

## AIR PERMIT REVIEW

APPLICANT Burlington Industries, LLC		SITE LOCATION Burlington	COUNTY Alamance
CONTACT Mr. Mike Garlick Environmental Engineering Manager		PHONE (336) 379-4953	
APPLICATION FOR Renewal/ Permit Consolidation/Ownership Change		Existing P/N 00148T15	
APP No. 0100160.02A	REVIEWER Jeff Twisdale	SIGNATURE	DATE February 5, 2004
RECOMMENDATION and COMMENT Issue Permit # 00148T16			FEE CLASS Title V

### 1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (00148T15) was issued on June 5, 2003 and is currently scheduled to expire on May 31, 2004. The renewal application was received on February 11, 2002 (at least nine months prior to the expiration date) and was considered complete after receipt of ownership change (Incorporated to Limited Liability Corporation (LLC)) request on December 9, 2003. 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. Also, this modification combines the existing Title V permit (00148T15) for the BHF Plant with the existing prohibitory small permit (07193R11) for the Burlington Industries, Inc. - Pioneer Plant since both plants have the same common ownership, same Standard Industrial Classification (SIC) code and property that is contiguous and/or adjacent. The two permits mentioned above will be consolidated into one Title V permit (00148T16) for Burlington Industries, LLC - BHF and Pioneer Plants.

### 2. Facility Description

Burlington Industries, LLC (Burlington) consists of two plants: Burlington House Finishing (BHF) Plant finishes mattress ticking, upholstery, and drapery material; Pioneer Plant dyes and finishes polyester yarn and transfers the yarn from bobbins to section beams. This facility is a Title V facility since potential nitrogen dioxide, sulfur dioxide and volatile organic compound (VOC) emissions are greater than 100 tpy.

### 3. Application Chronology

**February 11, 2002** - Air permit application for renewal was received by the Division of Air Quality (DAQ), Winston-Salem Regional Office (WSRO).

**December 9, 2003** - Air permit application for ownership change was received by the DAQ, WSRO. The permit application was considered complete as of December 9, 2003.

**January 15, 2004** - Phoned Mike Garlick, Burlington inquiring about any recent changes at the facility.

**January 20, 2004** - E-mailed the draft permit to Steve Moser and Jodi Howard, both of WSRO and to Mike Garlick, Burlington.

**January 21, 2004** - Phoned Steve Moser, Jodi Howard and Jalal Adouli, all of WSRO, inquiring about any recent changes and any compliance issues at the facility.

**January 22, 2004** - Received e-mail from Jodi Howard, WSRO with comments on the draft permit.

**February 5, 2004** - Received e-mail from Steve Moser, WSRO regarding approval of the draft permit.

### 4. Permit Modification/Changes

Pursuant to 2Q .0516, the following significant modification (actually Title I (Section 112)) was made to the initial Title V permit (00148T13) by utilizing the Part II Construction Section of the Air Quality Permit:

- Dry-to-dry cleaner (ID No. ES008) was added under permit revision (00148T14) issued on 11/13/98.

Pursuant to 2Q .0523, the following Section 502(b)(10) change was made to the revised Title V permit (00148T14) by utilizing the Part II Construction Section of the Air Quality Permit:

- Tenter frame (ID No. ES004-7) was added under permit revision (00148T15) issued on 06/05/03.

The sources and associated regulatory requirements (not including the Exclusionary Rule Requirements) from the existing prohibitory small permit (07193R11) were incorporated into the existing Title V permit.

The following table represents the changes to the existing Title V permit:

Old Page No.	New Page No.	Condition No.	Change
Page 2	Page 2	Table of Contents	Removed Part II Sections 1, 2 & 3 since the tenter frame (ID No. ES004-7) has been installed
Pages 12-20	Pages 15-22	Part I General Conditions	Updated the General Conditions with the latest version available

Old Page No.	New Page No.	Condition No.	Change
Pages 21-22	NA	Part II Sections 1, 2 & 3	Removed Part II Sections 1, 2, & 3 since the tenter frame (ID No. ES004-7) has been installed

## 5. Regulatory Review

The facility is subject to the following regulations:

- 2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
- 2D .0515 "Particulates from Miscellaneous Industrial Processes"
- 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
- 2D .0521 "Control Of Visible Emissions"
- 2D .0958 "Work Practices for Sources of Volatile Organic Compounds"
- 2D .1111 "Maximum Achievable Control Technology"
- 2Q .0317 "Avoidance of Prevention of Significant Deterioration"
- 2D .1100 "Control of Toxic Air Pollutants"
- 2D .1806 "Control and Prohibition of Odorous Emissions"
- 2Q .0711 "Emission Rates Requiring a Permit"

However, a regulatory review is required at this time since there are new applicable regulations (2Q .0317, 2D .1100, 2D .1806 and 2Q .0711) for this permit revision due to the consolidation of two permits into one Title V permit. Since two plants (BHF Plant and Pioneer Plant) are being considered as one facility, a facility-wide review of the regulations mentioned above is required at this time.

In regards to PSD avoidance (2Q .0317), the only modification in the last five years that had the potential to exceed the significance levels as defined under PSD was the tenter frame (ES004-7) that was limited to less than 40 tpy of VOCs. In regards to 2D .1806, the Permittee shall prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. In regards to 2D .1100 and 2Q .0711, a facility-wide (including BHF and Pioneer Plants) toxic air pollutant evaluation is required since the Pioneer Plant has already triggered toxic air pollutant evaluation and demonstrated compliance. The Permittee shall be required to demonstrate compliance facility-wide with 2Q .0700 "Toxic Air Pollutant Procedures" by July 31, 2004 using the options available but most likely using a Schedule of Compliance.

## 6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

### NSPS

New Source Performance Standards (NSPS) do not apply to this facility.

### NESHAP/MACT

This facility is currently subject to the National Perchloroethylene Air Emission Standard for Dry Cleaning Facilities (40 CFR 63 Subpart M). The facility may also be subject to the Fabric Coating, Printing and Dyeing NESHAP (40 CFR 63 Subpart OOOO) that was promulgated May 29, 2003. The initial notification for NESHAP Subpart OOOO is due by May 29, 2004.

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**PSD**

This facility is a major PSD source for nitrogen oxides, sulfur dioxide and volatile organic compounds (VOCs) considering the consolidation of the two plants into one facility.

Original

Attainment Status

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

112(r)

This 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.

CAM

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) does not apply since there are no control devices present on any sources at this facility except for the dry-to-dry cleaner controlled by a refrigerated condenser and the sodium sulfate silo controlled by a bagfilter.

The dry-to-dry cleaner controlled by a refrigerated condenser is subject to the National Perchloroethylene Air Emission Standard for Dry Cleaning Facilities (40 CFR 63 Subpart M); therefore, CAM (40 CFR Part 64) does not apply. CAM (40 CFR Part 64) does not apply to the sodium sulfate silo controlled by a bagfilter since the silo is not considered to be a major pollutant specific emission unit (a source with > 100 tons per year of particulate matter in this case). By using the uncontrolled emission factor (0.46 lb PM-10 per ton cement) in AP-42 Chapter 11.12 (Concrete Batching) to estimate the uncontrolled particulate matter emissions and considering that cement and sodium sulfate have similar properties, the silo (maximum loading capacity of 20 tons per hour) has an uncontrolled emission rate of 9.2 pounds per hour or 40.3 tons per year.

**7. Facility-wide Air Toxics**

The facility must comply with the emission limitations and other requirements of 2D .1100 and 2Q .0711. A toxic air pollutant evaluation was triggered for the Pioneer Plant; therefore, the facility performed a dispersion modeling analysis for emissions of ammonia and formaldehyde to demonstrate compliance with their respective Acceptable Ambient Levels (AALs) under 2D .1104. The other toxic air pollutant emission rates were below their respective Toxics Permitting Emissions Rates (TPERs) under 2Q .0711. Since the two plants are being consolidated into one facility, a toxic air pollutant evaluation is required for the BHF and Pioneer Plants. The Permittee shall be required to demonstrate compliance facility-wide with 2Q .0700 "Toxic Air Pollutant Procedures" by July 31, 2004 using the options available but most likely using a Schedule of Compliance.

**8. Facility Compliance Status**

The facility was inspected on July 22, 2003 by Steve Moser and Tracy Hartgrove, both of WSRO and is considered to be in compliance. A Notice of Violation was sent to the facility of May 12, 2003 for deviations mentioned in the annual compliance certification and semi annual report. A response to the Notice of Violation received June 13, 2003 explained the reasons for the violations and was deemed satisfactory.

Based on a telcon with Steve Moser, WSRO on January 22, 2004, there are presently no compliance issues and no outstanding Notices of Violations (NOVs) for this facility; however, a Notice of Violation will most likely be issued in the near future regarding compliance issues with the toxics regulation for the entire facility.

## **9. Statement of Compliance**

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. 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 the 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.

## **10. Facility Emissions Review**

There is no change in emissions as a result of source modification for this renewal.

## **11. Stipulation Review**

All stipulations are standard for this type of facility.

*Based on the inspection report dated July 30, 2003, inspection date of July 22, 2003:*

- Steve Moser stated some concern with permit condition 2.1 D.2 and the 2D .0521 stipulation for the print transfer machines. The 2D .0521 stipulation should require the visual observations to be recorded in logbook. In fact, Steve Moser suggested in his comments (dated January 21, 2004) on the draft Title V permit that the visible emission monitoring be monthly for all sources aside from the boilers and the sodium sulfate silo that require daily monitoring. These suggestions have been incorporated into the Title V permit.

## **12. Public Notice / EPA and Affected State Review**

Pursuant to 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 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. Virginia is within 50 miles of Burlington and is the only affected State for this facility.

## **13. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

The draft permit and review were sent to WSRO. Minor comments were received and addressed. Steve Moser of WSRO recommends issuance of this air permit per his e-mail dated February 5, 2004.

Therefore, RCO proposes to issue air permit 00148T16.