



**STATEMENT OF BASIS**  
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 BAQ Engineering Services Division

<b>Company Name:</b>	Fehrer Automotive North America LLC	<b>Permit Writer:</b>	Susan Peterson
<b>Permit Number:</b>	2060-0514.0tv	<b>Date:</b>	DATE

**DATE APPLICATION RECEIVED:** March 15, 2017  
 Site Visit: July 26, 2017

**FACILITY DESCRIPTION:** Fehrer Automotive North America LLC manufactures molded polyurethane foam parts for the automotive and upholstery industries.

**PROJECT DESCRIPTION:** Issue an initial TV operating permit.

**SOURCE TEST REQUIREMENTS:** None required.

**SPECIAL CONDITIONS, MONITORING, LIMITS:** Fehrer operates Foam Lines that are subject to 40 CFR 63 Subpart OOOOOO Flexible Polyurethane Foam Production and Fabrication.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled/Limited Emissions
	TPY	TPY
VOC	129.648	N/A
HAP (MDI)	7.82E-04	N/A
PM	21.106	1.055

**OPERATING PERMIT STATUS:** The facility currently operates under Conditional Major Operating Permit 2060-0514.0cm that was issued on December 4, 2014 (effective January 1, 2015). It contains a VOC federally enforceable < 100 tpy VOC limit.

DHEC issued construction permit 2060-0514-CC on March 21, 2016 that lifted the < 100 tpy VOC federally enforceable < 100 tpy VOC limit imposed by 2060-0514.0cm.

Fehrer submitted a timely TV Operating Permit application in accordance with Condition C.6 of construction permit 2060-0514-CC.

**REGULATORY APPLICABILITY REVIEW**

Regulation	Comments/Periodic Monitoring Requirements
Section II.E - Synthetic Minor	Not Applicable. Construction permit 2060-0514-CC lifted the federally enforceable < 100 tpy VOC limit.
Standard No. 1	Not Applicable. The facility has no fuel burning operations as defined in SC Regulation 61-62.1.
Standard No. 3 (state only)	Not Applicable The facility is not combusting waste.
Standard No. 4	Applicable



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Regulation	Comments/Periodic Monitoring Requirements																																	
	<p>Fehrer operates sources that are subject to PM and Opacity limits under this standard.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Unit ID</th> <th style="text-align: center;">Process</th> <th style="text-align: center;">Process Weight Rate (ton/hr)</th> </tr> </thead> <tbody> <tr><td align="center">01</td><td align="center">SC-A Foam Production Line</td><td align="center">0.924</td></tr> <tr><td align="center">01</td><td align="center">SC-A Foam Production Line: Release Agent</td><td align="center">0.924</td></tr> <tr><td align="center">01</td><td align="center">SC-A Crushing Process</td><td align="center">0.924</td></tr> <tr><td align="center">02</td><td align="center">SC-Foam Finishing, Unit 2</td><td align="center">0.924</td></tr> <tr><td align="center">03</td><td align="center">SC-B Foam Production Line</td><td align="center">0.347</td></tr> <tr><td align="center">03</td><td align="center">SC-B Cleaning Booth</td><td align="center">0.347</td></tr> <tr><td align="center">03</td><td align="center">SC-B Crushing Process: SC-B and SC-C Lines</td><td align="center">0.347</td></tr> <tr><td align="center">04</td><td align="center">SC-Foam Finishing, Unit 1</td><td align="center">0.924</td></tr> <tr><td align="center">05</td><td align="center">SC-C Foam Production Line</td><td align="center">0.193</td></tr> <tr><td align="center">06</td><td align="center">SC-D Foam Production Line</td><td align="center">0.042</td></tr> </tbody> </table> <p>Fehrer conducts weekly inspections of the dry filters to ensure compliance with this Standard.</p> <p>Fehrer will conduct a semi-annual visual inspection as required by Title V regulations.</p>	Unit ID	Process	Process Weight Rate (ton/hr)	01	SC-A Foam Production Line	0.924	01	SC-A Foam Production Line: Release Agent	0.924	01	SC-A Crushing Process	0.924	02	SC-Foam Finishing, Unit 2	0.924	03	SC-B Foam Production Line	0.347	03	SC-B Cleaning Booth	0.347	03	SC-B Crushing Process: SC-B and SC-C Lines	0.347	04	SC-Foam Finishing, Unit 1	0.924	05	SC-C Foam Production Line	0.193	06	SC-D Foam Production Line	0.042
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Standard No. 5	<p>Not Applicable</p> <p>This standard applies only to processes that were in existence on either July 1, 1979 or July 1, 1980 depending on the process and only to plants having the plant-wide potential to emit more than 150 lb/hr or 550 lb/day of VOC (about 100 tpy). Fehrer was not in existence in 1980.</p>																																	
Standard No. 5.2	<p>Not Applicable</p> <p>The facility operates combustion sources (natural gas space heaters) but these sources are less than 10 million BTU/hr therefore the sources are exempt from this regulation.</p>																																	
Standard No. 7	<p>Not Applicable</p> <p>This regulation applies to "major plants" undergoing modifications that will cause a "significant increase" of regulated air pollutant emissions. With the addition of the 2 foam lines, Fehrer will have the potential to emit VOC at &gt; 100 tpy. However, Fehrer is not one of the 28 source categories defined in the PSD Regulations that have a threshold of 100 tpy; the threshold for VOC emissions is 250 tpy for the facility and facility-wide potential VOC emissions are &lt; 250 tpy. This regulation does not apply.</p>																																	
61-62.6	<p>Not Applicable</p> <p>This process does not have fugitive PM emissions.</p>																																	
40 CFR 60 and 61-62.60	<p>Not Applicable</p> <p>This process does not contain sources subject to this standard.</p>																																	



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Regulation	Comments/Periodic Monitoring Requirements
40 CFR 61 and 61-62.61	Not Applicable This process/operation does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclei, radon, or vinyl chloride).
40 CFR 63 and 61-62.63	Not Applicable The facility does not have to the potential to emit HAPs at major source thresholds.
40 CFR 63 Area Sources	Applicable. This facility is subject to Subpart OOOOOO – Flexible Polyurethane Foam Production and Fabrication Area Sources since it (a)(1) owns or operates a plant that produces flexible polyurethane foam or rebond foam as defined in §63.1292 of Subpart III, (a)(2) owns or operates a flexible polyurethane foam fabrication facility, as defined in §63.11419.
61-62.68	Not Applicable The facility does not store or use any chemicals subject to 112(r) above the threshold quantities.
40 CFR 64	Not Applicable CAM monitoring is specific to large emissions units at title V facilities that use add-on control devices to achieve compliance with emissions limits. Fehrer is not subject to a VOC emission limit that requires add-on control devices.

**MODELING REVIEW**

Regulation	Comments/Periodic Monitoring Requirements
Standard No. 2	Not Applicable The facility is exempt from the requirement to submit a modeling analysis because the controlled or uncontrolled PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , NO <sub>2</sub> , and CO emissions are less than 1.0 lb/hr. See modeling summary dated August 10, 2017.
Standard No. 8 (state only)	Applicable. The Foam Lines emit Methylene Biphenyl Diisocyanate (HAP) and MEK (TAP) emissions at di minimus levels. See modeling summary dated August 10, 2017.

**PUBLIC NOTICE**

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II.N. The comment period was open from October 6, 2017 to Novemer 4, 2017 and was placed on the BAQ website during that time period.

**SUMMARY AND CONCLUSIONS**

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.