

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2008**

Region: Fayetteville Regional Office
County: Hoke
NC Facility ID: 4700001
Inspector's Name: Robert Kennedy
Date of Last Inspection: 07/27/2007
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Burlington Industries LLC - Raeford Plant Facility Address: Burlington Industries LLC - Raeford Plant 1001 Turnpike Road Raeford, NC 28376 SIC: 2231 / Weaving & Finishing Mills Wool NAICS: 313312 / Textile and Fabric Finishing (except Broadwoven Fabric) Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4700001.07B and 4700001.08A Date Received: 08/27/2007 and 01/15/08 Application Type: Renewal and TV Sign Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 00242/T13 Existing Permit Issue Date: 03/08/2007 Existing Permit Expiration Date: 06/30/2008
Peter Borton Plant Engineer (910) 875-3731 1001 Turnpike Rd Raeford NC, 28376	Calvin House Plant Manager (910) 875-3731 1001 Turnpike Rd Raeford NC, 28376	Mike Garlick Corporate Environmental Engineer (336) 379-2941 804 Green Valley Road Greensboro NC, 27408	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2008		Comments / Recommendations: Issue 00242/T14 Permit Issue Date: date, 2008 Permit Expiration Date: date, 2013	

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 (**00242T13**) was issued on **March 8, 2007**, and is currently scheduled to expire on **June 30, 2008**. The renewal application was received on **August 27, 2007**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

Permit application **4700001.08A** has also been consolidated into the renewal application. ITG recently transferred certain wool and polywool dyeing and finishing operations to the Raeford Plant. Application for these process modifications was submitted in December 2006 and Permit No. **00242T13** was issued as a result. That permit required that the Permittee submit a complete title V application within 12 months of startup of recently approved equipment. This new application completes that requirement and was deemed complete for processing.

In addition to this submittal, the Permittee is requesting the modification of backup boilers (**ID Nos. ESB4 and ESB5**) to permit burning of No. 2 fuel oil and No. 4 (equivalent recycled) fuel oil. These boilers are currently permitted to combust natural gas, No. 5 fuel oil, and No. 6 fuel oil. The addition of No. 2 fuel oil poses no issues as the facility is already permitted to combust No. 5 and No. 6 fuel oil (No. 2 being inherently cleaner burning). The addition of No. 4 (equivalent recycled) fuel oil will require that the Permittee be subject to a State-enforceable only Toxics Avoidance Condition. This new condition will require that the Permittee certify that the recycled fuel is equivalent to the unadulterated fossil fuel by meeting specific criteria (see Section VII of this Document for a discussion).

II. Facility Description

Burlington Industries -Raeford facility is a wool and polywool textile manufacturer with dyeing and blending operations. The Raeford plant receives bales of wool, polyester, and cotton from other facilities. The material is dyed various colors and then processed through multiple blending operations where the wool fibers are aligned into parallel strands, wound, heated and compressed into a smaller thread. After many blending operations, the wool, polyester, or cotton is passed through a heated chamber to “set” or relax the material, i.e., prevent curling and unwinding. The boilers provide the heat for this process. Burlington Industries has the capability to burn natural gas, No. 5 fuel oil, No. 6 fuel oil, and bituminous coal; however, the facility chooses to burn mostly coal since it is the most economical.

III. History/Background/Application Chronology

December 19, 2006 – Notice of Intent to Construct approved for the installation of wool and polywool finishing equipment.

March 8, 2007 – Permit **00242T13** issued for the operation of the wool and polywool finishing equipment.

August 27, 2007 – Permit application **4700001.07B** was received for the renewal of the current Title V air permit. Application was deemed complete for processing.

November 6, 2007 – Received Air Permit Regional P&O from Robert Kennedy of FRO. See Section IX of this Document for a discussion.

January 15, 2008 – Permit application **4700001.08A** was received as required by Part II, Section 2.2 for the completion of the two-step TV Significant modification process. Application was deemed complete for processing and was consolidated into this renewal application.

February 12, 2008 – Received CAM applicability calculations in support of the renewal application.

February 25, 2008 – DRAFT permit sent to Permittee, Fayetteville Regional Office, and Title V Coordinator for comment prior to public notice and EPA review.

Date, 2008 – DRAFT permit sent to public notice and EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Page	Section	Description
Attachment	Insignificant activities	-updated permit revision number -added sources per Permittee request
Cover	-	-amended all permit revision numbers and all dates
TOC	-	-removed reference to Part II
All	Header	-amended permit revision number
3	Equipment Table	-clarified equipment descriptions -removed asterisks and language referencing Part II -added new fuel types to backup boilers
4	2.1 A 2.1 A.1.a	-clarified equipment description -updated shell language
5	2.1 A.1.b 2.1 A.1.c 2.1 A.1.f	-updated shell language -added ID Nos. -corrected paragraph order and added ID Nos.
6	2.1 A.2.c 2.1 A.2.d	-added ID Nos. -added ID Nos. and updated shell language
7	2.1 B (table) 2.1 B.1.a 2.1 B.1.c 2.1 B.1.d 2.1 B.1.e	-corrected cross reference and rule citation -updated shell language -added testing requirement -corrected paragraph order and added ID Nos. -corrected paragraph order
8	2.1 B.1.f 2.1 B.1.g 2.1 B.2.a 2.1 B.2.c	-corrected paragraph order and added ID Nos. -corrected paragraph order -updated shell language -added ID Nos.
9	2.1 B.2.e 2.1 B.3.a 2.1 B.3.c	-updated shell language -updated shell language -updated shell language
10	2.1 C 2.1 C (table) 2.1 C.1.a 2.1 C.1.b 2.1 C.1.c 2.1 C.2.a	-added fuel types to equipment description -added reference to Toxics Avoidance Condition -added fuel types -updated shell language -added fuel types -updated shell language
11	2.1 C.2.c 2.1 C.2.d 2.1 C.2.e 2.1 C.3.a 2.1 C.3.c	-added fuel types and ID Nos. -added fuel types and ID Nos. -added fuel types -updated shell language -added fuel types and ID Nos.
11-12	2.1 C.3.d	-added fuel types and ID Nos.
12-13	2.1 C.4	-added Toxics Avoidance Condition for recycled oil combustion
13	2.1 D (table)	-corrected rule citation
14	2.1 E 2.1 E (table) 2.1 E.1.a	-clarified equipment description -corrected rule citation -updated shell language

Page	Section	Description
15	2.1 E.1.c 2.1 E.1.d 2.1 E.2.a 2.1 E.2.c 2.1 E.3.a	-updated shell language -added “no reporting” language -updated shell language -updated shell language and added ID Nos. -updated shell language
15-16	2.1 E.3.c	-updated shell language and added ID Nos.
16	2.1 E.3.f	-updated shell language
17	2.1 F 2.1 F (table) 2.1 F.1.a 2.1 F.1.b 2.1 F.1.c 2.1 F.1.d	-clarified equipment description -corrected rule citation -updated shell language and added ID Nos. -updated shell language -updated shell language -added “no reporting” language
18	2.1 F.2.a 2.1 F.2.c 2.1 F.3.a 2.1 F.3.c	-updated shell language -updated shell language and added ID Nos. -updated shell language -updated shell language and added ID Nos.
19	2.2 A 2.2 A (table)	-clarified equipment description -clarified applicable standard/limit
20	2.2 B (table)	-corrected rule citation -added reference to 2D .0540
21	2.2 B.1.d	-updated shell language
22	2.2 B.2.b	-updated shell language
23	2.2 B.5	-added 2D .0540 permit condition
24	General Conditions	-added shell version number (v2.19)
-	Part II	-removed Part II

It should be noted that each emission source and control device description were updated according to current ESM practices. There were no major addition, deletions, or modifications.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1100, Control of Air Toxics
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration and 15A NCAC 2D .1111, Maximum Achievable Control Technology)
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

The following regulations have been added as part of this permit renewal:

15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2Q .0700, Toxic Air Pollutant Procedures)

A regulatory review for the existing requirements will not be included in this document. However, the following list provides a discussion for some of the current permit conditions:

1. The current permit does not require inspection and maintenance for the bagfilter (**ID No. CDSH1**) controlling shearer (**ID No. ESSH1**) because the uncontrolled emissions are below the 2.79 pounds per hour allowable limit per 15A NCAC 2D .0515. *It should be noted that the renewed permit has been modified to include I&M requirements for this control device by request by the FRO (see comments below);*
2. The current permit does not contain any operational, inspection or maintenance requirements for the cyclone (**ID No. CDSN1**) and spray chamber (**ID No. CDSN2**) controlling the singer (**ID No. ESSN1**) because uncontrolled emissions are below the 10.5 pounds per hour allowable limit per 15A NCAC 2D .0515. *The renewed permit does not change this status;*
3. The current permit does not contain any operational, inspection or maintenance requirements for the thermal oxidizers (**ID Nos. CDOX1 and CDOX2**) controlling the tenter frames (**ID Nos. ESTF1 and ESTF2**) because uncontrolled emissions are below the 5.28 pounds per hour allowable limit per 15A NCAC 2D .0515. *The renewed permit does not change this status.*

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is currently required to limit hazardous air pollutants emissions to less than the major source thresholds (i.e., less than 10/25 tons per year) in order to avoid the applicability of MACT; specifically, Subpart OOOO, National Emission Standards for Hazardous Air Pollutants from Printing, Coating, and Dyeing of Fabrics and Other Textiles. To ensure compliance with this requirement, the Permittee is required to maintain records of all fuel combusted in all combustion sources at the facility and submit semi-annual reports of the required records. This permit renewal does not affect this status.

It should also be noted that the current permit also lists the MACT for combustion sources (Subpart DDDDD). This MACT has been vacated so its reference in the renewed permit has been removed.

PSD – The facility is currently required to limit sulfur dioxide emissions to less than 250 tons per year from the fuel combustion sources at the facility in order to avoid the applicability of PSD. To ensure compliance with this requirement, the Permittee is required to maintain records of the types and amounts of all fuel combusted and calculate monthly sulfur dioxide emissions. In addition, the Permittee is required to submit semi-annual reports of the required records. This permit renewal does not affect this status.

112(r) – The 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. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance 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. The following equipment/control device relationships exist:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ESS1	One starch storage silo	CDBS1	One polyester felt fabric filter (260 square feet of filter area)
ESS2	One polyvinyl alcohol storage silo	CDBS2	One polyester felt fabric filter (170 square feet of filter area)
ESB1	One coal-fired boiler (44 million Btu per hour maximum heat input capacity)	CDMC1B1 CDMC2B1	Two multicyclones (25 nine-inch diameter tubes each)
ESTF1 ESTF2	Two natural gas/propane-fired tenter frames (9 million Btu per hour maximum heat input capacity each)	CDOX1 CDOX2	Two natural gas/propane-fired thermal oxidizers (14 million Btu per hour maximum heat input capacity each)
ESSH1 ESSH2	Two shearers	CDSH1 CDSH2	Two bagfilters (590 and 393 square feet of filter area, respectively)
ESSN1	One natural gas/propane-fired singer (0.9 million Btu per hour maximum heat input capacity)	CDSN1 CDSN2	One cyclone (31.5 inches in diameter) On spray chamber (4.84 gallons per hour minimum liquid injection rate)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)	Control Equipment Installed to Meet Permit Limit?
ESS1	CDBS1	15A NCAC 2D .0515 15A NCAC 2D .0521	Yes Yes
ESS2	CDBS2	15A NCAC 2D .0515 15A NCAC 2D .0521	Yes Yes
ESB1	CDMC1B1 CDMC2B1	15A NCAC 2D .0503 15A NCAC 2D .0516 15A NCAC 2D .0521 15A NCAC 2Q .0317 (PSD) 15A NCAC 2Q .0317 (MACT)	Yes No Yes No (PSD limit is for SO ₂) No (HAP limit based on fuel firing)
ESTF1 ESTF2	CDOX1 CDOX2	15A NCAC 2D .0515 15A NCAC 2D .0516 15A NCAC 2D .0521 15A NCAC 2Q .0317 (PSD) 15A NCAC 2D .0958 15A NCAC 2Q .0317 (MACT) 15A NCAC 2D .1100 15A NCAC 2Q .0711	Yes No Yes No (PSD limit is for SO ₂) No (VOC work practice standard) No (HAP limit based on fuel firing) No No
ESSH1 ESSH2	CDSH1 CDSH2	15A NCAC 2D .0515 15A NCAC 2D .0521	Yes Yes

Emission Source ID No(s).	Control Device ID No(s).	Permit Condition(s)	Control Equipment Installed to Meet Permit Limit?
ESSN1	CDSN1 CDSN2	15A NCAC 2D .0515 15A NCAC 2D .0516 15A NCAC 2D .0521 15A NCAC 2Q .0317 (PSD)	Yes No Yes No (PSD limit is for SO ₂)

As shown above, for each case the pollutant of concern is particulate matter. For CAM applicability, potential pre-controlled PM₁₀ emissions must be greater than 100 tons per year. The Permittee estimates the emissions as follows:

Emission Source ID No(s).	Control Device ID No(s).	Potential Pre-controlled PM ₁₀ emissions (tpy)	CAM Applicable?
ESS1	CDBS1	<8	No
ESS2	CDBS2	<8	No
ESB1	CDMC1B1 and CDMC2B1	94.92	No
ESTF1 and ESTF2	CDOX1 and CDOX2	8.86	No
ESSH1 and ESSH2	CDSH1 and CDSH2	21.54	No
ESSN1	CDSN1 and CDSN2	1.11	No

Assumptions:

-Sources (**ID Nos. ESS1 and ESS2**) have not been in use recently. Potential after controls of 0.08 tons per year was submitted as part of a previous permit application and was the potential to emit with the silo bagfilter in place. The Permittee assumed 99% efficiency for the bagfilter to estimate the potential pre-controlled emissions from these sources. This assumed efficiency is very conservative for back calculations for a bin vent.

-Potential emissions from the boiler (**ID No. ESB1**) are estimated using DAQ coal combustion spread sheet.

-Each tenter frames (**ID Nos. ESTF1 and ESTF2**) has a maximum heat input of 9.0 million Btu per hour. Combustion emissions were calculated using the DAQ combustion emission spreadsheet.

-Potential emissions from the two shearers (**ID Nos. ESSH1 and ESSH2**) assumed 25 yards per minute process rate, 2 shearers, 80% run efficiency, and 2.049 pounds PM₁₀ per 1000 yards emission rate:

$$25\text{yd}/\text{min} \times 2.049\text{lb}/1000 \text{ yd} \times 60 \text{ min}/\text{hr} \times 8760 \text{ hrs}/\text{yr} \times 0.8 \times 2 = 43078 \text{ lbs}/\text{yr} (21.54 \text{ tons}/\text{yr})$$

-Uncontrolled emissions from the singer (**ID No. ESSN1**) are based on emission rates included in the Clarksville, Virginia air permit application where the singer was originally located. PM₁₀ emissions are a combination of back-calculated emissions from both the cyclone and scrubber both with an estimated 95% efficiency and associated emission rates of 2.76 and 3.48 pounds per hour respectively and the products of combustion calculated from the DAQ combustion spreadsheet.

VII. Facility Wide Air Toxics

The facility is subject to both modeled emissions rates per 15A NCAC 2D .1100 and toxic emission permitting rates per 15A NCAC 2Q .0711. The modeled rates were added to the permit during the latest modification and require the Permittee to limit formaldehyde and acetic acid emissions from the tenter frames (**ID Nos. ESTF1 and ESTF2**) to less than 3.672 and 81.84 pounds per hour respectively. In addition, acetic acid emissions are also limited for two insignificant activities (**ID Nos. I-500 and I-600**) to less than 1.72 and 0.123 pounds per hour respectively. To ensure compliance with these limits the permit stipulates minimum stack heights for the emission sources.

According to the latest inspection report, the facility is in compliance with the stack height requirements.

The TPER limits for trichloroethylene and xylene are listed in the permit as being previously evaluated. The Permittee is required to complete a modeling demonstration prior to the TPERs being exceeded.

This permit renewal does not affect the status of these permit requirements.

As a result of the Permittee’s request to combust No. 2 and/or No. 4 (equivalent recycled) fuel oil in its backup boilers, the following permit language has been added as a State-enforceable only requirement:

State-enforceable only

**4. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS
for 15A NCAC 2Q .0700: TOXIC AIR POLLUTANT PROCEDURES**

- a. *Vendor supplied recycled No. 2 (equivalent recycled) fuel oil and No. 4 (equivalent recycled) fuel oil requirements – In accordance with 15A NCAC 2Q .0317, the Permittee is avoiding the applicability of 15A NCAC 2Q .0700, Toxic Air Pollutant Procedures, by using recycled fuels which are equivalent to their virgin counterparts. The Permittee is allowed to use the recycled fuel oils supplied by a DAQ-approved vendor as follows:*

<i>Constituent/Property</i>	<i>Allowable Level</i>
<i>Arsenic</i>	<i>1.0 ppm maximum</i>
<i>Cadmium</i>	<i>2.0 ppm maximum</i>
<i>Chromium</i>	<i>5.0 ppm maximum</i>
<i>Lead</i>	<i>100 ppm maximum</i>
<i>Total Halogens</i>	<i>1000 ppm maximum</i>
<i>Flash Point</i>	
<i>No. 2</i>	<i>100° F minimum</i>
<i>No. 4</i>	<i>130° F minimum</i>
<i>Sulfur</i>	
<i>No. 2</i>	<i>0.5% maximum (by weight)</i>
<i>No. 4</i>	<i>2.0% maximum (by weight)</i>
<i>Ash</i>	<i>1.0% maximum</i>

Testing [15A NCAC 2D .0605]

- b. *The DAQ reserves the right to require additional testing and/or monitoring of the recycled fuel oil on an annual basis or without notice.*

Monitoring/Recordkeeping [15A NCAC 2D .0605]

- c. *The Permittee is responsible for ensuring that the recycled fuel oil, as received at the site, meets the approved criteria for unadulterated fuel. The Permittee is held responsible for any discrepancies discovered by DAQ as a result of any sampling and analysis of the fuel oil.*
- d. *The Permittee shall maintain at the facility for a minimum of three years, and shall make available to representatives of the DAQ upon request, accurate records of the following:*
- i. *the actual amount of recycled fuel oil delivered to, and combusted at the facility on an annual basis;*
 - ii. *each load of recycled fuel oil received shall include the following:*

- A. a delivery manifest document clearly showing the shipment content and amount, its place and date of loading, and place and date of destination;
- B. a batch specific analytical report that contains an analysis for all constituents/properties listed above. Analytical results of the samples representative of the recycled oil shipment from the vendor shall be no more than one year old when received;
- C. batch signature information consisting of the following:
 - (1) a batch number;
 - (2) tank identification with batch volume of recycled oil;
 - (3) date and time the batch completed treatment; and
 - (4) volume(s) delivered; and
- D. a certification indicating that the recycled fuel oil does not contain detectable PCBs (<2 ppm).

Reporting [15A NCAC 2D .0605]

- e. Within 30 days after each calendar year, regardless of the amount received or combusted, the Permittee shall submit in writing to the Regional Supervisor, DAQ, the following:
 - i. a summary of the results of the analytical testing for the previous 12 months; and
 - ii. the total gallons of recycled fuel oils from each approved vendor and combusted at the facility for the previous 12 months.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest year's emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)
CO	15.45
NO _x	33.08
PM ₁₀	23.98
SO ₂	90.42
VOC	5.20
Total HAP/TAP	4.86

IX. Stipulation Review

In his **July 27, 2007**, inspection report, Mr. Robert Kennedy of the FRO notes that based on observations made, the facility appeared to be in compliance with all requirements outlined in the air permit. He also noted that some of the equipment added to the permit in the **March 8, 2007** modification was still not in operation at the time of the inspection.

In his November 6, 2007, Air Permit Regional P&O, Mr. Robert Kennedy of the FRO made the following permit modification issues:

1. The Permittee has not requested changes to the renewed air permit. However, FRO recommends adding a stipulation requiring a stack test of the coal-fired boiler (**ID No. ESB1**) within the first year of the renewed permit. The previous test in May 2000 barely indicated compliance with both the particulate standard and visible emissions. Since 2000 there have been complaints of soot fallout and high VE observations. *Agree, Section 2.1 B.1.c has been added to the permit to require testing by [date one year from permit issuance].*

Note: The following issues were raised by Robert Kennedy following his June 13, 2007 inspection of the facility. They were originally addressed by Jenny Kelvington in a June 25 email response. FRO included them once again as additional items below.

2. **Issue 1** - The 15A NCAC 2D .0515 particulate condition of Section 2.1 A.1 does not mention CDSH1 controlling ESSH1. Does this mean there is no permit requirement to operate a control device on ESSH1?
JK's original response – Uncontrolled emissions from this source are less than the 2D .0515 allowable, thus CDSH1 is not needed for compliance.
FRO's concern – If a control device exhausts to the atmosphere, the emissions from the source are controlled, and the permit must establish inspection and maintenance requirements.
DAQ's response – It should be noted that the Permittee also noted this same fact. Therefore, the renewed permit will include CDSH1 in the I&M requirements.
3. **Issue 2** – Bagfilters CDSH1 and CDSH2 exhaust inside the building. Should these control devices be listed on the permit?
JK's original response – The Permittee has requested that the machines and control devices be added to the permit in the event they determine that it is more energy efficient to exhaust outside certain times of the year. Because of the nature of the particulate material, the control devices are not required to control visible emissions.
FRO's concern – If a bagfilter is in place, the assumption is that the size of the material collected can cause particulate and visible emissions.
DAQ's response – No change.
4. **Issue 3** – Only one tenter frame has been installed and there are no plans to install the second tenter frame.
DAQ's response – The permit was modified and approval was given for the construction and operation of two tenter frames (**ID Nos. ESTF1 and ESTF2**). The permit will not need to be modified until such time as the Permittee requests that the second be removed. Otherwise, the Permittee has no time limit as to when construction of the second source should begin. In the meantime, the Permittee has requested that the MRR requirements be modified to reflect that only one source is constructed at this time and that the requirements will only apply to the second source upon its construction.
5. **Issue 4** – The thermal oxidizer (**ID No. CDOX2**) earmarked for the second tenter frame (**ID No. ESTF2**) is being installed on the carbonizer/dryer (**ID No. I-CD**). Will the addition of the TO cause the carbonizer to become a permitted emission source?
JK's original response – The facility has demonstrated that potential emissions from the carbonizer/dryer are less than 5 tons per year. Connecting emissions to the TO is just considered best practices and not required to be permitted.
FRO's concern – The company is freely connecting equipment to control devices without any notification or application to the DAQ regional office. FRO has no written record of this control scenario. At a minimum, the scenario needs to be included in the insignificant list.
DAQ's response – Agree, control scenario will be added to insignificant list.
6. **Issue 5** – The permit does not contain any inspection and maintenance requirements for the cyclone (**ID No. CDSN1**) or scrubber (**ID No. CDSN2**) controlling the Singer (**ID No. ESSN1**). Why is there no inspection and maintenance since these control devices do exhaust through the roof?

JK's original response – Uncontrolled emissions from this source are less than the allowable, thus the control devices are not required for compliance. They are packaged with the source by the manufacturer for those cases where venting indoors is needed.

FRO's concern – FRO requests an inspection and maintenance condition for all control equipment that exhaust to the atmosphere. FRO agrees that no VE requirements are required at this time.

DAQ's response – No change. It should be noted that the permit does include a requirement that the Permittee track process records to verify emissions remain below the particulate allowable.

A draft permit and associated review were sent to the Permittee and FRO prior to the public notice period. The following issues were raised and not implemented in the final draft permit.

1. The FRO had recommended testing of the coal-fired boiler. Testing is required under 2D .0515. FRO would also like to see a requirement for a Method 9 test under 2D .0521. The facility has numerous VE compliance issues and barely showed compliance with 2D .0521 during the last VE. *No change. The Permittee is required to monitor the coal-fired boiler daily during operation. A one-time Method 9 test would not tell us anything. If their daily look was anywhere near the standard, a Method 9 would have to be done anyway.*

2. Permit condition 2.1 E.3 addresses monitoring and maintenance for the thermal oxidizers CDOX1 and CDOX2 installed on the tenter frames 1 and 2. Tenter frame 2 is not installed at this time. Current conditions require an annual internal inspection of the combustion chamber of each oxidizer. In order to avoid any uncertainty regarding compliance and inspection requirements and the deemed noncompliance for these requirements, the Permittee requests that language be included that documents “non-operation” conditions. *No change. General Provision LL, Reporting Requirements for Non-Operational Equipment, indicates that the Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring, recordkeeping, and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.*

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall 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 shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is an affected State within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

FRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with FRO's recommendation to issue the renewed air permit.