

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date:** **Date, 2006**

**Region:** Asheville Regional Office  
**County:** Henderson  
**NC Facility ID:** 4500017  
**Inspector's Name:** Mike Parkin  
**Date of Last Inspection:** 01/26/2006  
**Compliance Code:** 4/In Compliance - Certification

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>	
<b>Applicant (Facility's Name):</b> Coats American, Inc. d/b/a Coats North America  <b>Facility Address:</b> Coats American, Inc. d/b/a Coats North America 1710 Brevard Road Hendersonville, NC 29739  <b>SIC:</b> 2284 / Thread Mills <b>NAICS:</b> 313312 / Textile and Fabric Finishing (except Broadwoven Fabric) Mills  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>	
<b>Contact Data</b>			<b>Application Data</b>	
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 4500017.06A <b>Date Received:</b> 08/01/2006 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04795/T11 <b>Existing Permit Issue Date:</b> 09/02/2005 <b>Existing Permit Expiration Date:</b> 06/30/2007	
Dennis Daveluy Plant Manager (828) 693-4222 P O Box 130 Hendersonville NC, 28793+0130	Dennis Daveluy Plant Manager (828) 693-4222 P O Box 130 Hendersonville NC, 28793+0130	Guy Lowe Project Engineer (706) 886-2141 P O Box 670 Toccoa GA, 30577		
<b>Review Engineer:</b> Purva Prabhu  <b>Review Engineer's Signature:</b>		<b>Date:</b> 10/20/2006	<b>Comments / Recommendations:</b> <b>Issue</b> 04795/T12 <b>Permit Issue Date:</b> <b>Date, 2006</b> <b>Permit Expiration Date:</b> <b>Date, year</b>	

**1. Purpose of Application**

Coats American, Inc. d/b/a Coats North America is currently operating under permit 04795T11, which was issued on September 2, 2005 and will expire on June 30, 2007. The renewal application was received on August 1, 2006 or at least nine months prior to the expiration date. The permit is deemed complete for processing. The Permittee did not request any modifications to the permit as part of this renewal process. However they requested the following administrative changes to some of the emission sources as part of this renewal:

- Revision to the description of the drug room (Source ID No. SRC-DR) – Facility requested to remove details regarding number of tanks in the description of this emission source. It was based on a recommendation made by DAQ to the facility via letter dated February 13, 2006. The recommendation stated as follows:  
 “Your permit renewal application should reflect that the “drug room” contains 20 tanks, or, a request should be made to have the permit amended to indicate “drug room”, regardless of the number of tanks, since all emissions exit the facility in the same location”.

- Revision to the description of the emission sources SRC-2F, SRC-3F, SRC-4F – Facility requested to make similar changes to these sources as well. They do not want to include specific number of tanks in the description of these sources.

Above changes were made to both ESM and the permit. As per informed by the facility, emissions from all of the above sources are accounted for in the towers.

## 2. Facility Description

This facility primarily coats high strength thread with a polymer; much of the thread is used in the automotive industry to produce items such as seat belts and air bags.

## 3. Application Chronology

August 1, 2006	Application for renewal (Application No. – 4500017.06A) was received. Facility submitted the following: <ul style="list-style-type: none"> <li>• Form AA, AA2, A3</li> </ul>
October 17, 2006	Email was sent to Mike Parkins, regional contact for comments. Mike informed that he does not have any comments at this time and will send his comments after reviewing the draft permit.
October 17, 2006	Email was sent to Guy Lowe (facility permit contact) to verify the site address for the facility. The following is the correct site address. 1710 Brevard Road Hendersonville, NC 28793 Changes were made to the permit and IBEAM.
October 19, 2006	Called Mr. Guy Lowe to verify insignificant emission source I-QC-Lab. He informed that this source is an existing source at the facility. Added this source to the permit. It was already present in ESM.
October 23, 2006	Draft permit and review was sent to the Permittee and the region for comments.
October 24, 2006	Received comments from region as follows: "I looked over the draft permit and your review and it looked good. The only issue I found was in the table of modifications, which states, "please note that annual compliance certification submission date has been changed to January 30." I believe this should state: ...changed to March 1. Other than this, the permit should be ready to issue". The above change is made to the permit.
November 3, 2006	Received comments from the Permittee and they are discussed at the end of this document.
November 6, 2006	Revised permit with changes was sent to the Permittee.
November 14, 2006	Received comments from the Permittee and they are discussed at the end of this document.
November 16, 2006	Revised draft permit and review as per comments from Permittee was sent to the region.
November 27, 2006	Region did not have any comments on the draft permit and review.

#### 4. Permit History

The following list provides a very brief summary of the Title V permit revisions for this facility:

Permit No.	Issuance Date	Description of revision
04795/T11	September 2, 2005	TV-Minor modification. Facility wanted to do the following: a. Removal of existing natural gas/No. 2 fuel oil-fired boiler ID No. SRC-B-2 (8.4 million BTU per hour maximum heat input). b. Addition of natural gas/No. 2 fuel oil-fired boiler ID No. SRC-B-3 (8.5 million BTU per hour maximum heat input).
04795/T10	August 6, 2004	Significant modification. This application was for adding MACT avoidance condition for all applicable MACTs.
04795/T09	July 11, 2002	Initial Title V permit issued.

#### 5. Facility compliance status / Statement of compliance

This facility was last inspected by Mr. Mike Parkin of ARO on January 26, 2006. The facility was in compliance with all air quality requirements.

#### 6. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2Q .0317, Avoidance Condition for 15A NCAC 2D .0530: PSD AVOIDANCE CONDITION  
15A NCAC 2Q .0317, Avoidance Condition for 15A NCAC 2D .2100 (Risk management plan) / 40 CFR Part 68 (Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r))  
15A NCAC 2D .0503: Particulate emissions from fuel burning indirect heat exchangers  
15A NCAC 2D .0516: Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2Q .0317: MACT MAJOR FACILITY DESIGNATION AVOIDANCE CONDITION  
15A NCAC 2D .0958: Work practices for sources of volatile organic compounds  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

No regulatory review is required for these existing permit conditions as part of the renewal process.

#### 7. NSPS, NESHAPS/MACT, PSD, attainment status, 112(r), CAM

**NSPS** – The facility is not subject to any applicable NSPS requirements. This renewal action does not change this status.

**NESHAPS/MACT** – Facility has MACT avoidance condition in the permit for any applicable MACT by limiting the potential HAP emissions to less than 10 tpy for any single HAP and less than 25 tpy for total HAPs per consecutive 12 month period.

**PSD** – The facility is a major source for PSD due to VOC emissions.

**Attainment status**- Henderson county is in attainment for all criteria pollutants.

**112(r)** – Facility has avoidance condition for 15A NCAC 2D .2100 (RISK MANAGEMENT PLAN) / 40 CFR Part 68 (Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)). The facility cannot store more than 3,000 gallons of methaform in the tank at any time.

**CAM** – 40 CFR 64 requires that a continuous 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. This facility does not have any control device on any of the emission sources and hence CAM does not apply.

## 8. Facility Wide Air Toxics

Current permit does not address any toxics condition.

Initial Title V permit review (permit was issued on July 11, 2002) stated that this facility was constructed prior to October 1, 1993 and toxics did not apply to this facility.

The facility is planning on modifying some other sources as informed via letter dated October 9, 2006 to Ashville regional office. This modification will trigger the facility in toxics for formaldehyde. Facility will include all other sources at the facility that emit formaldehyde for this toxics evaluation.

## 9. Facility Emissions Review

The following table represents actual emissions for year 2004 and it is taken from emissions inventory of the facility:

Pollutant(s)	2004 Actual Emissions (tpy)
CO	1.64
NO <sub>x</sub>	1.97
PM-10	0.12
SO <sub>2</sub>	0.01
VOC	285.74
Largets HAP (methanol)	3.2 (<10)
Total HAP	<25

## 10. Stipulation Review/ Permit Modifications/Changes

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

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-added insignificant source I-QC-Lab (existing source in ESM) -revised equipment ID numbers and reorganized some of the sources to match ESM
Cover	-	-amended all dates and permit revision numbers
Cover 1		- Revised site address for the facility based on email from the permit contact Mr. Guy Lowe.
TOC	-	-updated shell titles -removed part II
All	Header	-amended permit revision number
3, 4	- Equipment Table	-updated shell titles -revised description of the sources SRC-DR, SRC-2F, SRC-3F and SRC-4F as requested by the Permittee - removed note for emission source SRC-B-3. This source is already constructed as per the inspection report for the facility.
4	2.1 A	-revised emission source description to match the equipment table on page 3
5	2.1A	-added reference for 15A NCAC 2D .2100 (40 CFR Part 68) avoidance. It was listed under separate section in the earlier revision. Limits/Standards for this avoidance condition was changed from methaform storage to formaldehyde storage as requested by the permittee.
5	2.1A.2.a	-reference was made to emission sources instead of emission point

5	2.1.A.3	-revised title for 2Q .0317 stipulation
6	2.1.A.4	-moved condition 15A NCAC 2D .2100 (40 CFR Part 68) avoidance from 2.1.D(earlier revision) and included under 2.1.A. Also removed reference for state only and federal only requirement as this federal requirement is approved under SIP. Limit on methaform storage was removed and only formaldehyde limit was kept as requested by the facility.
7	2.1.B	-revised emission source description to match the equipment table on page 3
7,8	2.1.B	-added reference to source ID No. SRC-TB-P in 2D .0521 condition
9	2.1.C	-revised emission source description to match the equipment table on page 3
9	2.1.C.2.a	-removed individual listing of emission sources
11 (old permit)	2.2.A.2.a	-removed reference for condition 2D. 0902
22 (old permit)	Part II	-removed part II as emission source natural gas/No. 2 fuel oil-fired Boiler #3 (ID No. SRC-B-3) is already constructed as per the inspection report for the facility
12-19	General Conditions	-updated shell conditions -please note that annual compliance certification submission date has been changed to March 1.

Minor changes were made to the description of some of the sources in ESM to match the permit and it is given in the following table.

Equipment ID No.	Old ESM Description	New ESM Description
I-TANK-IPA-2	one isopropyl alcohol storage tank (6,000 gallon)	one above ground isopropyl alcohol storage tank (6,000 gallon)
I-TANK-MEOH	one methanol storage tank (10,000 gallon)	one above ground methanol storage tank (10,000 gallon)
SRC-B-1	natural gas/No. 2 fuel oil-fired boiler (8.4 million Btu/hour heat input)	natural gas/No. 2 fuel oil-fired boiler # 1(8.4 million Btu/hour heat input)
SRC-B-3	natural gas/No. 2 fuel oil-fired boiler (8.5 MBtu/hr)	natural gas/No. 2 fuel oil-fired boiler # 3 (8.5 MBtu/hr heat input)

Description of the following sources was changed in both ESM and the permit as requested by the facility.

Equipment ID No.	Old ESM and PERMIT Description	New ESM and PERMIT Description
SRC-DR	drug room (14 storage tanks of varying capacities and associated valves, pumps, fittings, and distribution lines)	drug room (storage tanks of varying capacities and associated valves, pumps, fittings, and distribution lines)
SRC-2F	storage/mixing tanks (16 storage tanks of varying capacities and associated valves, pumps, fittings, and distribution lines)	storage/mixing tanks and associated valves, pumps, fittings, and distribution lines
SRC-3F	four tanks and associated valves, pumps, fittings, and distribution lines	storage/mixing tanks and associated valves, pumps, fittings, and distribution lines
SRC-4F	two tanks and associated valves, pumps, fittings, and distribution lines	storage/mixing tanks and associated valves, pumps, fittings, and distribution lines

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

**To be completed later**

## 12. Conclusions, Comments, and Recommendations

All applicable DAQ air requirements should be met. I recommend issuance of the air permit.

### Permittee Comments and DAQ Response:

The draft permit and review was sent to the Permittee on 10/23/06 for review. The Permittee responded with comments on 11/3/06. The Permittee comments and DAQ response are as follows:

#### **Permit**

Comment 1:

Page 5, - Reference is made to Formaldehyde RMP avoidance. The permit lists "no more than 3,00 gal. of methaform may be stored at any one time...". Page 6 lists that no more than 15,000 lbs of formaldehyde (3,000 gal. of methaform) may be stored at any one time. It would be more appropriate to limit the formaldehyde to only "no more than 15,000 lb may be stored at any one time..." since the RMP is site wide and there may be other small sources of formaldehyde in addition to the methaform tank.

Response: Above change will be made to the permit.

Comment 2:

The expiration date for the new permit was listed as Sep. 30, 2011. It should be 5 years from its effective date.

Response: The issue date and expiration date will be put in the permit during permit issuance.

Comment 3:

The renewal application due date was listed as 9 months before the expiration date. The EPA allows submittal 6 months before expiration. Do we still need to submit 9 months before expiration?

Response:

Renewal application needs to be submitted 9 months before expiration as per NCAC 2D .0513 (b).

Revised permit was sent to the facility on November 6, 2006 and the comments were received on November 14, 2006.

Comment1:

The zip code for the physical address is 29739. I believe this shows up only on page 1 of the permit. (Note: The mailing address zip code is 28793 and this is listed correctly on page 1 of the permit).

Response:

Above change will be made to the permit.