

Coats American, Seiver Plant.
Permit No. 01895T20

(DRAFT) AIR PERMIT RENEWAL REVIEW

APPLICANT	SITE LOCATION	COUNTY
Coats American, Seiver Plant	Marion	McDowell

CONTACT	PHONE
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APPLICATION FOR:	Existing P/N
addition of thirteen bonding machine	01895T19

APPL. NO.	REVIEWER	SIGNATURE	DATE
5600001.02B	Gautam Patnaik		XXX xx, 2004

RECOMMENDATION AND COMMENT	FEE CLASS
Issue Permit No. 01895T20	Title V

1. Introduction:

This facility manufactures coated threads. The threads are coated with a bonding solution using a variety of water and solvent based solutions, by the bonding machines.

2. Purpose of Application

This application is for the renewal for their title V application. The current Air Permit No. 1895T19 was effective from March 16, 2005 and expires on February 28, 2006.

3. Application Chronology

This renewal application was received on 7/26/02. Since then the facility had applied for several modifications and had requested that this application be on hold in-order to expedite the requested several modifications to their permits. The table below outlines the modification to their permit since this application was received:

Application #	Date Application Received	Changes Made to the Permit	Permit Issued
5600001.02C	3/30/03	addition of two uncontrolled bonding machines (W20 & W21)	01895T16
5600001.03A	8/1/03	addition of two uncontrolled boilers (ES-9 & ES-10)	01895T17
5600001.04A	3/20/04	addition of thirteen thread bonding machines (Nos. W2, W3, W4, W9, W10, W11, W12, W13, W15, W16, W17, W18 and W19)	01895T18
5600001.04B	12/17/2004	increase the production of the existing insignificant source - dye house operation ES11	01895T19

Coats American, Seiver Plant.
Permit No. 01895T20

4. Permit Modification/Changes

No additions or changes have been made with this renewal of the permit.

5. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

15A NCAC 2D .0515 “Particulates Miscellaneous Industrial Processes”

15A NCAC 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

2D . 15A NCAC 0521 “Control Of Visible Emissions”

15A NCAC 2D .0524 “NSPS 40 CFR PART 60 SUBPART Dc”

15A NCAC 2D .0524 “40 CFR 60, Subpart VVV”

15A NCAC 2D .0614 “Continuous Assurance Monitoring 40 CFR 64

15A NCAC 2D .0958 “work practice standards for VOCs”

15A NCAC 2Q .0317 “PSD avoidance”

15A NCAC 2Q .0711 “air toxic pollutants”

15A NCAC 2D .0524 “Subpart OOOO—National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles”

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

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

NSPS

The two propane/natural gas/No. 2 fuel oil-fired boilers (50.0 million Btu per hour heat input capacity, each; ID Nos. ES-09 and ES-10) are subject to NSPS 40 CFR 60, Subpart Dc.

Coats American, Seiver Plant.
Permit No. 01895T20

The thread Bonding Operations (ID No. ES-04 through ES-5) and associated catalytic oxidizer (ID No. CD-06) and Uncontrolled Thread Bonding Operation (ID No. ES-6) are subject to NSPS 40 CFR 60, Subpart VVV.

NESHAP/MACT

This facility is subject to the “Printing, Coating, and Dyeing of Fabrics and Other Textiles” MACT standard (NSPS Subpart OOOO). The compliance date is the date 3 years after May 29, 2003.

PSD

This facility is a major for VOC for PSD purpose.

Attainment Status

This facility is located in McDowell County which is 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 apply to these control devices:

- a. multicyclones (ID Nos. CD-01 and CD-03),
- b. plate impingment scrubbers (ID Nos. CD-02 and CD-04),
- c. catalytic oxidizer (ID No. CD-05) and
- d. catalytic oxidizer (ID No. CD-06).

These control devices are subject to the testing, monitoring, record keeping and reporting conditions pertaining to this rule and these regulations are in their permit.

7. Facility Wide Air Toxics

Pursuant to 15A NCAC 2Q .0711 “Emission Rates Requiring a Permit,” the emissions from the facility do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The emissions from the facility including fugitive emissions, will not exceed the TPERs listed in 15A NCAC 2Q .0711.

8. Construction Permit (Part II)

The sources listed under Part II of the current permit (The permit shield described in General Condition R did not apply to these sources in the current permit) are removed from this part of the permit. And since this permit will provide for a 30 day comment period for the public and 45 days for an EPA review, there will no longer be a Part II in the current permit.

Source	Source Description
ES-07*	WB thread bonding-Hilden bonder
ES-08	fifteen thread bonding machines (Nos. W2***, W3***, W4***, W9***, W10***, W11***, W12***, W13***, W15***, W16***, W17***, W18***, W19***, W20** and W21**).
ES-09**	propane/natural gas/No. 2 fuel oil-fired boiler(50.0 million Btu per hour heat input capacity)
ES-10**	propane/natural gas/No. 2 fuel oil-fired boiler(50.0 million Btu per hour heat input capacity)
ES11****	Dye house operation

- * These bonding machines (ID No. ES-7 and thread bonding machines (Nos W20** and W21* of ES-8) were permitted under Part II Construction Permit as a 502(b)(10) change per NCAC 2Q .0523.
- ** These boilers (ID No. ES-09 and ES-10) were permitted under Part II Construction Permit as a 501(c)(2) change per 15A NCAC 2Q .0523.
- *** The thirteen bonding machines (Nos. W2, W3, W4, W9, W10, W11, W12, W13, W15, W16, W17, W18 and W19.) were permitted under Part II Construction Permit as a 2Q .0502(b)(10) change.
- **** These emission source/control device (ID No. ES-7 and thread bonding machines (Nos W20** and W21* of ES-8) were permitted under Part II Construction Permit as a 502(b)(10) change per NCAC 2Q .0523. The permit shield described in General Condition R did not apply.

9. Facility Compliance Status

As per the latest inspection report (on IBEAM) done on 08/20/2004 this facility was found to be in compliance.

10. 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.

11. Facility Emissions Review

Coats American, Seiver Plant.
Permit No. 01895T20

There is no change in emissions for this renewal.

12. Stipulation Review

All stipulations are standard for this type of facility. The general conditions are updated with the latest version found in the title V shell.

13. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V 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 public notice will 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 will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States for this facility.

14. 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 applicant was provided a draft of this permit and their major response are as mentioned below:

1. Alain Bertucchi the VP of manufacturing is now the Official contact.
2. Requested that the boiler (ID No. ES-02) be removed from the permit.
3. Requested that the testing of the oxidizer (ID No. CD-06) done within six months of the initial use of this control device.
4. Inserted place holder language for the Boiler MACT and 2Q .0705 Toxics SIC calls.

Regional Office was provided a draft of this permit and their comments taken into consideration.

Regional Office concurs(?) with RCO recommendation to issue air permit.

15. Table of Changes

Page Number	Condition Number	Change
	Source Listing	All references to unshielded sources are removed
6	2.1 A. 2. d. iii. (C)	Change of method for gross calorific value

Coats American, Seiver Plant.
Permit No. 01895T20

29	2.2 A. 1. c. ii. 3.	Change of method for gross calorific value
31	2.4 A. 1. d.	Monitoring approach reformatted into a table format.
33	2.4 B. 1. d	Monitoring approach reformatted into a table format
34	2.4 C. 1. d	Monitoring approach reformatted into a table format
36	2.4 D. 1. d	Monitoring approach reformatted into a table format
38	General Conditions	Updated General Conditions