

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2008**

**Region:** Winston-Salem Regional Office  
**County:** Alamance  
**NC Facility ID:** 0100160  
**Inspector's Name:** Steve Moser  
**Date of Last Inspection:** 10/03/2007  
**Compliance Code:** 4/In Compliance – Certification

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> ITG/Burlington Industries LLC -Burlington Finishing Plant  <b>Facility Address:</b> ITG/Burlington Industries LLC -Burlington Finishing Plant 906 Anthony Street Burlington, NC 27215  <b>SIC:</b> 2262 / Finishing Plants, Synthetics <b>NAICS:</b> 313311 / Broadwoven Fabric Finishing 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> 0100160.08A <b>Date Received:</b> 07/21/2008 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 00148/T21 <b>Existing Permit Issue Date:</b> 10/11/2007 <b>Existing Permit Expiration Date:</b> 04/30/2009
Jeff Overman, P.E. Plant Engineer (336) 228-2457 P O Box 691 Burlington NC, 27216+0691	Robert Fariole Director of Engineering (336) 379-4573 804 Green Valley Road Greensboro NC, 27408	Mike Garlick Corporate Environmental Engineer (336) 379-2941 804 Green Valley Road Greensboro NC, 27408	
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2008</b>		<b>Comments / Recommendations:</b> Issue 00148/T22 <b>Permit Issue Date:</b> <b>date, 2008</b> <b>Permit Expiration Date:</b> <b>date, 2013</b>	

**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 (**00148T21**) was issued on **October 11, 2007**, and is currently scheduled to expire on **April 30, 2009**. The renewal application was received on **July 21, 2008**, 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.

In addition to the renewal of the Title V air permit, the Permittee has requested that the identification number for an existing tenter frame be modified to reflect current facility recognition of the equipment. [ES004-3 to ES004-8]

**II. Facility Description**

The facility finishes mattress ticking, upholstery, and drapery material.

### III. History/Background/Application Chronology

**July 21, 2008** – Permit application **0100160.08A** was received for the renewal of the existing Title V air permit.

**August 26, 2008** – Received WSRO’s Comments and Recommendations on the air permit application.

**August 27, 2008** – DRAFT permit sent to Permittee, Regional Office, Title V Coordinator for comment prior to public notice and EPA review. The Permittee responded in a September 12, 2008 email that they had no comments on the DRAFT permit. The WSRO responded in a September 26, 2008 email that they had no substantive comments on the DRAFT permit.

**Date, 2008** – DRAFT sent to 30-day public notice and 45-day EPA review prior to issuance.

### 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	-removed control device description per WSRO inspection report
Cover	-	-amended all dates and permit revision numbers -amended facility mailing address
TOC	-	-removed reference to Part II
All	Header	-amended permit revision number
3	Equipment Table	-matched equipment descriptions with ESM entries -added specific MACT Subpart notation -amended ID number for tenter frame <b>ES004-3</b> to <b>ES004-8</b> per Permittee request (Note. This was changed throughout permit)
4	2.1 A (table) 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.2.a 2.1 A.2.b	-removed reference to MACT Subpart DDDDD -added ID numbers -corrected testing regulation citation -added ID numbers -added ID numbers -corrected testing regulation citation
5	2.1 A.2.c 2.1 A.2.d 2.1 A.2.f 2.1 A.3.a 2.1 A.3.b 2.1 A.3.c	-added ID numbers -added ID numbers -added “no reporting” language for natural gas combustion -added ID numbers -corrected testing regulation citation -added ID numbers
5-6	2.1 A.3.d	-added ID numbers -corrected testing regulation citation
6	2.1 A.3.f	-added “no reporting” language for natural gas combustion

Page	Section	Description
7	2.1 B.1.a 2.1 B.1.b 2.1 B.1.c 2.1 B.1.d 2.1 B.2.a 2.1 B.2.b 2.1 B.2.c	-added ID numbers -corrected testing regulation citation -updated shell language -added “no reporting” language for uncontrolled sources -added ID numbers -corrected testing regulation citation -added ID numbers
8	2.1 B.3.c 2.1 B.3.d	-corrected testing regulation citation -corrected testing regulation citation
9	2.1 C.1.a 2.1 C.1.b	-added ID numbers -corrected testing regulation citation
10	2.1 C.1.c 2.1 C.1.e 2.1 C.2.a 2.1 C.2.b	-added ID numbers -added ID numbers -added ID numbers -corrected testing regulation citation
10-11	2.1 C.2.c	-added ID numbers -corrected testing regulation citation
11	2.1 D (table)	-added table of applicable regulations
13	2.1 E.1.a 2.1 E.1.b 2.1 E.1.d	-added ID numbers -corrected testing regulation citation -added “no reporting” language for uncontrolled source
14	2.1 E.2.b 2.1 E.2.c	-corrected testing regulation citation -added ID numbers -corrected testing regulation citation
16	2.2 A.1.e 2.2 B.1	-shell language update -corrected rule citation
19	2.3	-added Section for “Permit Shield for Nonapplicable Requirements”
20-29	General Conditions	-updated shell conditions (v2.22.1)
-	Part II	-removed Part II

The following table represents the modifications/additions/deletions to ESM:

Current Language	Proposed Change
One natural gas/propane-fired tenter frame (6.0 million Btu per hour heat input; <b>ID No. ES004-3</b> )	One natural gas/propane-fired tenter frame (6.0 million Btu per hour maximum heat input capacity; <b>ID No. ES004-8</b> )  Change ID number per Permittee request (also noted in WSRO inspection report)
Kalin brush system ( <b>ID No. I-KA</b> )	Removed from insignificant activities list per WSRO request and end-dated source. Source as operated does not vent to outside atmosphere.

## 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 Toxic Air Pollutants  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart M)  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .1111, Maximum Achievable Control Technology and 15A NCAC 2D .0530, Prevention of Significant Deterioration)  
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for the existing sources will not be included in this document.

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

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

**NESHAPS/MACT** – The facility is subject to the Maximum Achievable Control Technology Standards for Perchloroethylene Dry Cleaners. For source (**ID No. ES008**), the Permittee shall meet the operating requirements in 40 CFR 63.322 for both the source and its associated control device (**ID No. CD-08**). The Permittee shall also comply with the applicable testing and monitoring requirements of 40 CFR 63.323. In addition, the MACT requires recordkeeping and reporting. This permit renewal does not affect this status.

The facility is also subject to a facility-wide MACT Avoidance condition that limits hazardous air pollutants to less than major source thresholds (10/25 tons per year). To ensure compliance, the Permittee must maintain production records of monthly material usage and report these summaries semi-annually. This permit renewal does not affect this status.

**PSD** – The facility is a grandfathered major stationary source with the exception of tenter frame (**ID No. ES004-7**) which is limited to less than 39 tons of VOCs per consecutive 12-month period. To ensure compliance, the Permittee shall make monthly VOC calculations at the end of each month by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The Permittee shall record these calculations and submit semiannual reports summarizing the totals. 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 table identifies all emission source/control device relationships:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES005	One sodium sulfate storage silo with a 20 ton per hour filling rate capacity	CD-1	One bagfilter (172 square feet of filter area)
ES008 (MACT, Subpart M)	One dry-to-dry perchloroethylene dry cleaner	CD-08	One refrigerated condenser

Sodium sulfate storage silo (ID No. ES005) – This source is required to comply with both the particulate emission limit established by 15A NCAC 2D .0515 and the opacity limit established by 15A NCAC 2D .0521. According to the October 3, 2007 facility inspection report, Steve Moser of the WSRO noted that:

*“The sodium sulfate silo was not being filled at the time of the inspection... Without observation or testing, compliance with 15A NCAC 2D .0515 cannot be absolutely determined. **The silo should perform in a similar manner to a cement silo, and USEPA AP-42 emission factors predict these silos will comply with 15A NCAC 2D .0515 in most cases even without control.** Therefore, compliance with the above regulations will be expected. Mr. Overman said the facility had begun receiving the sodium sulfate in sacks now instead of in bulk, as the quality seemed more consistent. The silo has not been filled since August 2006.”*

This is further supported by Jeff Twisdale’s permit renewal review for this same facility (see **May 27, 2004 00148T16 Permit Review**). This Document calculates potential pre-controlled emissions from this source at less than major source thresholds; therefore, CAM does not apply to this control device.

Dry-to-Dry Perchloroethylene dry cleaner (ID No. ES008) – This source is only required to comply with the National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities (40 CFR 63, Subpart M). As such, the source is subject to the exemptions from CAM requirements provided in 40 CFR 64.2(b)(1)(i) – emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act (Note. This specific MACT was proposed on December 9, 1991). Therefore, CAM does not apply to this control device.

In order to clarify this position, the following “Non-applicable requirements” language has been included in the renewed permit as Section 2.3:

### **2.3- Permit Shield for Nonapplicable Requirements**

- A. One sodium sulfate storage silo (ID No. ES005) and associated bagfilter (ID No. CD-1)  
Dry-to-dry perchloroethylene dry cleaner (ID No. ES008) and associated refrigerated condenser (ID No. CD-08)**

*The following table provides a summary of limits and standards for the emission source(s) described above:*

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
-	Compliance Assurance Monitoring	15A NCAC 2D .0614

- 1. 15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING** - Pursuant to 15A NCAC 2Q .0512(a)(1)(B) "Permit Shield and Application Shield," with the issuance of this permit (00148T22), the following stipulations of nonapplicability have been made:
- a. permitted source (ID No. ES005) has been determined to not meet all relevant exemption requirements of 40 CFR 64.2(a)(1) through (3) because the source's potential pre-control device emissions of each applicable regulated air pollutant do not equal or exceed the major source thresholds for that pollutant [40 CFR 64.2(a)(3)]; and
  - b. permitted source (ID No. ES008) has been determined to qualify for an exemption from requirements of 40 CFR Part 64 as being subject to an emission limitation or standard proposed by EPA after November 15, 1990 pursuant to Section 112 of the Clean Air Act [40 CFR 64.2(b)(1)(i)].
- Therefore, CAM has been determined to not be applicable to these specific sources or their associated control devices as described above.

**VII. Facility Wide Air Toxics**

The facility is subject to modeled emission rates per 15A NCAC 2D .1100 for acetic acid, ammonia, and formaldehyde from a selection of its tenter frames. The permit specifies monitoring, recordkeeping and reporting requirements to ensure compliance. This permit renewal does not affect this status.

The facility has also made a demonstration that facility-wide actual emissions of acrylonitrile, 1,4-dioxane, ethylene oxide, and styrene do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711. A permit to emit any of the below listed TAPs shall be required for this plant if actual emissions from all sources will become greater than the corresponding TPERs. This permit renewal does not affect this status.

**VIII. Facility Emissions Review**

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	8.13	11.67
NO <sub>x</sub>	26.10	35.22
PM <sub>10</sub>	6.00	6.75
SO <sub>2</sub>	17.95	0.09
VOC	7.26	6.28
Total HAP/TAP	0.94	0.79

## **IX. Stipulation Review**

Steve Moser of the WSRO identified the following items for consideration during the renewal process:

1. The Kalin brush system (**ID No. I-KA**) should be removed from the insignificant list, as it does not vent to the outside atmosphere. *Agree, change will be made.*
2. Confirm that all appropriate equipment that is associated with Burlington Manufacturing – Pioneer Plant (**0100298**) has been removed from the renewed permit. *Agree, change will be made.*

In his **October 3, 2007** inspection report, Steve Moser commented that “based on the inspection and date reviewed, the facility appeared to be in compliance.”

## **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 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 areas within 50 miles of the 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.

WSRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to notice and issuance (See History Section of this Document for a listing of dates).

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