

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Ashley Industrial Molding, Inc., located at 951 2nd Avenue SE, Oelwein, IA 50662 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Scott Pflughoeft.
2. Ashley Industrial Molding, Inc. is a Plastic Products (SCC 3089) manufacturer. This facility consists of 14 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	5.44
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	25.67
Particulate Matter	PM	51.12
Sulfur Dioxide	SO ₂	0.03
Nitrogen Oxides	NO _x	5.81
Volatile Organic Compounds	VOC	248.32
Carbon Monoxide	CO	4.88
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	59.91

⁽¹⁾ May include the following: Ethylbenzene, xylene, methyl isobutyl ketone (MIK), glycol ethers, styrene, and hexane.

3. Ashley Industrial Molding, Inc. submitted a Title V Operating Permit renewal application on October 25, 2023. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from March 21, 2024 through April 20, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Jason Dowie at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jason Dowie at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Jason Dowie
Iowa Department of Natural Resources - Air Quality Bureau
Wallace State Office Building
502 E 9th St.
Des Moines, Iowa 50319-0034
Phone: (515) 204-3749
E-mail: Jason.Dowie@dnr.iowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Title V Permit Review Notes

Applicant:	Ashley Industrial Molding, Inc.
SIC Code:	3089 (Plastic Products)
City:	Oelwein
County:	Fayette
EIQ#:	92-6974
Facility#:	33-01-003
Permit #:	14-TV-009R2
Reviewer:	Jason Dowie
Date:	2/2/2024

Facility Identification

Facility Name:	Ashley Industrial Molding, Inc.
Facility Location:	951 2 nd Avenue SE, Oelwein, IA 50662
Responsible Official:	Mr. Scott Pflughoeft
Phone:	(260) 587-9155

Background:

Ashley Industrial Molding, Inc. is a Plastic Products plant (SIC 3089). The facility consists of 14 emission points and 11 insignificant units. Ashley Industrial Molding, Inc. formerly had VOC and HAP limits to remain a synthetic minor for Title V. Construction permit project 12-158 relieved those limits and the facility became a major source for Title V.

Regulatory Status:

Ashley Industrial Molding, Inc. is a major source for Title V. See Table 1 for major source by pollutant.

Table 1. Title V Major Source by Pollutant

Pollutant	Major for Title V?
PM ₁₀	<input type="checkbox"/>
SO ₂	<input type="checkbox"/>
NO _x	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
GHG	<input type="checkbox"/>
Individual HAP	<input checked="" type="checkbox"/>
Total HAPs	<input checked="" type="checkbox"/>

HAPs may include ethylbenzene, xylene, methyl isobutyl ketone (MIK), glycol ethers, styrene, and hexane.

Program Applicability:

- PSD: NO
- Part 61 NESHAP: NO
- NSPS: NO
- Part 63 NESHAP: YES
 - The paint booths, paint kitchen, dry off and cure ovens, and flash tunnel (emission points EP-1 through EP-6, EP-8, FE-9, and EP-10) are subject to NESHAP Subpart PPPP as new general use sources.
 - The compression molding press units (emission points FE-1 through FE-3) are subject to NESHAP Subpart WWW.
 - Boiler #1 and Boiler #2 (emission point EP-7) are subject to NESHAP Subpart DDDDD.
- Acid Rain: NO
- Stratospheric Ozone Protection: YES
- Prevention of Accidental Releases: NO
- CAM: NO

Construction Permits:

The description of significant emission units are listed in Table 2.

Table 2. List of Emission Unit Description and Construction Permit of Each Unit

Emission Point Number	Emission Unit Number	Emission Unit Description	DNR Construction Permit Number
EP-1 EP-2	EU-1	Paint Booth	09-A-429-S2
	EU-1	Paint Booth	09-A-430-S2
	EU-PFT	Prime Flash Tunnel	Exempt 567 IAC 22.1(2)"y"
EP-3 EP-4 EP-5 EP-6	EU-2	Paint Booth	09-A-431-S2
	EU-2	Paint Booth	09-A-432-S2
	EU-2	Paint Booth	09-A-433-S2
	EU-2	Paint Booth	09-A-434-S2
	EU-TFT	Topcoat Flash Tunnel	Exempt 567 IAC 22.1(2)"y"
FE-1	EU-3	Compression Molding Press	09-A-435-S2
FE-2	EU-4	Compression Molding Press	
FE-3	EU-5	Compression Molding Press	
FE-4	EU-6	Facility Solvent Usage Fugitive Emissions	Fugitive
EP-7	EU-7, EU-8	Boiler #1 and Boiler #2 (3.969 MMBtu/hr each, Natural Gas)	Exempt 567 IAC 22.1(2)"a"
EP-8	EU-DRYOFF	Dry Off Oven (2.0 MMBtu/hr, Natural Gas)	Exempt 567 IAC 22.1(2)"y"
FE-9	EU-PK	Paint Kitchen (Internally Vented)	Exempt 567 IAC 22.1(2)"i"
EP-10	EU-CURE	Cure Oven (4.0 MMBtu/hr, Natural Gas)	Exempt 567 IAC 22.1(2)"y"

Potential Emissions:

Potential emissions are listed in Table 3.

Table 3. Potential Emission for Ashley Industrial Molding, Inc.

Pollutant	Potential Emissions (TPY)
PM _{2.5}	5.44
PM ₁₀	25.67
PM	51.16
SO ₂	0.03
NO _x	5.81
VOC	248.32
CO	4.88
Lead	0
HAP	92.39

Compliance Status:

The facility is in compliance.

Periodic Monitoring/CAM:

Periodic monitoring requirements were evaluated based on Department's Periodic Monitoring Guidance (PMG). Stack testing is not required for this renewal. Facility uncontrolled emissions are below the major threshold for emission points with control equipment, therefore CAM is not required for this renewal.

Specific Changes in this Renewal:

- The permit number was updated from 14-TV-009R1 to 14-TV-009R2 (pp. 1, 4, 6, 9 and the footer).
- Emission point EP-11 was removed from the Equipment List. The associated emission unit EU-CBST was added to the Insignificant Equipment List based on the amount of emissions and no other applicable requirements making it significant.
- PTE calculations were verified to be reasonable and in order.
- General Conditions were updated to the most recent version.