

## TITLE V AIR PERMIT MODIFICATION APPLICATION REVIEW

<b>APPLICANT:</b> Bloomsburg Mills Inc.	<b>SITE LOCATION:</b> Monroe	<b>COUNTY:</b> Union
<b>TECHNICAL CONTACT:</b> James Little	<b>PHONE:</b> (704) 289-2536	<b>RESPONSIBLE OFFICIAL:</b> William Parker
		<b>TITLE:</b> Vice President
<b>REVIEW ENGINEER:</b> Wallace Pitts	<b>SIGNATURE:</b>	<b>DATE:</b> October 6, 2004
<b>REGIONAL CONTACT:</b> William Bass	<b>REGIONAL OFFICE:</b> Mooresville	<b>SIC :CODE:</b> 2269
<b>APPLICATION NUMBER:</b> 9000052.04A	<b>EXISTING PERMIT NUMBER:</b> 03001T11	<b>NEW PERMIT NUMBER:</b> 03001T12

### I. Introduction/Purpose of Application

The purpose of this significant Title V permit modification is to add avoidance conditions for 15A NCAC 2D .1111 “Maximum Achievable Control Technology”. Otherwise, the facility would be subject to 40 CFR 63 Subpart OOOO “National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles”, with a compliance date of May 29, 2006. The permittee provided information on the monthly individual HAPs and total HAPs consumed for the period February 2003 through June 2003, and the 12-month totals (moving) for the period February 2002 through June 2004. The highest 12-month total HAPs consumed was 5.89 tons (12-month period ending February 2003). Since this value is below the 10 tons/year of any individual HAP or 25 tons per year on all HAPs criteria for a source to be considered a major HAPs source, and, hence, subject to 15A NCAC 2D .1111, the Permittee requested that avoidance conditions be added to the permit so that the facility would not become subject to this requirement.

The following table summarizes the changes made to the existing permit.

Old Page	New Page	Section or condition	Change
~	All	All	Re-formatted for MS Word.
1	1		Changed effective date, permit number. Also changed expiration date from March 31, 2005 to March 31, 2008. When the permit was renewed, an administrative error was made, and the correct expiration date should have been March 31, 2008. Note that the renewal application date is June 30, 2007.
6	3	~	Removed references to 502(b)(10) for emission source MW-3. This should have been done during permit renewal.
7 - 18	4 -16	All	Updated 15A NCAC 2D .0503, .0515, .0516, .0521, .0958 to new conditions. Note that requirements for re-determining “normal” for opacity under 2D .0521 have also been added. In addition, compliance statements have been added to monitoring and recordkeeping.
8 - 18	5 -16	All reporting requirements	Updated reporting language to have reports postmarked on or before January 30 and July 30 instead of February 1 and August 1.
16	14	2.2.A.1	Added cite to 15A NCAC 2Q .0317(a)(1) for avoidance conditions for 15A NCAC 2D .0530.
16	14	2.2.A.1.e	Changed reporting from quarterly to semi-annual.

~	16	2.2.C	Added 2.2.C avoidance conditions for 15A NCAC 2D .1111.
19 - 27	17- 24	3	Updated general conditions

**II. Background Information**

**November 10, 1998** – Initial Title V permit issued (003001T10).

**April 11, 2003** – Title V permit renewed (03001T11).

**September 2, 2004** – Permit modification application received.

**September 20, 2004** – Regional Permit Reviewer recommends issuance of Permit.

**III. Facility Description**

The facility operates as a textile mill specializing in the textile knitting, dyeing, finishing, and garment cutting of textile fabrics.

**IV. Statement of Compliance**

The facility was inspected on November 5, 2003 and appeared to be in compliance.

**VI. Emission Source-by-Source Evaluation (sources pertaining to application only)**

There will be no equipment changes or modifications associated with these permit revisions.

Regulatory analysis

a. 15A NCAC 2D.1111 “Maximum Achievable Control Technology”

The permit was modified to add avoidance conditions for this regulation.

**VII. Multiple Emission Source Limits:**

A facility wide avoidance condition for 15A NCAC 2D .1111 was added to the permit.

**VIII. MACT Applicability Requirements**

The facility requested that avoidance conditions be placed in the permit to avoid the applicability of MACT.

**IX. Permit Shield (including non-applicable requirements).**

N/A

**X. Insignificant Activities**

The facility has several insignificant activities. These are listed in the permit.

## **XI. Public Notice**

Pursuant to 2Q .0521, a notice of the draft Title V Permit was placed in a newspaper of general circulation in the area where the facility is located. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant was provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina and Mecklenburg County, NC are considered affected States for this facility.

## **XII. Recommendations**

The permit is being issued as a Title V Significant modification under 15A NCAC 2Q .0516, and was processed under 15A NCAC 2Q .0501(c)(1). MRO recommends issuance of the permit and **does** request a DRAFT permit prior to issuance.