

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Catawba
NC Facility ID: 1800493
Inspector's Name: Bruce Ingle
Date of Last Inspection: 11/19/2004
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Synthetics Finishing Longview Facility Address: Synthetics Finishing Longview 515 23rd Street SW Longview, NC 28603 SIC: 2262 / Finishing Plants, Synthetics NAICS: 313311 / Broadwoven Fabric Finishing Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 2D .0958, 2D .0614 (CAM), 2D .1111 (MACT Subpart OOOO) NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 2Q .0705 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1800493.04A Date Received: 06/25/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08768/T00 Existing Permit Issue Date: 04/03/2001 Existing Permit Expiration Date: 03/31/2005
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Review Engineer: Ed Martin Review Engineer's Signature: _____ Date: 08/03/2005 DRFAT FOR PUBLIC NOTICE		Comments / Recommendations: Issue 08768/T01 Permit Issue Date: Permit Expiration Date:	

I. Purpose of Application:

This permit revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The renewal application was received on June 25, 2004, or at least nine months prior to the expiration date. Therefore, the existing permit will not expire until the renewal permit has been issued or denied. The initial application did not include any information related to applicability of CAM. A CAM Plan was requested on January 28, 2005. The plan was received July 1, 2005 for the Stain Repellant. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Permit Changes:

The following changes were made to the Synthetics Finishing Air Quality Permit No. 08768T01:

Page Number	Condition Number	Change
Part I		
Cover	Permit Information	Modified to reflect current permit number, issue and effective date, and associated application information.
3	Permitted Emission Sources table	Added “(MACT Subpart OOOO)” for ID Nos. ES1, ES2, ES3, ES4 and ES5. Revised heat inputs for boilers B1 and B2.
4	Part I, Section 2.1 A regulation table	Replaced 2D .0518 with 2D .0958. Changed PSD avoidance regulation from 15A NCAC 2Q .0530 to 15A NCAC 2Q .0317. Added 2D .1111 MACT. Added 2Q .0705.
5 7 9	Part I, Section 2.1 A.3.c Part I, Section 2.1 B.3.c Part I, Section 2.1 C.2.c	Removed the sentence: <i>The Permittee shall establish “normal” for the source in the first 30 days following permit issuance.</i> “Normal” has already been established for visible emissions for these sources. Added the sentence: <i>The Permittee shall be allowed three (3) days of absent observations per semi-annual period.</i>
5	Part I, Section 2.1 A.3	Added 2D .1111 MACT requirements.
5	Part I, Section 2.1 A.4	Added 2Q .0705 requirements.
6	Part I, Section 2.1 B regulation table	Replaced 2D .0518 with 2D .0958. Changed PSD avoidance regulation from 15A NCAC 2Q .0530 to 15A NCAC 2Q .0317. Added 2D .1111 MACT. Added 2Q .0705.
7	Part I, Section 2.1 B.4	Added 2D .1111 MACT requirements.
7	Part I, Section 2.1 B.5	Added 2Q .0705 requirements.
8	Part I, Section 2.1 C regulation table	Replaced 2D .0518 with 2D .0958 and 2D .0958(e). Changed PSD avoidance regulation from 15A NCAC 2Q .0530 to 15A NCAC 2Q .0317. Added 2D .0614 CAM. Added 2D .1111 MACT. Added 2Q .0705.
9	Part I, Section 2.1 C.3	Added 2D .0614 CAM requirements.
10	Part I, Section 2.1 C.4	Added 2D .1111 MACT requirements.
10	Part I, Section 2.1 C.5	Added 2Q .0705 requirements.
11	Part I, Section 2.2 A regulation table	Replaced 2D .0518 with 2D .0958 and 2D .0958(e). Changed PSD avoidance regulation from 15A NCAC 2Q .0530 to 15A NCAC 2Q .0317.
11-14	Part I, Section 2.2 A.1 Part I, Section 2.2 A.2	Replaced 2D .0518 requirements with 2D .0958 and 2D .0958(e) requirements.
11	Part I, Section 2.2 A.2	Changed PSD avoidance regulation from 15A NCAC 2Q .0530 to 15A NCAC 2Q .0317.
16-23	Part I, Section 3	Added new set of General Conditions.

The Permit was converted from WordPerfect to MS Word at this time.

III. Application Chronology:

The initial application did not include any information related to applicability of CAM or MACT. During renewal of the Title V application, the applicability of CAM is to be addressed. The Stain Repellant Coater (ID No. ES5) has a control device (two dual bed carbon adsorption systems, ID Nos. CD1 and CD2) and appeared to have potential pre-control VOC emissions greater than 100 tons per year, which would meet the criteria for CAM. This facility is very similar to the Synthetics Finishing Hickory facility for which a renewal application was received on April 26, 2004, and for which the permit was issued on July 8, 2005. Applicability of CAM and MACT was previously discussed with Mr. Jim Clanton (the Responsible Official and technical contact for both facilities) for the Hickory facility (see review for Hickory Permit No. 07601T05). A CAM Plan was requested (see letter to Mr. Jim Clanton from Michael Benson dated January 28, 2005). The CAM Plan was received July 1, 2005.

Additional application chronology is detailed on the attached ATS Comprehensive Application Report.

IV. Facility Description

Synthetic Finishing, Longview Plant, is a textile finishing facility which applies latex (backing) and a stain repellent coatings to fabrics. The facility consists of two steam heated tenter frames (ID Nos. ES1 and ES4) and two natural gas/LPG-fired tenter frames (ID Nos. ES2 and ES3), all installed in the early to mid 1970's; a stain repellent coater (ID No. ES5) with two dual bed carbon adsorption systems (ID Nos. CD1 and CD2) installed in 1978 or 1979; and two natural gas/LPG/ No. 2 fuel oil-fired boilers (ID Nos. B1 and B2).

V. Statement of Compliance

Based on the most recent inspection for this facility on November 19, 2004, by Bruce Ingle, the facility appeared to be in compliance with the applicable air quality regulations.

VI. Summary of Changes to Emission Sources and Control Devices

There are no changes to emission sources or control devices.

VII. Emission and Regulatory Evaluation

New Regulations

The following new regulations were added for the Tenter Frames (ID Nos. ES1, ES2, ES3 and ES4):

1. 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR Part 63 Subpart OOOO: National Emissions Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles)

Existing affected sources subject to MACT Subpart OOOO must be in compliance by May 30, 2006, which is the compliance date (see Section III.D.1 of the preamble and 63.4283(b) of the rule). *Initial Notification* was due June 2, 2004, as per Section III.F.1 of the preamble and 63.4310(b) of the rule. The compliance date begins the "initial compliance period" during which the initial compliance demonstration described in 63.4320, 63.4330, 63.4340, and 63.4350 must be conducted. The end of the initial compliance period varies according to which option is used. The *Notification of Compliance Status* (63.4310(c)) must be submitted 30 days after the end of the initial compliance period.

At this time the MACT condition in the permit will contain the initial notification requirements only. This condition will be expanded later to reflect details of how the facility will comply with the MACT after the option(s) for compliance (see 63.4291) is determined and the *Notification of Compliance Status* is submitted and other relevant information is known.

2. 2Q .0705 EXISTING FACILITIES AND SIC CALLS (State Enforceable Only)

The following new regulations were added for the Stain Repellant Coater (ID No. ES5):

1. 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR Part 63 Subpart OOOO: National Emissions Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles)
2. 2D .0614: COMPLIANCE ASSURANCE MONITORING (40 CFR 64)
3. 2Q .0705 EXISTING FACILITIES AND SIC CALLS (State Enforceable Only)

Change to Existing Regulations

The four Tenter Frames for Latex Backing Application (ID Nos. ES1, ES2, ES3 and ES4) and the Stain Repellant Coater (ID No. ES5) had been subject to 2D .0518 MISCELLANEOUS VOLATILE ORGANIC COMPOUND EMISSIONS. This is now changed to 2D .0958. Since the Stain Repellant Coater is a source on which a control device (two dual bed carbon adsorbers) has been installed to comply with 15A NCAC 2D .0518(d), the control device must be maintained and operated unless the Director determines that the removal of the control device shall not cause or contribute to a violation of the ozone ambient air quality standard.

Also, the applicable regulation for PSD avoidance for these sources was changed to 2Q .0317 rather than 2D .0530.

Streamlining of Permit Monitoring Requirements

Certain monitoring requirements for 2D .0614 (CAM) and 2D .0958(e) overlap and are redundant. Therefore, streamlining has been incorporated in accordance with Part 70.6(a)(3)(A) provisions to cross-reference those requirements.

VIII. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

Section 2.3 contains the permit shield for the following nonapplicable requirement per 15A NCAC 2Q .0512(a)(1)(B):

The New Source Performance Standards for Polymeric Coating of Supporting Substrates (40 CFR 60, Subpart VVV) are not applicable to Tenter Frames (**ID Nos. ES1, ES2, ES3, and ES4**) or to the Stain Repellant Coater (**ID No. ES5**) as they were constructed prior to April 30, 1987.

IX. Public Notice and EPA Review

This renewal permit is being processed under 2Q .0513 which requires public notice. Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit will 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 draft (proposed) permit, review and public notice will be sent to EPA for their 45-day review, to persons on the Title V mailing list, to the Mooresville Regional Office at the time of public notice (parallel review). In addition, at the time of public notice, notice of the draft permit and opportunity for participation will also be given to the affected states, as specified by 15A NCAC 2Q .0503(1) and 40 CFR 70.8(b).

X. Other Requirements

PE Seal

A professional engineer's seal was not required for this renewal since there are no new control devices or changes to any existing control devices.

Zoning

A consistency determination was not required for this renewal since the facility is not being expanded.

Fee Classification

The facility fee classification before and after this modification will remain as "Title V".

XI. Recommendations

later, after public notice