, 2007. The notification form and e-mail request were submitted by Mr. Mitch Gaskey of Fawn. Therefore, this facility is **not** considered to be a major source of HAPs **nor** subject to any MACT.

However, since the facility is now considered to be a minor (area) source of HAPs, the facility could be subject to an area source standard, also known as **Generally Available Control Technology (GACT)**. Based on a review of the facility's current operations, the facility would be subject to the **NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**, also known as **GACT Subpart HHHHHH**; however, the facility is **not** subject to GACT Subpart HHHHHH since the owner or operator does **not** perform any paint stripping operations that involve the use of chemical strippers that contain methylene chloride in the paint removal process **nor** does the owner or operator spray apply coatings containing target HAP, defined under 40 CFR 63.11180 as compounds of chromium, lead, manganese, nickel or cadmium, to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment. A permit shield pursuant to 2Q .0512(a)(1)(B) for this non-applicable requirement will be placed in the permit in order to prevent any future confusion on this matter.

### **PSD**

This existing facility is considered to be a major stationary source for PSD purposes because the facility does have the potential to emit more than 250 tpy of VOCs as a result of having two separate PSD Avoidance limits (250 tpy each).

The minor source baseline date has been triggered for Nash County for PM-10 and SO<sub>2</sub>. Therefore, PSD increment will need to be tracked for PM-10 and SO<sub>2</sub> in the future. No increase in any emissions is expected during the renewal process.

### **Attainment Status**

This facility is located in Nash County that is currently in attainment for all pollutants. No increase in emissions is expected during the renewal process.

### **112(r)**

This facility is **not** subject to Section 112(r) of the Clean Air Act requirements because it does **not** store any of the regulated substances in quantities above the thresholds in the Rule.

## CAM

40 CFR 64 requires that a continuous 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. This facility does **not** utilize any control devices to reduce VOC emissions; therefore, CAM does **not** apply.

## VII. Facility-wide Air Toxics

The facility has already triggered the state-only toxics regulations (2Q .0700 and 2D .1100). Also, the facility does **not** have to submit a facility-wide air toxics review required by the compliance date of the last applicable MACT pursuant to 2Q .0705 since the facility is **not** subject to a MACT or GACT (see NESHAP Section VI above). Therefore, the facility is **not** subject to a facility-wide air toxics review at this time, and the existing limits and conditions will remain the same.

## VIII. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on visual observations and review of records at the time of the inspection (05/24/2007 by Will Wike of RRO), this facility appeared to be operating in compliance with Air Quality standards and regulations.

## IX. Facility Emissions Review

There is no change in emissions for this renewal. The following table represents facility-wide actual emissions as submitted by the facility in its latest (2006) emissions inventory:

Pollutant	2006 Emissions (tons per year)
Nitrogen Oxides	0.00
Carbon Monoxide	0.00
Particulate Matter	0.78
Sulfur Dioxide	0.00
Volatile Organic Compounds	75.0
(All other HAPs/TAPs) / Largest Individual HAP (Toluene)	(12.3) / (8.99)

## X. Stipulation Review

The permit modification changes were incorporated into the permit (see table of changes in Section IV of this document).

## XI. Public Notice / EPA and Affected State Review

Pursuant to 2Q .0521, a notice of the draft Title V Permit will 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 will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice is provided to the public under 2Q .0521 above.

## XII. Conclusions, Comments, and Recommendations

- A. A professional engineer's seal was **not** required for this renewal.
- B. A consistency determination was **not** required for this renewal.
- C. DAQ recommends permit issuance once the public notice and EPA review periods have been completed.