

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) 24.107(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. Industrial Laminates/Norplex, LLC., located at 665 Lybrand Street, Postville, Iowa has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Scott Hagen.
2. Industrial Laminates/Norplex, LLC is a manufacturer of laminate products. This facility consists of 78 emission points and over 90 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 2.5 \mu\text{m}$)	PM _{2.5}	298.45
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	298.45
Particulate Matter	PM	298.45
Sulfur Dioxide	SO ₂	17.20
Nitrogen Oxides	NO _x	130.78
Volatile Organic Compounds	VOC	1106.99
Carbon Monoxide	CO	49.88
Lead	Lead	0.00
Hazardous Air Pollutants ⁽¹⁾	HAP	1022.41

⁽¹⁾ May include the following: Benzene, Dichloromethane, Formaldehyde, Hexane, Toluene, Dimethylformamide, Methanol, Xylenes, and Phenol.

3. Industrial Laminates/Norplex, LLC submitted a Title V Operating Permit renewal application on April 8, 2024. 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 24.107.
4. DNR has complied with the procedures set forth in 567 IAC 24.107, 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 20, 2025 through April 19, 2025. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Taylor Dailey 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 Taylor Dailey 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.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 21-33, 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 21-33.
4. DNR is required to comply with 567 IAC Chapter 24 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 Renewal Permit Writer Notes

Reviewer: Taylor Dailey

Applicant: Industrial Laminates/Norplex, LLC.

EIQ#: 92-3842

Facility Number: 03-02-001

Facility Description: Laminate Products Manufacturing (SIC 3083)

Industrial Laminates/Norplex, LLC manufactures laminate products. The laminates are produced by coating a substrate(s) (e.g., paper, cotton fabric, glass fabric, synthetic fabric) with various coatings (e.g., phenolic resin, melamine resin, epoxy resin, etc.).

The facility manufactures the laminate by the following processes:

1. Various grades of epoxy and phenolic resins are prepared.
2. The resins are applied to a substrate.
3. The coated substrates are hydraulically pressed into laminates of various thicknesses.
4. Some of the laminate products are wrapped around a mandrel to form tubing.
5. The laminate products are cut, packaged, and stored for shipment.

The renewal (R3) Title V application was received September 5, 2019. The facility currently has 80 significant emission points and over 90 significant emission units, excluding portable and fixed mixing tanks (see Appendix A, Title V permit).

The facility uses acetone, a non-HAP for cleaning. Insignificant activities include make-up heaters, storage tanks, two propane storage tanks, a hydraulic oil tank, a solvent recovery batch still, and a maintenance parts washer. In the last permit, two propane vaporizers (EP-951 & 952) were removed from the insignificant list and added to the significant list, because they are subject to NESHAP 40 CFR Part 63 Subpart DDDDD [the facility has a potential to emit HAPS above 25 TPY (17.8- thousand tons reported in their Form 1.4)]. In addition, the boiler, EP-950-001 is subject to NESHAP 40 CFR Part 63 Subpart DDDDD.

Construction Permits Changes

All emission limits and operational limits and requirements from this facility's construction permits were included in the Title V permit. New or modified construction permits include the following: 97-601-S7 and 04-A-689-S4.

Operational Changes

Rod Milling Machine was moved from EP-404001 to EP-596-001, and each of their respective construction permits, 97-601-S7 and 04-A-689-S4, were updated as stated above.

Applicable Requirements

The facility is subject to the following NESHAPs:

- 40 CFR, Part 63 Subpart A – General Provisions
- 40 CFR, Part 63 Subpart OOOO, “National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles” (567 IAC 23.1(4)"co").
- Subpart DDDDD – The Boiler (950-001) and propane vaporizers (951-001 & 952-001) are of the source type regulated by the National Emission Standard for Hazardous Air

Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (567 IAC 23.1(4)"dd", 40 CFR Part 63, Subpart DDDDD).

The facility is subject to the following NSPSs:

- 40 CFR 60 Subpart A – NSPS General Provisions.
- 40 CFR 60 Subpart VVV - Standards of Performance for Polymeric Coating of Supporting Substrates Facilities. The applicable Subpart VVV requirements are included as Emission Point-Specific Conditions (567 IAC 23.1(2)"bv").

Emission Points and Units

EU 101 through EU 122 – Storage Tanks; fixed and portable. Note: 40 CFR, Part 63 Subpart OOOO includes all containers used for storage, mixing, and conveying of coatings as affected facilities.

1. 119-001, 120-001 and 999-008—portable and fixed mixing tanks used in the preparation of polymeric coatings, which are subject to 40 CFR Part 60, Subpart VVV, “Standards of Performance for Polymeric Coating of Supporting Substrates Facilities.” The coating mix preparation equipment are subject to the requirements of 40 CFR, Part 63, Subpart OOOO, “National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles”.

2. Treater 201 with Thermal Oxidizer (TO281):

Installed in 1987 with construction initiated in 1986, prior to the applicability date of NSPS Subpart VVV. CAM is required.

The Treaters are subject to the requirements of 40 CFR, Part 63, Subpart OOOO, “National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles”. Compliance with the requirements of this regulation was required by May 30, 2006. Note the fugitive cleaning (EP 201-003) is also an affected source covered by the Fabric MACT.

3. Treater 202, 203, 204, 206, 207, & 208 are subject to 40 CFR 63 Subpart OOOO – Fabric NESHAP.

4. Treater 208 & Treater 207, Zone 1 & 2 with Thermal Oxidizer (TO280), are subject to NSPS Subpart VVV and NESHAP Subpart OOOO. These emission units qualify for CAM. Treater could qualify for Periodic Monitoring and stack test for VOCs, but the DNR waived requirements, because the VOCs are VHAPs covered by the MACT.

5. EU 210-001: The clean-up solvent equipment is subject to the requirements of 40 CFR, Part 63, Subpart OOOO.

6. Laminate Presses 301 through 310: The presses are subject to the requirements of 40 CFR, Part 63, Subpart OOOO.

7. EP 404-001: Dust Collector for EUs 407, 588 & 601B. Qualifies for CAM.

8. Post-Bake Oven Nos. 496, 495, 497, 498, & 499 are used to cure/harden laminate to customer specs. The ovens are subject to the requirements of 40 CFR, Part 63, Subpart OOOO. This process is a secondary curing step.

9. Mandrel Oven Nos. 530, 531, 532, 533, 534, 535 and 538: The tubing mandrel ovens are subject to the requirements of 40 CFR, Part 63, Subpart OOOO.
10. EP 536 & 550: Rolled Tube Heat Treat Oven. The heat treat ovens are subject to the requirements of 40 CFR, Part 63, Subpart OOOO.
11. EP 674-001: The band saw has no requirements.
12. EP 596-001: Dust Collector, CE 596 qualifies for Facility O&M and is subject to the requirements of 40 CFR, Part 63, Subpart OOOO.
13. EP 597-001: Dust Collector, DC 597. Norplex provided site-specific pre-control emissions estimates indicating unit < CAM.
14. EP 598-001: Dust Collector, DC 598. This unit does not qualify for CAM.
15. Boiler 950: Subject to 40 CFR, Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".
16. Boiler 951: Subject to 40 CFR, Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".
17. Boiler 952: Subject to 40 CFR, Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters".
18. EP 967-001, 10 HP Chopper: Internally vented dust collector and does not qualify for Periodic Monitoring or CAM.
19. EP 969-001: Dust Collector for EUs 402, 403, and 420. Qualifies for CAM.
20. EP 999-020: Solvent Recovery from Batch Still is subject to the requirements of 40 CFR, Part 63, Subpart OOOO.
21. EU 999-030: Sub-Slab Depressurization System: No requirements.
22. EP 999-501: EUs 503, 506, 508, 511, 512, 562, 563, 564, 568, and 569. Tube Rollers and Wet Grinders. No control equipment. This facility is subject to 40 CFR Part 63 Subpart OOOO, but these units are not affected sources as defined in this rule at § 63.4282.
23. EP 999-502: EUs 512, 513, 515, 518, 519, and 520. Tube Rollers. No control equipment.

Periodic Monitoring

Periodic Monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document. Facility operation and maintenance plans and CAM plans are required for some emission points.