

**AIR PERMIT REVIEW**

DRAFT

APPLICANT Burlington Industries	SITE LOCATION Raeford	COUNTY Hoke
CONTACT Mike Garlick	PHONE 336-379-2941	
APPLICATION FOR: Title V Renewal		Existing P/N 0242T10
APP. NO. 4700001.02B	REVIEWER Michael Brandon	SIGNATURE DATE March 13, 2003
RECOMMENDATION AND COMMENT Issue Permit 0242T11		FEE CLASS Title V

**1. Purpose of Application:**

This is a renewal of an a Title V permit pursuant to 2Q .0503. The existing Title V permit (0242T10) was issued on September 24, 1998 and is currently scheduled to expire on August 31, 2003. The renewal application was received on November 20, 2002, nine months, 11 days prior to the expiration. Therefore; the existing permit shall not expire and all terms and conditions of the existing permit shall remain in effect until the renewal has been issued or denied.

**2. Application Chronology:**

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

**3. Permit modifications and changes**

An insignificant activities list was created to include sources whose emissions are less than five tons per year of criteria pollutants and 1000 pounds of hazardous air pollutants in accordance with 15A NCAC 2Q .0508 (and associated definitions per 15A NCAC 2Q .0503).

The laboratory was added as a significant source of HAP emissions (trichloroethylene) and is exempt from 15A NCAC 2D .0958 as trichloroethylene is used for analytical purposes and its emissions are less than 800 pounds per month per 15 A NCAC 2D .0902(h)(7).

**4. Regulatory Review:**

The facility is subject to the following regulations:

- 15A NCAC 2D .0503 "Particulate from Fuel Burning heat Exchangers"
- 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 2D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 2D .0521 "Control Of Visible Emissions"
- 15A NCAC 2D .0530 "PSD avoidance Condition"
- 15A NCAC 2D .1111 "MACT Avoidance Condition"

No regulatory review is required at this time since there are no new applicable regulations for this permit renewal. However, the applicant did request that a MACT avoidance condition be placed in the permit in anticipation of the promulgation of 40 CFR 63, Subpart OOOO entitled "National Emission Standards for Fabric Printing Coating and Dying.

**5. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM**

NSPS

No New Source Performance Standards Apply to this facility.

NESHAP

Subpart OOOO for fabric coating and dying does not apply to this facility as it is not a major source of hazardous air pollutants.

PSD

The facility is required to maintain sulfur dioxide emissions below 250 tons per year to remain a minor source for PSD applicability determinations.

Attainment Status

This facility is located in Hoke County which is attainment according to 2D.0902.

112(r)

This facility is not subject to 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.

CAM

Particulate emissions from the coal-fired boiler are regulated under 15A NCAC 2D .0503 and the multiclones are used to comply with this regulation. Uncontrolled emissions of PM are 461 tons per year; however, PM is a surrogate for the pollutant PM-10 whose uncontrolled emission are 92 tons per year. Therefore, a CAM plan is not required.

**6. Facility Wide Toxic Air Pollutants**

The facility has not triggered a toxic air pollutant review.

**7. Facility Compliance Status/Statement of Compliance:**

The Fayetteville Regional Office has reported the facility to be in compliance with all applicable regulations and permit requirements as of the last inspection conducted in June 2002 . The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit

issuance and will continue to comply with these requirements. The applicant has also certified that facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

**8. Facility Emissions Review:**

There is no change in emissions for this renewal.

**9. Stipulation Review:**

All conditions now have the caveat that the facility will be out of compliance with the underlying standards if the monitoring and recordkeeping is not conducted in accordance with permit conditions.

A MACT synthetic minor condition was added per the applicant's request. Facility wide emissions must be less than 25 tons per year for total HAPs and 10 tons per year for any individual HAP.

Three absent days are allowed for daily visible emissions observations.

Reporting periods were made consistent with present permit shell requirements.

General conditions were updated.

**10. Public Notice/EPA Review/Affect State 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 15A NCAC .0522, a notice of the draft Title V Permit shall be provided to each affected State at or before the time

notice is provided to the public under 15A NCAC 2Q .0521 above. There are no affected States for this facility.

**11. Conclusions, Comments, and Recommendations:**

The RCO recommends issuance of permit 0242T11.

The FRO recommends issuance of permit 0242T11.