

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2009**

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100863
Inspector's Name: Eric Hudson
Date of Last Inspection: 04/30/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Cone Denim LLC - White Oak Plant Facility Address: Cone Denim LLC - White Oak Plant 2420 Fairview Street Greensboro, NC 27405 SIC: 2211 / Weaving Mills, Cotton NAICS: 31321 / 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: 4100863.06B Date Received: 09/14/2006 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03470/T18 Existing Permit Issue Date: 05/01/2006 Existing Permit Expiration Date: 07/31/2007
Gene Swift Plant Engineer (336) 230-7217 White Oak Plant Greensboro, NC 27405	Brad Johnson Plant Manager (336) 230-7217 White Oak Plant Greensboro, NC 27405	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, 2009		Comments / Recommendations: Issue 03470/T19 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2015	

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 (**03470T18**) was issued on **May 1, 2006**, and expired on **July 31, 2007**. However, the renewal application was received on **September 14, 2006**, or at least nine months prior to the expiration date. Therefore, the existing permit is shielded from expiration 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.

II. Facility Description

The facility is a denim manufacturer.

III. History/Background/Application Chronology

April 13, 1998 – Permit **03470T13** was issued as the first time Title V permit.

August 26, 2002 – Permit **03470T14** issued as a significant modification for the replacement of boiler **ES-B4** with **ES-B6** and to add a PSD avoidance condition.

September 4, 2002 – Permit **03470T15** issued as an administrative amendment.

June 20, 2003 – Permit **03470T16** issued as an administrative amendment.

May 6, 2005 – Permit **03470T17** issued as an ownership/name change.

October 18, 2005 – Letter approving revised Maximum Feasible Control Plan (MFCP) submitted as required under 15A NCAC 2D .1807 was sent to the Permittee from DAQ. The letter included a requirement that a permit application be submitted for permit modification by **December 15, 2005** for the MFCP changes to the wastewater pretreatment plant and additional equipment used to minimize or eliminate the generation of odorous compounds from the facility.

May 4, 2006 – Permit **03470T18** was issued as a minor modification for the addition of a tenter frame and inclusion of the MFCP requirements.

September 14, 2006 – Permit application **4100963.06B** received and deemed complete for processing. Application was originally assigned to Ms. Judy Lee for processing.

September 26, 2006 – Ms. Judy Lee sent Permittee an “Add Info Letter” for the following reasons:

1. the renewal application should have contained a CAM applicability analysis for each control device;
2. the renewal application should have contained a list of any potential MACT Standards that may apply with justification of why/why not a standard is applicable; and
3. the renewal application should have contained Form A3 – 112r applicability information.

October 3, 2006 – Received WSRO’s “Comments and Recommendations on Air Permit Application” from Eric Hudson. Those comments included the following:

1. during the **March 15, 2006** inspection, Mr. Toompas expressed interest in having coal and used No. 2 oil removed from the permit. May also remove “mothballed” equipment.
2. be consistent on annual inspection and maintenance inspections (every 12 months).
3. condition 2.1 C.2.h should require semiannual reporting.
4. WSRO occasionally receives soot complaints about boilers. Stack test requirements for No. 6 oil should be added to the permit. Need to stagger testing so one boiler per year. (Note. WSRO verified via **September 19, 2009** email that they no longer wanted to test for particulate as the facility no longer ~rarely~ fired No. 6 fuel oil. Therefore, this comment has been disregarded as part of the permit renewal).

October 13, 2006 – Permittee submitted response to Ms. Judy Lee's **September 26, 2006** add info letter. That letter included a statement that “we do not have a process that would be a major emitter of pollutants that has a control device that would need Compliance Assurance Monitoring (CAM) and therefore have not submitted and are exempt from the CAM requirements.” The response letter also indicated that the facility was classified as a Title III minor source and included Form A-3 as requested. *Writers note...although the Permittee indicated that no sources/control devices were subject to CAM, no emission calculations were provided to verify. They should be submitted prior to issuance of the renewed permit for inclusion in this Document. This fact was brought to the attention to the new facility contact, Mike Garlic in an email on **September 4, 2009** from Mark Cuilla.*

January 30, 2007 – Ms. Judy Lee received a fax from Eric Hudson of the WSRO including a copy of a **January 11, 2007** letter from Mr. Arthur Toompas of Cone Denim to Mr. Hudson. That letter was to provide information to “clean up” the permit and remove equipment that will no longer be operated. In addition to these sources, the Permittee also requested that the capability to combust coal be removed from boiler #3. Also the Permittee indicated that **ES-OE3** would be closing at the end of the first quarter (**March 31, 2007**). Specific equipment to remove include:

Boiler No. 2 (**ID No. ES-B2**)

Boiler No. 3 (**ID No. ES-B3**; coal only)

Multicyclone (**ID No. CD-B3MC**) [with the removal of coal combustion]

Electrostatic precipitator (**ID No. CD-B3B4ESP**) [with the removal of coal combustion]

Raw Stock Dye Machine (**ID No. ES-RSDM**)

Open End Spinning Air Filtration Equipment (**ID No. ES-OE1**) with associated rotary drum filters and condensers as listed in the permit

Electrical Shop

Natural gas-fired bakeoff oven (**ID No. ES-BO1**) with associated afterburner (**ID No. CD-BO1**)

Open End Spinning (**ID No. ES-OE3**) with associated rotary drum filters and condensers as listed in the permit (following third quarter **2007**)

January 1, 2008 – Renewal application **4100863.06B** transferred to Mr. Jeff Twisdale for processing.

September 2, 2009 – Renewal application **4100863.06B** transferred to Mr. Mark Cuilla for processing.

September 4, 2009 – Permittee sent via email a version of the marked-up permit verifying sources to be deleted as part of the permit renewal process. In addition, the Permittee requested clarification that the renewed permit should include visible emission monitoring/recordkeeping/reporting exclusion for the combustion of natural gas and that landfill gas be listed as an allowed fuel. (Note that the latest inspection report by the WSRO indicates that “all the boilers are permitted to burn landfill gas and because an analysis of the gas indicated that 99.9% of its constituents consisted of methane and water vapor, this fuel was listed as natural gas, although it has less Btu value.”) The Permittee is investigating the closure of the polishing plant in the Control and Prohibition of Odorous emissions Section. This is one of the main potential sources of odors at the wastewater plant. Before treatment of the wastewater by the City of Greensboro, the permit requires that the water pass through the polishing pond. This action is outside the renewal of the permit and should be addressed as part of a permit modification as the odor control requirements are part of an approved Maximum Feasible Odor Control Plan approved by DAQ.

December 21, 2009 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

date, 2009 – DRAFT permit sent to 30-day public notice and 45-day 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.

Pages	Section	Description of Changes
Attachment	Insignificant activities	-added sizes of diesel fired fire pumps per WSRO
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed all references to Part II (here and throughout the permit)
All	Header	-amended permit revision number
3-5	Equipment Table	-removed equipment per Permittee request -amended descriptions as necessary as noted in the WSRO inspection report -amended descriptions as necessary per current ESM guidelines -removed asterisks and associated language from previous permit modifications
6-10	2.1 A	-removed reference to boiler (ID No. ES-B2) throughout Section per Permittee request -combined former Sections 2.1 A through 2.1 C to group all boilers under one Section (renumbered subsequent Sections accordingly) -added landfill gas as an available fuel per Permittee request (Note-DAQ has permitted combustion of landfill gas previously and referenced it in the permit as natural gas) -updated shell language for each applicable regulation -added “no monitoring/recordkeeping/reporting” language for natural gas/landfill gas/No. 6 fuel oil/waste oil as appropriate -added ID numbers
10	2.1 B.1.a 2.1 B.1.b	-added ID numbers -amended shell language, corrected testing rule cross reference, and corrected Section reference
11	2.1 B.1.c 2.1 B.1.d	-updated shell language and added ID numbers -updated shell language
12	2.1 B.2.a 2.1 B.2.b 2.1 B.2.c	-added ID numbers -amended shell language, corrected testing rule cross reference, and corrected Section reference -updated shell language and added ID numbers
13	2.1 C.1.a 2.1 C.1.b	-added ID numbers -amended shell language, corrected testing rule cross reference, and corrected Section reference
14	2.1 C.1.c 2.1 C.1.d-h 2.1 C.2.a 2.1 C.2.b	-added ID numbers -added monitoring/recordkeeping/reporting language for controlled source (ID No. ES-TF2) -added ID numbers -updated shell language

Pages	Section	Description of Changes
15	2.1 C.2.c 2.1 C.3.a 2.1 C.3.b 2.1 C.3.c	-added ID numbers -added ID numbers -amended shell language, corrected testing rule cross reference, and corrected Section reference -updated shell language and added ID numbers
16	2.1 D.1.b	-updated shell language and added ID numbers
17	2.1 D.2.a 2.1 D.2.b 2.1 D.2.c	-added ID numbers -corrected testing rule cross reference, and corrected Section reference -updated shell language and added ID numbers
18	2.1 E	-added control device ID numbers to equipment descriptions
19	2.1 E.1.a 2.1 E.1.b 2.1 E.1.c 2.1 E.1.d 2.1 E.1.e	-added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language and added ID numbers -updated shell language -updated shell language
20	2.1 E.2.a 2.1 E.2.b 2.1 E.2.c 2.1 E.2.d	-added ID numbers -added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language and added ID numbers
21	2.1 F.1.a 2.1 F.1.b	-added ID numbers -corrected testing rule cross reference and corrected Section reference
22	2.1 F.1.c 2.1 F.1.d 2.1 F.1.e 2.1 F.2.a 2.1 F.2.b 2.1 F.2.c	-updated shell language and added ID numbers -updated shell language -updated shell language -added ID numbers -added ID numbers -corrected testing rule cross reference and corrected Section reference
23	2.1 F.2.d	-updated shell language and added ID numbers
24	2.1 G.1.a 2.1 G.1.b 2.1 G.1.c 2.1 G.1.d 2.1 G.1.e	-added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language and added ID numbers -updated shell language -updated shell language
25	2.1 G.2.a 2.1 G.2.b 2.1 G.2.c	-added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language and added ID numbers
26	2.1 H.1.a 2.1 H.1.b 2.1 H.1.c	-added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language

Pages	Section	Description of Changes
27	2.1 H.1.d 2.1 H.2.a 2.1 H.2.b 2.1 H.2.c	-updated shell language -added ID numbers -corrected testing rule cross reference and corrected Section reference -updated shell language and added ID numbers
29	2.2 A.2.b	-updated shell language
30	2.2 A.3	-updated shell language
30-40	General Conditions	-updated conditions (v3.1)
-	Part II	-removed Part II

The following table indicates the required Emission Source Module modifications necessary as part of this permit renewal.

Current Description	Modified Description
Natural gas/No. 6 fuel oil-fired boiler; 124 million Btu per hour heat input (ID No. ES-B2)	End-dated per Permittee request
Natural gas/coal/No. 6 fuel oil-fired boiler; 117 million Btu per hour heat input (ID No. ES-B3)	One natural gas/landfill gas/No. 6 fuel oil-fired boiler (117 million Btu per hour maximum heat input capacity; ID No. ES-B3)
Multicyclone with 64 nine-inch diameter tubes (ID No. CD-B3MC)	End-dated per Permittee request
Electrostatic precipitator (ID No. CD-B3B4ESP)	End-dated per Permittee request
Raw stock dye machine; 3,000 pounds per hour input (ID No. ES-RSDM)	End-dated per Permittee request
Mist eliminator (ID No. CD-ME)	End-dated per Permittee request
Ring spinning; 10,000 pounds per hour input (ID No. ES-RS)	End-dated per Permittee request
Rotary drum filters (ID Nos. CD-RD550201, CD-RD550202, CD-RD550401, CD-RD550402, CD-RD550601 through CD-RD550603, and CD-RD552001 through CD-RD552003)	End-dated per Permittee request
Condensers (ID Nos. CD-C550211, CD-C550212, CD-C550311, and CD-C551911 through CD-C551913)	End-dated per Permittee request
Open end spinning I; 32,000 pounds per hour input (ID No. ES-OE1)	End-dated per Permittee request
Rotary drum filters (ID Nos. CD-RD552201, CD-RD552301, CD-RD552401, CD-RD552501, CD-RD552601, and CD-RD552701)	End-dated per Permittee request
Condensers (ID Nos. CD-C552211, CD-C552311, CD-C552411, CD-C552511, CD-C552611, CD-C552711, and CD-C552811)	End-dated per Permittee request
Open end spinning III; 32,000 pounds per hour input (ID No. ES-OE3)	End-dated per Permittee request
Rotary drum filters (ID Nos. CD-RD552901 through CD-RD552904)	End-dated per Permittee request
Condensers (ID Nos. CD-C552911 through CD-C552913)	End-dated per Permittee request

Current Description	Modified Description
Natural gas-fired bake-off oven; 150 pounds per hour input (ID No. ES-B01)	End-dated per Permittee request
Afterburner; 630,000 total Btu per hour heat input capacity (ID No. CD-B01)	End-dated per Permittee request

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 .0512, Particulates from Wood Products Finishing Plants
- 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 .0605, Recordkeeping Requirement
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)
- 15A NCAC 2Q .0700, Control of Air Toxics (On-site recycled No. 2 fuel oil requirements)

A regulatory review for these current permit conditions will not be included in this document.

As part of this permit renewal, the Permittee has requested that boiler (ID No. ES-B2) be removed from the permit. As a note, a historical look at the allowable particulate emission rate per 15A NCAC 2D .0503 is included here in the event that the Permittee wishes to add boiler capacity in the future.

Original permit issuance-

$$E = 1.090 \times Q^{-.2594}$$

$$Q_t = QB1 + QB2 + QB3 + QB4 = 124 + 124 + 117 + 207 = 572$$

E = 0.21 pounds per million Btu per boiler

1st permit modification-

$$E = 1.090 \times Q/.2594$$

$$Q_t = QB1 + QB2 + QB3 + QB5 = 124 + 124 + 117 + 96.5 = 461.5$$

E = 0.22 pounds per million Btu for boiler B5 and 0.21 pounds per million Btu for boilers B1, B2, and B3

Renewal with requested removed boiler B2-

Allowable remains set for all existing boilers B1, B3, and B5.

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 classified as a Title III minor source as potential emissions of any single hazardous air pollutant (HAP) are below 10 tons per year and a combination of all HAPs is less than 25 tons per year. Therefore, the facility is not subject to any major source Maximum Achievable Control Technology standards.

The facility currently operates the following equipment as insignificant activities:

1. one diesel-fired emergency generator (**ID No. IES-EG**). This 1993 Caterpillar is rated at 375 horsepower and 200 kilowatts.
2. one diesel-fired emergency fire pump (**ID No. IES-FP**). This 1983 Cummings is rated at 340 horsepower.
3. one diesel-fired emergency fire pump (**ID No. IES-FP**). This 1982 Detroit Diesel is rated at 235 horsepower.

40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, was amended **January 18, 2008** to establish emission and operating limitations for applicable sources located at both major and area sources of HAP emissions. As shown above, this facility is classified as an area source. The Subpart defines an affected source as any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions [63.6590(a)]. An existing unit located at an area source is one that commenced construction or reconstruction before **January 12, 2006** [63.6590(a)(1)(iii)]. The emergency generators and fire pumps at the facility can be classified as existing for the purposes of this Subpart. As such, they are exempt from this Subpart per 63.6590(b)(3), Stationary RICE subject to limited requirements. This paragraph states “*A stationary RICE which is an existing emergency stationary RICE does not have to meet the requirements of this Subpart and of Subpart A of this Part. No initial notification is necessary.*” No notation of this exemption is necessary as part of this permit renewal.

The facility was also compared to the list of currently promulgated area source GACT standards in 40 CFR 63. At this time there appears to be no applicable GACTs that apply.

PSD – The facility is currently subject to one PSD avoidance condition. Natural gas/No. 6 fuel oil fired boiler (**ID No. ES-B5**) is limited to less than 15 tons PM₁₀ per consecutive 12-month period. To ensure compliance, the Permittee shall not combust more than 1,776,000 gallons of No. 6 fuel oil with 2.1 weight percent maximum sulfur content per consecutive 12-month period. This permit renewal does not affect this status.

Summary of PSD Avoidance Condition (see Mike Brandon’s **June 10, 2002-03470T14 Air Permit Review** for full details) – The Permittee submitted a permit application to replace a once existing natural gas/No. 6 fuel oil/coal-fired boiler (**ID No. ES-B4**) with a natural gas/No. 6 fuel oil-fired boiler (**ID No. ES-B5**). The Permittee performed a netting exercise using the latest two year average consumption records of each representative fuel type for the existing boiler. Worst case pollutant levels were calculated for the existing boiler. These levels were subtracted from the potential emission levels for the proposed new boiler. Each resulting total was compared to the PSD significance level for each criteria pollutant. The remaining increases for PM, PM₁₀, and SO₂ were each found to be above the significance level, therefore, the Permittee calculated an operating limitation (e.g., fuel limitation) which resulted in all increases remaining below the respective significance levels. At 1,776,000 gallons of 2.1 percent No. 6 fuel oil, the netted PM₁₀ emissions are calculated to be less than the PSD significance level of 15 tons per year. As a result, the permit was modified to include the specific fuel restrictions in order to meet the 15 tons per year limit.

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 table indicates all current equipment/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-CFWS1 ES-CFWS2 ES-CFWS3 ES-CFWS4A ES-CFWS4B ES-CFWS5A ES-CFWS5B ES-CFWS6A ES-CFWS6B ES-CFWS7A ES-CFWS7B	Eleven cotton fibers waste systems (100, 100, 72, 50, 50, 50, 50, 36, 36, 36, and 36 pounds per hour inputs, respectively)	CD-CFWS1 CD-CFWS2 CD-CFWS3 CD-CFWS4A CD-CFWS4B CD-CFWS5A CD-CFWS5B CD-CFWS6A CD-CFWS6B CD-CFWS7A CD-CFWS7B	Eleven bagfilters (188 square feet of filter area each)
ES-CFBF	Waste system for the 11 cotton fibers bagfilter hoppers (60 pounds per hour input)	CD-CFBF	One pulse jet bagfilter (140 square feet of filter area)
ES-TF2	One seven-zone indirect fire natural gas-fired tenter frame (12.5 million Btu per hour maximum heat input capacity and 11,000 pounds per hour input)	CD-TF2	One afterburner (2.0 million Btu per hour maximum heat input capacity) used on an as needed basis for opacity control
ES-CARP	Carpenter shop	CD-CARP	One cyclone (72 inches in diameter)
ES-OCB	Opening, cleaning, blending (15,000 pounds per hour input)	CD-RD551601 CD-RD551602 CD-RD551603 CD-RD553001 CD-C553011 CD-RD553101 CD-RD553201 CD-C553211 CD-RD553301 CD-RD553501 CD-C553511	Rotary drum filter Rotary drum filter Rotary drum filter Rotary drum filter Condenser Rotary drum filter Rotary drum filter Condenser Rotary drum filter Rotary drum filter Condenser

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-CARD	Carding (9,500 pounds per hour input)	CD-RD551101 CD-C551111 CD-RD551102 CD-C551112 CD-RD551103 CD-C551113 CD-C551114 CD-RD551104 CD-RD551105 CD-C551115 CD-RD551106 CD-C551116 CD-RD551801 CD-C551811 CD-RD551802 CD-C551812 CD-RD551803 CD-C551813 CD-RD551804 CD-C551814	Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Condenser Rotary drum filter Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser
ES-FIN	Finishing (7,488 pounds per hour input)	CD-RD552101 CD-C552111	Rotary drum filter Condenser
ES-BS	Beaming and slashing (6,000 pounds per hour input)	CD-RD551301 CD-RD551302 CD-RD551701 CD-C551711 CD-RD551702 CD-C551712 CD-RD551703 CD-C551713 CD-RD551704 CD-C551714	Rotary drum filter Rotary drum filter Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser Rotary drum filter Condenser <i>*Note. Per inspection report and clarification from the Permittee, these control devices cannot vent to the atmosphere. They are listed on the permit for operational flexibility.</i>

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-LS	Link spinning (10,000 pounds per hour input)	CD-RD550301 CD-T550311 CD-RD550302 CD-T550321 CD-RD5511401 CD-T551411 CD-RD551201 CD-T551211 CD-RD551202 CD-T551221	Rotary drum filter T3 disk prefilter Rotary drum filter T3 disk prefilter Rotary drum filter T3 disk prefilter Rotary drum filter T3 disk prefilter Rotary drum filter T3 disk prefilter
ES-WI	Winding (10,000 pounds per hour input)	CD-RD550101 CD-T550111 CD-RD550102 CD-T550121	Rotary drum filter T3 disk prefilter Rotary drum filter T3 disk prefilter <i>*Note. Per inspection report and clarification from the Permittee, these control devices cannot vent to the atmosphere. They are listed on the permit for operational flexibility.</i>
ES-WA	Warping (10,000 pounds per hour input)	CD-RD551402 CD-RD551403 CD-RD551404 CD-RD551405	Rotary drum filter Rotary drum filter Rotary drum filter Rotary drum filter <i>*Note. Per inspection report and clarification from the Permittee, these control devices cannot vent to the atmosphere. They are listed on the permit for operational flexibility.</i>
ES-PVA	PVA storage silo (28,000 pounds per hour input)	CD-PVA	One bagfilter
ES-SS	Starch storage silo (28,000 pounds per hour input)	CD-SS	One bagfilter

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-WR1	Weaving process consisting of 400 weaving machines (12,000 pounds per hour input)	CD-WRF1 through CD-WRF7	Seven roll up filters

The following table indicates the regulations applicable to each emission source/control device relationship:

Emission Source ID	Control Device ID	Applicable Regulations*	Pollutant/CAM Required?
ES-CFWS1 ES-CFWS2 ES-CFWS3 ES-CFWS4A ES-CFWS4B ES-CFWS5A ES-CFWS5B ES-CFWS6A ES-CFWS6B ES-CFWS7A ES-CFWS7B	CD-CFWS1 CD-CFWS2 CD-CFWS3 CD-CFWS4A CD-CFWS4B CD-CFWS5A CD-CFWS5B CD-CFWS6A CD-CFWS6B CD-CFWS7A CD-CFWS7B	15A NCAC 2D .0515	Particulate
ES-CFBF	CD-CFBF	15A NCAC 2D .0515	Particulate
ES-TF2	CD-TF2* *as needed for opacity emissions only	15A NCAC 2D .0515 15A NCAC 2D .0516	Particulate; No, installed for visible emissions only Sulfur dioxide; No, installed for visible emissions only
ES-CARP	CD-CARP	15A NCAC 2D .0512	Particulate
ES-OCB	CD-RD551601 CD-RD551602 CD-RD551603 CD-RD553001 CD-C553011 CD-RD553101 CD-RD553201 CD-C553211 CD-RD553301 CD-RD553501 CD-C553511	15A NCAC 2D .0515	Particulate

Emission Source ID	Control Device ID	Applicable Regulations*	Pollutant/CAM Required?
ES-CARD	CD-RD551101 CD-C551111 CD-RD551102 CD-C551112 CD-RD551103 CD-C551113 CD-C551114 CD-RD551104 CD-RD551105 CD-C551115 CD-RD551106 CD-C551116 CD-RD551801 CD-C551811 CD-RD551802 CD-C551812 CD-RD551803 CD-C551813 CD-RD551804 CD-C551814	15A NCAC 2D .0515	Particulate
ES-FIN	CD-RD552101 CD-C552111	15A NCAC 2D .0515	Particulate
ES-BS	CD-RD551301 CD-RD551302 CD-RD551701 CD-C551711 CD-RD551702 CD-C551712 CD-RD551703 CD-C551713 CD-RD551704 CD-C551714	15A NCAC 2D .0515	Particulate
ES-LS	CD-RD550301 CD-T550311 CD-RD550302 CD-T550321 CD-RD5511401 CD-T551411 CD-RD551201 CD-T551211 CD-RD551202 CD-T551221	15A NCAC 2D .0515	Particulate
ES-WI	CD-RD550101 CD-T550111 CD-RD550102 CD-T550121	15A NCAC 2D .0515	Particulate

Emission Source ID	Control Device ID	Applicable Regulations*	Pollutant/CAM Required?
ES-WA	CD-RD551402 CD-RD551403 CD-RD551404 CD-RD551405	15A NCAC 2D .0515	Particulate
ES-PVA	CD-PVA	15A NCAC 2D .0515	Particulate
ES-SS	CD-SS	15A NCAC 2D .0515	Particulate
ES-WR1	CD-WRF1 through CD- WRF7	15A NCAC 2D .0515	Particulate

** Note. This table does not list any reference to 15A NCAC 2D .0521, Control of Visible Emissions, 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds, and 15A NCAC 2D .1806, Control of Odorous Emissions. These regulations are intentionally removed from this table because the regulated pollutants are either not criteria pollutants (visible emissions and odors) or work practice standards. These pollutants are exempt from CAM applicability consideration.*

The following information was provided by the Permittee as part of the permit application. It is reproduced here for confirmation that CAM does not apply to any currently permitted control device.

White Oak: CAM DETERMINATION

PM10 % Est: from FARR Air Pollution Control Handbook-Materials Properties, Section 6, Page 11--- 98% of cotton dust is > PM125. Thus 2% is < PM125. Worst case assume all is PM10.

Cotton Fiber Waste Systems

Source ID Number	Cotton fiber waste system inputs in lbs/hr to bailer	Total cotton dust to bag filter lbs/hr	<PM125 lbs/hr before controls	<PM125 lbs/yr before controls	Control Device #	eleven bagfilters; 188 square feet of filter area each-	CAM applicability
ES-CFWS1	100	10	0.2	1752	CD-CFWS1		NO: <100 tons/yr PM10
ES-CFWS2	100	10	0.2	1752	CD-CFWS2		NO: <100 tons/yr PM10
ES-CFWS3	72	7.2	0.144	1261	CD-CFWS3		NO: <100 tons/yr PM10
ES-CFWS4A	50	5	0.1	876	CD-CFWS4A		NO: <100 tons/yr PM10
ES-CFWS4B	50	5	0.1	876	CD-CFWS4B		NO: <100 tons/yr PM10
ES-CFWS5A	50	5	0.1	876	CD-CFWS5A		NO: <100 tons/yr PM10
ES-CFWS5B	50	5	0.1	876	CD-CFWS5B		NO: <100 tons/yr PM10
ES-CFWS6A	36	3.6	0.072	631	CD-CFWS6A		NO: <100 tons/yr PM10
ES-CFWS6B	36	3.6	0.072	631	CD-CFWS6B		NO: <100 tons/yr PM10
ES-CFWS7A	36	3.6	0.072	631	CD-CFWS7A		NO: <100 tons/yr PM10
ES-CFWS7B	36	3.6	0.072	631	CD-CFWS7B		NO: <100 tons/yr PM10
ES-CFWS8	78	0.078	0.00156	14			NO: <100 tons/yr PM10
ES-CFBF	60	61.678	1.23356	10805.9856	CD-CFBF	pulse jet bagfilter; 140 square feet of filter area	NO: <100 tons/yr PM10

Carpenter Shop

ES-CARP					CD-CARP		CAM applicability NO: <100 tons/yr PM10
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It is assume an average of 1 lb/hr of sawdust goes to cyclone separator when in operation.

Uncontrolled emissions are 1X24X365= 8760 lbs/yr or 4.38 tons /yr.

Assume 70% efficiency. Max. potential after control is 1.314 tons/yr

Uncontrolled PM10 & PM2.5

Assume PM10=10%PM

Assume PM2.5 = 10% of PM10

PM = (1 lb/hr)(8760 hr/yr)= 8760 lb/yr = 4.38tons/yr

PM10 =(4.38)(0.1)= 0.438 ton/yr

PM2.5= (.0034)(.1)= .0438 ton/yr

Opening, Cleaning, Blending							
ES-OCB	opening, cleaning, blending; 15,000 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability	
		CD-RD551601	315			rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551602	511.87			rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551603	393.75			rotary drum filter	NO: <100 tons/yr PM10
		CD-RD553001	315			rotary drum filter	NO: <100 tons/yr PM10
		CD-C553011	0			condenser	NO: <100 tons/yr PM10
		CD-RD553101	119.44			rotary drum filter	NO: <100 tons/yr PM10
		CD-RD553201	328.12			rotary drum filter	NO: <100 tons/yr PM10
		CD-C553211	0			condenser	NO: <100 tons/yr PM10
		CD-RD553301	249.37			rotary drum filter	NO: <100 tons/yr PM10
	CD-RD553501	156.46			rotary drum filter	NO: <100 tons/yr PM10	
	CD-C553511	0			condenser	NO: <100 tons/yr PM10	

Operations consist of opening/unpacking cotton bales, cleaning for impurities and blending different bales for a uniform product

Assumptions:

Fibers assumed to be discharged to the atmosphere for 365 days as the worst case. The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.

Cotton dust levels are less than OSHA limit of 200 ug/m3

PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)

	Equipment ID	CFM	Emitted (ug/hr)	Emitted (lb/hr)	Total PM Max Potential	lbs/yr
	553 101	18200	6184433	0.0136		119.44
	553 201	50000	16990200	0.0375		328.12
	553 301	38000	12912552	0.0285		249.37
	553 501	23842	8101607	0.0179		156.46
	553 601	48000	16310592	0.0360		315.00
	553 602	78000	26504712	0.0584		511.87
	553 603	60000	20388240	0.0449		393.75
	553 001	48000	16310592	0.0360		315.00

Since these units are designed to re-circulate air back to the manufacturing area they are designed to keep cotton dust levels below the OSHA limit of 200 ug/m3.

CARDING

ES-CARD	carding; 9,500 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability	
		CD-RD551101	147			rotary drum filter	NO: <100 tons/yr PM10
		CD-C551111	0			condenser	NO: <100 tons/yr PM10
		CD-RD551102	119			rotary drum filter	NO: <100 tons/yr PM10
		CD-C551112	0			condenser	NO: <100 tons/yr PM10
		CD-RD551103	95			rotary drum filter	NO: <100 tons/yr PM10
		CD-C551113	0			condenser	NO: <100 tons/yr PM10
		CD-C551114	0			condenser	NO: <100 tons/yr PM10
		CD-RD551104	131			rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551105	110			rotary drum filter	NO: <100 tons/yr PM10
		CD-C551115	0			condenser	NO: <100 tons/yr PM10
		CD-RD551106	119			rotary drum filter	NO: <100 tons/yr PM10
		CD-C551116	0			condenser	NO: <100 tons/yr PM10
	CD-RD551801	171			rotary drum filter	NO: <100 tons/yr PM10	

		CD-C551811	0		condenser		NO: <100 tons/yr PM10
		CD-RD551802	142		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551812	0		condenser		NO: <100 tons/yr PM10
		CD-RD551803	197		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551813	0		condenser		NO: <100 tons/yr PM10
		CD-RD551804	142		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551814	0		condenser		NO: <100 tons/yr PM10

Assumptions:

Fibers assumed to be discharged to the atmosphere for 365 days as the worst case. The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.

Cotton dust levels are less than OSHA limit of 200 ug/m3						Total PM Max	
PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)						Potential	
	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	lbs/yr	
	551 101	22400		7611610	0.0168	147.00	
	551 102	18200		6184433	0.0136	119.44	
	551 103	14400		4893178	0.0108	94.50	
	551 104	20000		6796080	0.0150	131.25	
	551 105	16800		5708707	0.0126	110.25	
	551 106	18200		6184433	0.0136	119.44	
	551 801	26000		8834904	0.0195	170.62	
	551 802	21600		7339766	0.0162	141.75	
	551 803	30000		10194120	0.0225	196.87	
	551 804	21600		7339766	0.0162	141.75	

Since these units are designed to re-circulate air back to the manufacturing area they are designed to keep cotton dust levels below the OSHA limit of 200 ug/m3.

Finishing Area

ES-FIN	finishing; 7,488 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description		CAM applicability
		CD-RD552101	197		rotary drum filter		NO: <100 tons/yr PM10
		CD-C552111	0		condenser		NO: <100 tons/yr PM10

Assumptions:

Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.

The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.

Cotton dust levels are less than OSHA limit of 200 ug/m3						Total PM Max	
PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)						Potential	
	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	lbs/yr	
	552101	30000		10194120	0.0225	196.87	

Since these units are designed to re-circulate air back to the manufacturing area they are designed to keep cotton dust levels below the OSHA limit of 200 ug/m3.

Beaming & Slashing

ES-BS	beaming and slashing (6000 pounds per hour input)	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description		CAM applicability
		CD-RD551301	512		rotary drum filter		NO: <100 tons/yr PM10
		CD-RD551302	512		rotary drum filter		NO: <100 tons/yr PM10
		CD-RD551701	276		rotary drum filter		NO: <100 tons/yr PM10

		CD-C551711	0		condenser		NO: <100 tons/yr PM10
		CD-RD551702	276		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551712	0		condenser		NO: <100 tons/yr PM10
		CD-RD551703	276		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551713	0		condenser		NO: <100 tons/yr PM10
		CD-RD551704	276		rotary drum filter		NO: <100 tons/yr PM10
		CD-C551714	0		condenser		NO: <100 tons/yr PM10

Assumptions:

Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.

The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.

Cotton dust levels are less than OSHA limit of 200 ug/m3

PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)

	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	Total PM Max Potential	lbs/yr
	551 301	78000		26504712	0.0584		511.87
	551 302	78000		26504712	0.0584		511.87
	551 701	42000		14271768	0.0315		275.62
	551 702	42000		14271768	0.0315		275.62
	551 703	42000		14271768	0.0315		275.62
	551 704	42000		14271768	0.0315		275.62

Link Spinning

ES-LS	link spinning; 10,000 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description		CAM applicability
		CD-RD550301	368		rotary drum filter		NO: <100 tons/yr PM10
		CD-T550311	included w/ r.drum		T3 disk prefilter		NO: <100 tons/yr PM10
		CD-RD550302	368		rotary drum filter		NO: <100 tons/yr PM10
		CD-T550321	included w/ r.drum		T3 disk prefilter		NO: <100 tons/yr PM10
		CD-RD551401	79		rotary drum filter		NO: <100 tons/yr PM10
		CD-T551411	included w/ r.drum		T3 disk prefilter		NO: <100 tons/yr PM10
		CD-RD551201	119		rotary drum filter		NO: <100 tons/yr PM10
		CD-T551211	included w/ r.drum		T3 disk prefilter		NO: <100 tons/yr PM10
		CD-RD551202	105		rotary drum filter		NO: <100 tons/yr PM10
		CD-T551221	included w/ r.drum		T3 disk prefilter		NO: <100 tons/yr PM10

Assumptions:

Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.

The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.

Cotton dust levels are less than OSHA limit of 200 ug/m3

PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)

	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	Total PM Max Potential	lbs/yr
	550 301	56000		19029024	0.0420		367.50
	550 302	56000		19029024	0.0420		367.50
	551 401	12000		4077648	0.0090		78.75
	551 201	18200		6184433	0.0136		119.44
	551 202	16000		5436864	0.0120		105.00

Winding						
ES-WI	winding; 10,000 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability
		CD-RD550101	368		rotary drum filter	NO: <100 tons/yr PM10
		CD-T550111	included w/ r.drum		T3 disk prefilter	NO: <100 tons/yr PM10
Assumptions:						
Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.						
The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.						
Cotton dust levels are less than OSHA limit of 200 ug/m3						Total PM Max
PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)						Potential
	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	lbs/yr
	550 101	56000		19029024	0.0420	367.50
Warping						
ES-WA	warping; 10,000 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability
		CD-RD551402	119		rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551403	119		rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551404	205		rotary drum filter	NO: <100 tons/yr PM10
		CD-RD551405	119		rotary drum filter	NO: <100 tons/yr PM10
Assumptions:						
Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.						
The condenser just collects the lint, condensing it in a smaller form for handling. There are no emissions from the condenser.						
Cotton dust levels are less than OSHA limit of 200 ug/m3						Total PM Max
PM (ug/hr) = (200 ug/m3)(0.028317 m3/ft3)(60min/hr)(air flow in ft3/min)						Potential
	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	lbs/yr
	551 402	18200		6184433	0.0136	119.44
	551 403	18200		6184433	0.0136	119.44
	551 404	31200		10601885	0.0234	204.75
	551 405	18200		6184433	0.0136	119.44
Starch and PVA SILOS: Maximum Potential emissions						
Source ID	Description	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability
ES-PVA	PVA storage silo; 28,000 pounds per hour input	CD-PVA	745		bagfilter	NO: <100 tons/yr PM10
ES-SS	starch storage silo; 28,000 pounds per hour input	CD-SS	745		bagfilter	NO: <100 tons/yr PM10
Assume that emission factors for lime processing (product transfer and conveying) identified in AP-42, Section 11.17) are similar to starch or lime material handling. Therefore most appropriate emission factors to use for determining emissions from the starch silo loading to be factors from EPA's Compilation of Emission Factors (AP-42), January 1995, Section 11.17.						
AP-42 11.17						

Table 11.17-4 (English Units). EMISSION FACTORS FOR LIME MANUFACTURING						
RAW MATERIAL AND PRODUCT PROCESSING AND HANDLING ^a						
	lbs/ton		PM	EMISSION Factor Rating	PM10	
Product loading, enclosed truck (SCC 3-05-016-26) ^h			0.61	D	ND	
<i>a</i> Factors represent uncontrolled emissions unless otherwise noted. Factors are lb/ton of material processed unless noted. ND = no data. SCC = Source Classification Code.						
<i>b</i> Filterable PM is that PM collected on or before the filter of an EPA Method 5 (or equivalent) sampling train.						
<i>h</i> Reference I2; units are lb/ton of product loaded.						
The plant receives 47,000 lbs per load. Currently starch is delivered twice per month.						
Currently no PVA is used in bulk form.						
For maximum potential assume once per week and 52 wks/yr.						
Will assume that starch or PVA are similar to lime. Loading is from an enclosed truck to an enclosed tank.						
Bagfilter is > 99% efficient						
Uncontrolled PM emissions = .61 X (47000/2000) X 52 = 745.42						
Controlled PM emissions = 745.42 X 0.01 = 7.4542						
Weaving						
ES-WR1	weaving process; 12,000 pounds per hour input	Control Device ID	Total Max. Potential PM Emissions (lbs/yr)		Control Device Description	CAM applicability
		WRF1	31		roll up filters	NO: <100 tons/yr PM10
		WRF2	31		roll up filters	NO: <100 tons/yr PM10
		WRF3	31		roll up filters	NO: <100 tons/yr PM10
		WRF4	31		roll up filters	NO: <100 tons/yr PM10
		WRF5	31		roll up filters	NO: <100 tons/yr PM10
		WRF6	31		roll up filters	NO: <100 tons/yr PM10
		WRF7	31		roll up filters	NO: <100 tons/yr PM10
Assumptions:						
Fibers assumed to be discharged to the atmosphere for 365 days as the worst case.						
Cotton dust levels are less than OSHA limit of 200 ug/m ³					Total PM Max	
PM (ug/hr) = (200 ug/m ³)(0.028317 m ³ /ft ³)(60min/hr)(air flow in ft ³ /min)					Potential	
	Equipment ID	CFM		Emitted (ug/hr)	Emitted (lb/hr)	lbs/yr
	WRF1	4712		1601156	0.0035	30.92
	WRF2	4712		1601156	0.0035	30.92
	WRF3	4712		1601156	0.0035	30.92
	WRF4	4712		1601156	0.0035	30.92
	WRF5	4712		1601156	0.0035	30.92
	WRF6	4712		1601156	0.0035	30.92
	WRF7	4712		1601156	0.0035	30.92

VII. Facility Wide Air Toxics

The Permittee is currently subject to recycled No. 2 fuel oil requirements. The Permittee is allowed to combust on-site generated recycled No. 2 fuel oil as long as it meets the constituent/property allowable levels of unadulterated fossil fuel as listed in the permit. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2007 Actual Emissions (tpy)	2008 Actual Emissions (tpy)
CO	19.41	14.50
NO _x	44.20	38.99
PM ₁₀	8.04	2.78
SO ₂	73.20	0.12
VOC	13.59	4.43
Total HAPs/TAPs	2.55	1.43

IX. Stipulation Review

The facility was last inspected by Eric Hudson of the WSRO on **April 30, 2009**. Based on his visual observations and records review, the "facility appeared to be in compliance with Air Quality standards and regulations at the time of the inspection." Mr. Hudson did note seven items in his inspection report that should be addressed as part of this permit renewal. They are as follows:

1. The facility decided to no longer burn waste No. 2 oil because the maintenance costs of the burners was not worth the infrequent benefit of burning the waste No. 2 oil which previously occurred once every two or three years. Mr. Swift indicated that No. 2 waste oil combustion should be removed from the permit. *No change. Arthur Toompas' email to Eric Hudson on December 6, 2006 states "After talking to everyone here they feel we should retain the ability to burn waste oil but we have no plans to do any burning of waste oil. Apparently it is a 'just in case' for economic reasons."*
2. Arthur Toompas of Cone Denim sent an email, dated December 6, 2006, requesting coal and "mothballed" equipment be removed from the permit at the next permit renewal. Mothballed equipment is discussed above but the permit engineer should have Mr. Gene Swift of Mr. Mike Garlic confirm which pieces of equipment they want removed from the permit. *Agree. Mike Garlic responded to an email request for an equipment list clean up on September 4, 2009. His marked up permit showed the equipment to be eliminated. Those changes have been made.*
3. Condition 2.1 C.2.h (2D .0516) needs to be amended to require the Permittee submit semiannual summary reports (by January 30 and July 30) consistent with other Title V permit conditions. Also, the permit condition requirements should be rearranged to first list all of the No. 6 oil requirements and then all of the coal requirements. *Agree. It appears that the current permit had a "cut-and-paste" error. The shell reporting language has been included in the renewed permit. The remaining monitoring/recordkeeping/reporting requirements (following the removal of all coal combustion requirements) have been placed in the suggested order.*

4. Condition 2.1 E.1 (2D .0515) needs to be amended to require inspection, logbook, and reporting requirements for the afterburner (**ID No. CD-TF2**) installed on tenter frame (**ID No. ES-TF2**). Agree. Monitoring/recordkeeping/reporting requirements have been added to the renewed permit for this control device. Note that this device is noted to only operate on an as needed basis for opacity control. These requirements were included in the particulate standard as requested.
5. Conditions 2.1 E.1 and 2.1 L.1 (2D .0515) requires the Permittee to maintain production records which specify either the process rate (ton/hr) or the types of materials and finishes processed, respectively. The permit engineer should review the conditions for consistency. WSRO recommends that both require records that specify the process rate (ton/hr). *Agree. Updated shell language has been added in both conditions as suggested.*
6. Condition 2.2 A.2 (2D .1806) should be amended to require recordkeeping for the calibration of the dissolved oxygen (DO) monitor. *Agree. Recordkeeping language has been included in the renewed permit.*
7. Permit conditions for 2D .0521 monitoring are not consistent. Some conditions indicate if visible emissions are above normal the Permittee shall either take appropriate action to correct emissions within the monitoring period or demonstrate the opacity is below the limit. Some conditions do not allow the Permittee to take appropriate action to correct emissions. The permit conditions should be consistent. *Agree. All permit conditions were reviewed and modified to make consistent with current shell language.*

Eric Hudson of the WSRO had the following comments on the draft renewed permit as sent on **December 21, 2009**:

1. Permit Review/Header/Application Data – indicates the existing permit was issued on **August 26, 2002**. It should indicate **May 1, 2006**. *Agree, change has been made.*
2. Permit Review/Section III – gives the history of permits issued. Permit **03470T15** issued on **September 4, 2002** was issued because of an administrative amendment to fix a typo. *Agree, this note has been added.*
3. Permit Review/Section III – **September 4, 2009** regarding wastewater treatment. Cone asked for permission to close the polishing pond. You indicated this action is outside the scope of permit renewal. Food for thought – the original plan submitted to DAQ for controlling odors, which was prepared by a consultant P.E., advised to close the polishing pond because it is not necessary. *No change. As indicated above, the original and approved plan represented a Maximum Feasible Control Technology (MFCT) plan. That plan cannot be modified without permit modification as part of this renewal.*
4. Permit Review/CAM – equipment table comment regarding equipment not emitting to atmosphere. I think an asterisk and a note will suffice. *Agree, asterisk note has been included in permit review.*
5. Permit Review/CAM – information provided by Cone regarding potential emissions and CAM applicability. At first I thought the calculated uncontrolled potential emissions (lbs/yr) seemed too low but after review I am in general agreement with the methodology. What do you think? If potential emissions are below 5 tons before control, does the equipment need to be permitted? *No change. The draft calculations represent the potential PM10 portions of the waste stream only. The Permittee estimates (as noted) that only 2% of total emissions would be considered less than PM125, therefore, potential emissions of particulate could be above the 5 ton per year exemption level.*
6. Permit/Insignificant Activity List – IES-FP, diesel fire pumps. Please list the number and size of fire pumps. One is rated at 375 HP and 200 kW and the other is rated at 340 HP. *Agree, this change has been made.*

7. Permit/Equipment Table – CD-PVA and CD-SS are bagfilters for silos. Please list the size of each bagfilter. I reviewed the file and according to the permit application, the PVA bagfilter has a filter area of 155 square feet. The starch silo bagfilter has a filter area of 261.5 square feet. *Agree, this change has been made.*
8. Permit condition 2.1 A.4 regarding recycled No. 2 fuel oil. The facility actually generates the recycled oil. I believe it is lubricating oil. Therefore condition 2.1 A.4.d.ii. needs to be reworded. *Agree, permit shell modifications have been removed from draft renewed permit and reverts to current wording in T18.*
9. Permit condition 2.1 A.5.b requires quarterly reporting for PSD avoidance. Can we change this to semiannual reporting consistent to other permit conditions? *Agree, change has been made.*
10. Permit condition 2.1 C.1.d should also require an annual internal inspection for the afterburner CD-TF2. *Agree, change has been made.*

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. The State of Virginia and the Forsyth County Local Program are affected states.

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.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

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