

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date: TBD**

**Region:** Mooresville Regional Office  
**County:** Catawba  
**NC Facility ID:** 1800533  
**Inspector's Name:** Joe Foutz  
**Date of Last Inspection:** 07/26/2022  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>	<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> International Cushioning Company, LLC - Hickory</p> <p><b>Facility Address:</b>                  International Cushioning Company, LLC - Hickory                  6005 North Carolina Highway 10 West                  Hickory, NC 28602</p> <p><b>SIC:</b> 3086 / Plastics Foam Products  <b>NAICS:</b> 32614 / Polystyrene Foam Product 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> 02D .1806, .02D .2100, 02Q .0317, 02Q .0711  <b>NSPS:</b> n/a  <b>NESHAP:</b> n/a  <b>PSD:</b> n/a  <b>PSD Avoidance:</b> 02Q .0317 (VOC)  <b>NC Toxics:</b> 02Q .0711  <b>112(r):</b> RMP required  <b>Other:</b> 02Q .0317 (MACT Avoidance)</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> 1800533.22A  <b>Date Received:</b> 06/21/2022  <b>Application Type:</b> Renewal/Modification  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 09489/T09  <b>Existing Permit Issue Date:</b> 03/12/2019  <b>Existing Permit Expiration Date:</b> 01/31/2023</p>
Harry (Buddy) Bussey, III President (866) 311-9600 240 Boundary Road Marlboro, NJ 07746	Harry (Buddy) Bussey, III President (866) 311-9600 240 Boundary Road Marlboro, NJ 07746	Harry (Buddy) Bussey, III President (866) 311-9600 240 Boundary Road Marlboro, NJ 07746	

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	---	170.30	---	0.3100	---	--- [---]
2020	---	---	215.94	---	0.3100	---	--- [---]
2019	---	---	250.82	---	0.2900	0.1100	0.1100 [Styrene]
2018	---	---	307.75	---	0.2700	0.2380	0.2380 [Styrene]
2017	---	---	314.78	---	0.3992	0.4145	0.4145 [Styrene]

<p><b>Review Engineer:</b> Russell Braswell</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p>Issue 09489/T10  <b>Permit Issue Date:</b> TBD  <b>Permit Expiration Date:</b> TBD+5 years</p>
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## 1. Purpose of Applications:

International Cushioning Company, LLC - Hickory (ICC; the facility) currently operates a factory in Catawba County under Title V permit 09489T09 (the existing permit). The existing permit is set to expire on January 31, 2023. ICC submitted this application in order to renew the permit. Because ICC submitted this application at least six months before the expiration date of the existing permit, the existing permit will remain in effect, regardless of expiration date, until the renewed permit is issued.

In addition to renewing the permit, ICC requested modifications to the permit. These changes are discussed in detail in Section 5.

## 2. Facility Description:

This facility produces expanded plastic foam from polystyrene and polyethylene. The facility receives pellets of plastic and injects them with a blowing agent. The plastic pellets are melted together and then sent through an extruder at high temperature and pressure. When the melted plastic exits the extruder, the blowing agent contained in the pellets expands rapidly, producing a foam. Off-spec and waste product can be ground up and reprocessed in the extrusion process.

At this facility, the blowing agent has historically been pentane and isobutane, but is changing to solely isobutane with this application. Both blowing agents are 100% VOC. During the extrusion process, some of the blowing agent is emitted to the atmosphere. In addition, when extruding polystyrene, a small amount of styrene is emitted to the atmosphere.

In addition to the plastic foam extrusion, the facility operates several supporting activities such as storage silos and boilers.

## 3. Title V Permit Modifications Following the Previous Permit Renewal:

- February 6, 2018 Permit revision T08 issued. This revision was a renewal and modification of the Title V. The permit was modified to include a new emission factor for polystyrene scrap reprocessing.
- March 12, 2019 Permit revision T09 issued. This revision was a significant modification that changed the emission factor for polyethylene foam extrusion to 0.6 pounds of VOC per pound of blowing agent used.

## 4. Application Chronology:

- June 21, 2022 Application received.
- July 25, 2022 Email sent to Bob Griffin<sup>1</sup> requesting clarification of the emission source descriptions in the application versus the existing permit.
- July 28, 2022 Email from Melinda Greene<sup>2</sup> responding to the above request.

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<sup>1</sup> CEO of Shield Engineering, a firm representing ICC.

<sup>2</sup> Senior Engineer with Shield Engineering.

- August 3, 2022 Email to Melinda Greene requesting clarification of styrene emission calculations. A response was received later that day.
- August 9, 2022 Initial internal draft to RCO staff.
- September 1, 2022 Draft to RRO, SSCB, and RPS staff.
- XXXXX The Public Notice and EPA Review periods began.
- XXXXX The Public Notice period ended.
- XXXXX The EPA Review period ended.
- XXXXX Permit issued.

## 5. Changes to the Existing Permit:

### a. New blowing agent throughout the facility:

ICC currently uses pentane and isobutane as the blowing agent when expanding polystyrene and polyethylene. According to the application, ICC plans to use solely isobutane instead of pentane. Both materials are volatile organic compounds (VOC), and neither are hazardous or toxic air pollutants (HAP/TAP). ICC is making this change based on market demands, but this change will not increase production capabilities of any of the polystyrene or polyethylene lines. Ultimately, this change is not expected to impact emissions from the facility.

### b. Adding polyethylene capability to ES-3:

Currently the extrusion lines ES-1 through 4 can only process polystyrene. According to the application, ICC plans to begin processing polyethylene through line ES-3. Like the new blowing agent, the application states that this change is based on market demands. ES-3 will still have the same capacity for production after this change.

Expanding plastic foams always results in emissions of VOC as the blowing agent is released into the atmosphere. When expanding polystyrene, there is the addition of a small amount of styrene emissions (styrene is a HAP and TAP). There are no HAP or TAP emissions associated with polyethylene foam, but the amount of blowing agent emitted is greater.

Using the emission factors for polystyrene and polyethylene expansion in the existing permit (see Specific Condition 2.1 A.1 of the existing permit), the change in potential emissions from switching ES-3 to polyethylene can be estimated. Based on the application, ES-3's maximum process rate is 1,000 pounds expanded per hour, using 180 pounds of blowing agent per hour.

$$\frac{1,000 \text{ lb P.S.}}{\text{hr}} \times \frac{0.0045 \text{ lb VOC}}{\text{lb P.S.}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = \frac{19.71 \text{ ton VOC}}{\text{yr}}$$

*Polystyrene expansion*

$$\frac{180 \text{ lb B.A.}}{\text{hr}} \times \frac{0.6 \text{ lb VOC}}{\text{lb B.A.}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = \frac{473.04 \text{ ton VOC}}{\text{yr}}$$

*Polyethylene expansion*

Based on the emission factors and production rates, the potential increase in VOC emissions from this change is 473.04 – 19.71 = 453.33 tpy. However, ES-3 is included under a 250 tpy VOC emission limit as part of PSD avoidance. Therefore, although ES-3 may appear to have potential VOC emissions greater than the major source thresholds, potential emissions from the facility will not increase. See Section 6.c.i for a discussion of PSD avoidance requirements.

c. New insignificant activities

ICC plans to add new insignificant activities:

- IES-29: thermoplastic bubble film extruder line (5,000 pounds of plastic per day maximum capacity)
- IES-30: plastic grinding station

ICC included calculations in the application demonstrating that each of these new sources qualifies as an insignificant activity under 15A NCAC 02Q .0503(8). These sources will be added to the list of insignificant activities.

d. Summary of changes\*

Page No.	Section	Description of Changes
Throughout	Throughout	<ul style="list-style-type: none"> <li>• Updated dates and permit numbers.</li> <li>• Fixed formatting.</li> <li>• Updated permit format to latest DAQ standard format. Formatting changes are not intended to affect the Permittee's compliance requirements.</li> </ul>
4	1	<ul style="list-style-type: none"> <li>• Split table rows such that each emission source is listed and described individually.</li> <li>• Updated emission source descriptions at Permittee's request.</li> <li>• Made the following changes to the list of emission sources based on the application:                             <ul style="list-style-type: none"> <li>○ Removed ES-7, ES-8, ES-9, and ES-22.</li> <li>○ Noted that isobutane is the blowing agent for all production lines.</li> <li>○ Added polyethylene capability to ES-3.</li> </ul> </li> </ul>

Page No.	Section	Description of Changes
5	2.1 A	<ul style="list-style-type: none"> <li>Grouped sources into this section based on the applicability of 02Q .0317 (PSD Avoidance).</li> <li>Based on the way emission sources were added to this facility, and the way the Permittee is avoiding PSD applicability, the following sources should all be grouped together: ES-1 through ES-5 and ES-20.</li> <li>Reformatted table of emission factors for clarity and to reflect that ES-3 can now process polyethylene.</li> </ul>
5	2.1 A.1	<ul style="list-style-type: none"> <li>Added DAQ's generic emission testing language to this condition. This change is not intended to affect the Permittee's compliance requirements, and is only for conformity with other Title V permits issued by DAQ.</li> </ul>
7	2.1 B	<ul style="list-style-type: none"> <li>Based on the way emission sources were added to this facility, and the way the Permittee is avoiding PSD applicability, this section should only include ES-26.</li> <li>Reformatted table of emission factors to match changes to Section 2.1 A.1.</li> </ul>
7	2.1 B.1	<ul style="list-style-type: none"> <li>Added DAQ's generic emission testing language to this condition. This change is not intended to affect the Permittee's compliance requirements, and is only for conformity with other Title V permits issued by DAQ.</li> </ul>
8	2.2 A	<ul style="list-style-type: none"> <li>Rearranged conditions in this section to match the numerical order in 15A NCAC 02D and 02Q.</li> </ul>
8	2.2 A.3	<ul style="list-style-type: none"> <li>Removed exemption for HAP emitted by the burning of unadulterated fuels. This exemption does not exist in the definition of a major source in 40 CFR 63.2.</li> </ul>
9	2.2 A.4	<ul style="list-style-type: none"> <li>Rewrote this condition to match DAQ's standard language for 02Q .0711.</li> </ul>
10	3 (new)	<ul style="list-style-type: none"> <li>Added this section.</li> <li>Moved the list of insignificant activities (formerly an attachment to the cover letter) to this section.</li> <li>Made the following changes to the insignificant activities based on the application: <ul style="list-style-type: none"> <li>Added IES-29 and IES-30.</li> <li>Removed IES-25.</li> <li>Changed IES-18 to isobutane.</li> </ul> </li> </ul>
11	4	<ul style="list-style-type: none"> <li>Updated General Conditions to v6.0.</li> </ul>

\* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.

## 6. Regulatory Overview and Rules Review:

Under the existing permit, ICC is subject to the following State Implementation Plan (SIP) rules:

- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions" [State enforceable only]
- 15A NCAC 02D .2100 "Risk Management Program"

- 15A NCAC 02Q .0317 “Avoidance Conditions” (PSD Avoidance)
- 15A NCAC 02Q .0317 “Avoidance Conditions” (MACT Avoidance)
- 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit” [State enforceable only]

ICC's requirements under each of these rules are discussed below. In addition, a discussion of several non-applicable rules is also included below.

a. 15A NCAC 02D .1806 “Control and Prohibition of Odorous Emissions” [State enforceable only]

This rule requires that facilities not cause objectionable odors outside of the facility's boundary. In general, DAQ requires facilities that have caused substantiated odor complaints to implement some kind of control for odorous emissions.

There are no documented odor complaints for this facility. The facility has no specific requirements under this rule. Based on the most recent compliance inspection, ICC appeared to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

b. 15A NCAC 02D .2100 “Risk Management Program” (a.k.a. §112(r), Section 112(r) of the Clean Air Act)

This rule applies to facilities that store materials above their respective thresholds in 40 CFR 68.130. Such facilities are required to prepare and submit a Risk Management Plan (RMP). In the application on Form A3, ICC indicates that an RMP is required for the storage of isobutane and propane. Furthermore, the application states that the RMP was most recently updated in June 2019.

In general, a facility must update the RMP at least once per five years (see 40 CFR 68.190(b)(1)). According to the existing permit, the updated RMP was due no later than June 4, 2019. According to the most recent inspection report, the RMP was updated on June 11, 2019. However, the inspection report also states that due date should have been October 21, 2019.<sup>3</sup> Therefore, no compliance action was taken.

The new Title V permit will include a reference to the June 4, 2019 submittal and that a new RMP is due by at least June 4, 2024.

Based on the most recent inspection report, ICC appeared to be in compliance with this requirement. Continued compliance will be determined with subsequent inspections and RMP submittals.

c. 15A NCAC 02Q .0317 “Avoidance Conditions”

This rule allows a facility to avoid the applicability of other rules by accepting an enforceable emission limit, operating limitation, or some other type of restriction. ICC has accepted enforceable emission limits for VOC and HAP to avoid the applicability of 15A NCAC 02D .0530 and 02D .1111, respectively.

i. Avoidance of 15A NCAC 02D .0530 “Prevention of Significant Deterioration” (PSD Avoidance)

In general, for the purposes of PSD, a facility is a “major source” if it has actual emissions of a criteria pollutant greater than 250 tpy and activities at the facility are not included in the list of source categories in 40 CFR 51.166(b)(1)(i). ICC is engaged in plastic foam manufacturing (which

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<sup>3</sup> See DAQ's inspection report dated July 6, 2022 (page 6).

is not listed in 40 CFR 51.166(b)(1)(i) and has previously had actual emissions of VOC greater than 250 tpy. Therefore, ICC is considered a major source for PSD.

*PSD Avoidance limits:* A facility may accept emission limits in order to avoid a facility being classified as a major source or a modification at that facility being classified as a major modification. ICC has previously accepted two separate VOC emission limits in order to avoid the major classification under PSD. The basis of these limits are discussed below:

- (1) ES-1 through ES-5 and ES-20: VOC emissions from these emission sources are limited to less than 250 tpy per 12-month period. This limit was originally included in the permit beginning with the R00 permit revision (issued December 23, 2004). At that time, the limit was facility-wide (i.e., it covered all sources at the facility). By complying with this limit, ICC avoided being classified as a major source for PSD. The 250 tpy limit has not changed, but the emission sources covered by the limit have changed. Since this facility began operation in 2004, several emission sources have been added to, and removed from, the Title V permit.
- (2) ES-26: VOC emissions from this emission source are limited to less than 250 tpy per 12-month period. This limit was originally included in the permit beginning with the T07 permit revision (issued May 12, 2014). By complying with this limit, ICC avoided the T07 permit revision being classified as a major modification.

*Compliance requirements:* In order to demonstrate compliance with the two VOC limits, ICC calculates emissions from the various sources using approved emission factors. The emission factors were most recently reviewed with the T08 and T09 permit revisions (issued February 18, 2018 and March 12, 2019, respectively). The emission factors are listed in the existing permit. The table of emission factors will be updated to reflect that ES-3 can now operate using both polystyrene and polyethylene. However, none of the emission factors will be changed.

Using the approved emission factors, ICC calculates the monthly and rolling 12-month total VOC emissions. ICC submits a semiannual summary report of the VOC emissions.

Based on the most recent inspection report, ICC appears to be in compliance with this requirement. Continued compliance will be determined with subsequent inspections and summary reports.

*Changes to the existing permit:* The extrusion line ES-3 will now process polyethylene. This change is expected to increase VOC emissions. ES-3 will continue to be part of the 250 tpy limit discussed in item (1) above. ICC must continue to demonstrate compliance with each PSD avoidance limit.

In the existing permit, it appears that VOC emissions from ES-2 and ES-20 are combined with ES-26 when complying with PSD avoidance. This change was made with the T08 permit revision (issued February 18, 2018) due to the similarity of emission factors for these sources. However, these sources should not be combined when complying with PSD avoidance. As stated in item (2) above, ES-26 was added under its own, separate PSD avoidance limit. In the new permit, it will be made clear that ES-26 has its own 250 tpy VOC limit.

In addition, the PSD avoidance conditions will be updated to include DAQ's standard emission testing language. No specific testing is required as a result of this change; this change is only for conformity with other Title V permits issued by DAQ.

ii. Avoidance of 15A NCAC 02D .1111 “Maximum Achievable Control Technology” (MACT Avoidance)

In general, a facility is a “major source” of hazardous air pollutants (HAP) if it has potential emissions of any individual HAP greater than 10 tpy or total HAP greater than 25 tpy. If a facility not a major source of HAP, it is an “area source” instead (see 40 CFR 63.2).

This facility has potential emissions of styrene (a HAP) greater than 10 tpy. In order to avoid being designated a major source of HAP, the facility has accepted an enforceable emission limit to reduce potential HAP emissions to less than the major source threshold.

*Compliance requirements:* The primary HAP emitted from this facility is styrene; all other HAPs emitted from this facility are minor by comparison. Styrene is emitted from the polystyrene extrusion processes. In order to determine styrene emissions, ICC uses an emission factor of 2.07E-04 pounds of styrene emitted per pound of polystyrene processed.

ICC calculates the facility-wide monthly and 12-month rolling total styrene emissions. ICC submits a semiannual summary report of the styrene emissions.

Based on the most recent inspection report, ICC appears to be in compliance with this requirement. Continued compliance will be determined with subsequent inspections and summary reports.

*Changes to the existing permit:* The existing permit includes the following exception for HAP calculations and reporting: “Burning of unadulterated fuels shall not be included in the monthly HAP calculations” (see specific condition 2.2 A.1.c of the existing permit). This exception is both improper and irrelevant:

- (1) The definition of a major source in 40 CFR 63.2 does not include any exceptions for HAP emissions from the burning of unadulterated fuel.
- (2) The only fuel burning source at this facility is the propane-fired boiler IES-23. For normal industrial processes, “adulterated” propane is not a concern.

Therefore, this exception will be removed from the permit. This change is not expected to impact the facility’s compliance requirements, given item (2) above.

d. 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit” [state-enforceable only]

This rule limits the emission rates of toxic air pollutants (TAP) from facilities. When making a modification, a facility must demonstrate that the emission rates of all TAPs listed in 02Q .0711 are below their respective TAP permitting emission rates (TPER). TAP emissions from sources listed in 02Q .0702(a)(1)-(27) are not considered when determining compliance with the TPERs. If a facility exceeds a TPER, that facility must demonstrate compliance with the acceptable ambient levels (AAL) in 02D .1104.

In the initial permit application, ICC demonstrated that styrene was the only TAP that would be emitted from non-exempt sources at the facility. Based on an emission factor of 5.00E-4 pounds of styrene emitted per pound of polystyrene processed, ICC showed that the four EPS lines would not cause an exceedance

of the styrene TPER (2.7 pounds of styrene per hour).<sup>4</sup> Since that initial determination, ICC has not made any modifications that increased the emission rate of styrene or any other TAP.

The changes to the emission sources discussed in Section 5 are not expected to increase TAP emission rates. Therefore, no additional TAP emission review is required.

In order to demonstrate compliance with this rule, ICC must maintain records that shows the styrene TPER has not been exceeded. Based on the most recent inspection report, ICC appears to be in compliance with this requirement. Continued compliance will be determined with subsequent inspections.

e. Nonapplicable Rules:

There are several SIP and Federal rules that could potentially apply at this renewal, but ultimately do not.

i. 15A NCAC 02D .0524 “New Source Performance Standards” (NSPS)

This rule incorporates the NSPS rules under 40 CFR Part 60 into North Carolina’s SIP.

There are no NSPS rules that apply to the activities at this facility. Therefore, 15A NCAC 02D .0524 does not apply to this facility.

ii. 15A NCAC 02D .0530 “Prevention of Significant Deterioration” (PSD)

This rule incorporates the PSD rules (40 CFR Parts 51 and 70) into North Carolina’s SIP.

Although this facility is a major source for PSD, none of the emission sources at this facility have undergone a PSD review because ICC has always complied with avoidance limits as allowed by 15A NCAC 02Q .0317 (see Section 6.c.i). Therefore, this rule does not apply to this facility.

iii. 15A NCAC 02D .0614 “Compliance Assurance Monitoring” (CAM)

This rule incorporates the CAM rule under 40 CFR Part 64 into North Carolina’s SIP.

The CAM rules apply to emission sources that used control devices to comply with emission limits. There are no control devices at this facility, so this rule does not apply.

iv. 15A NCAC 02D .1111 “Maximum Achievable Control Technology” (MACT)

This rule incorporates the MACT rules under 40 CFR Part 63 into North Carolina’s SIP. This facility is an area source of HAP because ICC complies with a HAP emission limit (see Section 6.c.ii). Rules that apply only to major sources of HAP (e.g., Subpart DDDDD) do not apply to area sources of HAP.

There are no MACT rules that apply to polyethylene and polystyrene foam extruders located at area sources of HAP.

The area source boiler MACT (40 CFR Part 63, Subpart JJJJJ) does not apply to the propane-fired boiler IES-23 because that rule does not apply “gas-fired boilers” (see 40 CFR 63.11195(e)).

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<sup>4</sup> See DAQ’s application review for the R00 permit revision, issued December 23, 2004 (pages 3 and 4).

Because there are no MACT rules that apply to this facility, this 15A NCAC 02D .1111 does not apply to this facility.

v. 15A NCAC 02D .0900 “Volatile Organic Compounds” and 02D .1400 “Nitrogen Oxides”

These rules apply to sources of VOC and NO<sub>x</sub>. The rules for Reasonably Available Control Technology (RACT) are included in these Sections.

The RACT rules apply geographically according to the lists in 15A NCAC 02D .0902(f) and 02D .1402(d). ICC is located in Catawba County, which is not included in those lists. Therefore, none of the RACT rules apply to this facility.

The rules under 02D .0900 and 02D .1400 that apply statewide are generally based on specific activities (e.g., gasoline terminals or large electric generating utilities). Plastic foam manufacturing is not included in any of these statewide VOC and NO<sub>x</sub> rules.

vi. 15A NCAC 02D .1100 “Control of Toxic Air Pollutants” [state-enforceable only]

This rule limits the emission rate of TAPs from a facility. Facilities subject to this rule must demonstrate compliance with the AALs in 02D .1104 for each TAP emitted at a rate greater than the TPERs in 02Q .0711.

This facility does not emit any TAPs at a rate greater than the TPER in 02Q .0711. Therefore, this facility has no requirements under this rule. See Section 6.d for a discussion of this facility’s requirements under 02Q .0711.

## 7. Compliance Status and Other Regulatory Concerns:

- *Compliance status:* This facility was most recently inspected on July 26, 2021 by Joe Foutz. ICC appeared to be in compliance with the Title V permit during that inspection.
- *Compliance history:* No notices of violation have been issued to this facility since the previous Title V renewal.
- *Application fee:* There is an application fee of \$3,090 for modification of Title V permits. The appropriate fee was received on June 24, 2022.
- *PE Seal:* Pursuant to 15A NCAC 02Q .0112 “Application requiring a Professional Engineering Seal,” a professional engineer’s seal (PE Seal) is required to seal technical portions of air permit applications for new sources and modifications of existing sources as defined in Rule .0103 of this Section that involve:
  - (1) design;
  - (2) determination of applicability and appropriateness; or
  - (3) determination and interpretation of performance; of air pollution capture and control systems.

A PE Seal was not required for this Title V permit renewal or modification. However, the application included a PE Seal anyway.

- *Zoning*: A zoning consistency determination per 15A NCAC 02Q .0304(b) was not required for this Title V permit renewal. Additionally, a zoning consistency determination was not required for the proposed modification because the modification did not request expansion of the existing facility.

## 8. Facility Emissions Review

The table on the first page of this permit review presents the criteria pollutant (plus total HAP) from the latest available approved facility emissions inventory (2021). The HAP emitted in the largest quantity from the facility is generally styrene. However, styrene is only emitted from the polystyrene lines, and ICC did not operate the polystyrene lines in 2020 or 2021.

ICC is classified as a Title V facility due to actual emissions of VOC greater than 100 tpy. This renewal and modification will not affect ICC's status as a Title V facility.

ICC is classified as an area source of HAP (i.e., not a major source) due to a facility-wide HAP emission limit. This renewal and modification will not affect ICC's status as an area source of HAP.

ICC is classified as a major source for PSD due to having had facility-wide VOC emissions greater than the major source threshold (250 tpy). ICC is avoiding triggering a PSD review by complying with two separate PSD avoidance limits. This renewal and modification will not affect ICC's status as a major source for PSD or ICC's ability to avoid triggering additional PSD requirements.

## 9. Draft Permit Review Summary

*Initial internal draft*: An initial draft of the Title V permit and this application review were sent to RCO staff for initial comments on August 9, 2022. The only comments received (by email on August 31, 2022) pointed out formatting errors and typos.

*Second draft*: A second draft of the Title V permit and this application review were sent to MRO staff, SSCB staff, and ICC staff on September 1, 2022. MRO and SSCB stated via email that they had no comments on this draft. ICC submitted comments via email:

- Comments from ICC (received by email on September 12, 2022)

ICC Comment 1: There are typos in the application review and permit.

Response: The indicated issues have been corrected.

ICC Comment 2: The application review incorrectly states that the existing facility uses pentane as the blowing agent and is switching to isobutane. ICC currently uses pentane and isobutane, but is switching to solely isobutane.

Response: The application review will be corrected.

ICC Comment 3: The application incorrectly states that "IES-28: two polyethylene pellet silos" is a new source. IES-28 is an existing source.

Response: The application review will be corrected.

## 10. Public Notice and EPA 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 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 above. South Carolina is an affected state.

- The Public Notice and EPA Review periods began on XXXXX
- The Public Notice period ended on XXXXXX
- The EPA Review period ended on XXXXXX

## 11. Recommendations

This permit application has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Recommend Issuance of Permit No. 09489T10. MRO has received a copy of this permit and submitted comments that were incorporated as described in Section 9.