

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX

Region: Asheville Regional Office
County: Rutherford
NC Facility ID: 8100164
Inspector's Name: Mike Parkin
Date of Last Inspection: 05/19/2005
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Cone Denim LLC - Cliffside Plant No. 2 Facility Address: Cone Denim LLC - Cliffside Plant No. 2 3478 US Highway 221-A Cliffside, NC 28024 SIC: 2211 / Weaving Mills, Cotton NAICS: 31321 / Broadwoven Fabric Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 8100164.04A Date Received: 11/29/2004 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02828/T10 Existing Permit Issue Date: 09/26/2000 Existing Permit Expiration Date: 08/31/2005		
Allen Toney (828) 657-1089 P O Box 335 Cliffside NC, 28024	Terry Hines General Manager (828) 657-1010 P O Box 335 Cliffside NC, 28024	Arthur Toompas Corporate Environmental Manager (336) 230-7216 White Oak Plant Greensboro NC, 27405			
Review Engineer: Kevin Godwin Review Engineer's Signature: _____ Date: _____			Comments / Recommendations: Issue 02828/T11 Permit Issue Date: Permit Expiration Date:		

1. Purpose of Application

This permit revision is a renewal of existing Title V permit 02828T10 pursuant to 15A NCAC 2Q .0513. The initial Title V permit 02828T10 was issued in September 26, 2000 and is set to expire on August 31, 2005. The renewal application was received on November 29, 2004 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewed permit has been either issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewed permit has been issued or denied.

2. Facility Description

Cone Denim, LLC operates two plants Cliffside Plant No. 2 and Jacquard Weave Plant at this Rutherford County site. Cliffside Plant No. 2 dies yarn with indigo dye ranges for the manufacture of denim fabrics. Jacquard Weave Plant slashes and weaves yarn for jacquard style fabric.

3. Permit Modification/Changes

The initial Title V permit was issued on September 26, 2000. In a June 15, 2005 letter, the applicant requested the ability to burn No. 2 fuel oil in boilers (ID Nos. ES-B1 and ES-B2). Upon renewal, that request is granted. No permit changes have taken place since the initial Title V.

4. Application Chronology

November 29, 2004	Received renewal application from Cone Denim, LLC
July 19, 2005	Downloaded most recent inspection report most recent inspection report from IBEAM database
August 1, 2005	E-mailed draft to Asheville Regional Office (ARO)
September 8, 2005	Submitted draft to Title V Coordinator
, 2005	Draft noticed to public and EPA

5. Regulatory Review

Cone Denim LLC Cliffside Plant No. 2 is 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 .0535 "Excess Emissions Reporting and Malfunctions"
15A NCAC 2D .0958 "Work Practices for Sources of Volatile Organic Compounds"
15A NCAC 2Q .0317 "Avoidance Conditions" for avoidance of 15A NCAC 2D .0530

Cone Denim LLC Jacquard Weave Plant is 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 .0524 "New Source Performance Standards" Subpart Dc
15A NCAC 2D .0535 "Excess Emissions Reporting and Malfunctions"
15A NCAC 2D .0958 "Work Practices for Sources of Volatile Organic Compounds"
15A NCAC 2Q .0317 "Avoidance Conditions" for avoidance of 15A NCAC 2D .0530

Below is a summary of potential facility-wide criteria pollutant emissions based on 2003 emissions inventory information.

Pollutant	Emission Rate (tpy)
Carbon monoxide	24.1
Nitrogen oxides	260.3
Particulate matter less than 10 microns	107.6
Sulfur dioxide	1,580.5
Volatile organic compounds	36.8

The following table summarizes the changes to the permit:

New Page #	Old Page #	Section	Description of Change
Entire permit	Entire permit	Entire Permit, where applicable	Changed reference from “Air Quality Title V Operation Permit” to “Air Quality Federal Title V and State Operation Permit” and “Air Quality Construction and Operation Permit” to “Air Quality State Operation Permit”
Cover letter	Cover letter	Cover letter	Modified to reflect current permit number, issue and effective date, and associated application information.
N/A	N/A	Attachment	Added table with changes to Title V as Attachment
6, 7, 8, and 9	6, 7, 8, and 9	2.1A.	Included ability to burn No. 2 fuel oil in boilers (ID Nos. ES-B1 and ES-B2)
19	19	Section 3	Updated with most recent General Conditions and List of Acronyms

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

NSPS

New Source Performance Standard, Subpart Dc does apply to the boiler (ID No. ES-JWB1) at the Jacquard Weave Plant. A standard condition stating the facility’s requirements under Subpart Dc is included in the existing permit and is carried over to the renewed permit.

NESHAPS

Based on most recent and historical emission inventory information, this facility is a minor HAP source.

PSD

Based on potential sulfur dioxide emissions this facility would be PSD major, but has taken federally enforceable fuel usage limits on the boilers to remain PSD minor.

Attainment Status

Rutherford County is in attainment with all pollutants.

112(r)

According to the renewal application, this facility does not have any sources that are subject to Section 112(r) of the 1990 CAAA.

CAM

Pursuant to 15A NCAC 2D .0614, a compliance assurance monitoring (CAM) applicability determination is required for this renewal because: (1) the facility is a Title V source with potential emissions that exceed the Title V major source thresholds without considering controls; and (2) there are sources subject to an emission standard that require controls in order to comply with that standard.

In this case, the emission sources controlled by the rotary drum filters and bagfilters are potentially subject to CAM.

Beaming frames (ID No. ES-BM1) located at Cliffside Plant No. 2 are controlled by two separate condenser pre-filter/rotary drum filter systems. Potential pre-control PM₁₀ emissions from each individual system are reported in the initial Title V application, based on material balance, to be 58.7 tpy.

Weave room sources (ID No. WR1) located at Cliffside Plant No. 2 are controlled by six semi-cylindrical filters and four rotary drum filters. Potential pre-control PM₁₀ emissions for each of the four rotary drum filters are reported in the initial Title V application, based on material balance, to be 2.66 lb/hr or 11.7 tpy.

Two Abington lint collection systems (ID Nos. ES-AF1 and ES-AF2) located at Cliffside Plant No. 2 are each controlled by bagfilters. Potential pre-control PM₁₀ emissions from each Abington lint collections system is reported in the initial Title V application, based on material balance, to be 32 tpy.

Two storage silos (ID Nos. ES-PS1 and ES-SS1) located at Cliffside Plant No. 2 are controlled by bagfilters. Potential pre-control PM₁₀ emissions from each of the storage silos is reported in the initial Title V application, base on material balance, to be 1.3 tpy.

The Jacquard weave room sources (ID No. ES-JWR1a) are controlled by eight rotary drum filters. Potential pre-control PM₁₀ emissions from the Jacquard weave room sources are reported in the initial Title V application, based on material balance, to be 1.62 tpy.

Since potential pre-control PM₁₀ emissions are less than 100 tons per year, the facility is exempt from the requirements of CAM.

7. Facility-wide Air Toxics

An increase in facility-wide TAP emissions is not expected. The existing permit does not contain any conditions relating to state-only TAP emissions.

8. Facility Compliance Status

The DAQ has reviewed the compliance status of this facility. Cone Denim, LLC Cliffside Plant No. 2 and Jacquard Weave Plant were most recently inspected by Mr. Mike Parkin (ARO) on May 19, 2005. At the time of inspection, the facility appeared to be operating in compliance with the requirements of the permit. The facility's five year compliance history is detailed in the regional inspection report.

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 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.

9. Stipulation Review

The following stipulation changes are made upon this renewal:

For natural gas/No. 2/No. 6 fuel oil-fired boilers (ID Nos. ES-B1, ES-B2, and ES-B5); as recommended in the inspection report, only require daily V.E. observations when firing No. 6 fuel oil.

For dye ranges (ID Nos. ES-DR1, ES-DR2, and ES-DR3); as recommended in the inspection report, remove V.E. monitoring requirement.

For beaming frames (ID Nos. ES-BM1a and ES-BM1b), as recommended in the inspection report, require weekly V.E. monitoring when the system is venting to the atmosphere.

For slashers (ID Nos. ES-SL1 through ES-SL8), as recommended in the inspection report, remove V.E. monitoring requirement.

For weave room (ID No. ES-WR1), as recommended in the inspection report, require weekly V.E. monitoring when system is venting to the atmosphere.

For Abington lint collection systems (ID Nos. ES-AF1 and ES-AF2), as recommended in the inspection report, change V.E. monitoring to weekly.

For the storage silos (ID Nos. ES-PS1 and ES-SS1), as recommended in the inspection report, require V.E. observations only during loading of silos.

For natural gas/No. 2 fuel oil-fired boiler (ID No. JWB1), as recommended in the inspection report, remove V.E. monitoring requirement.

No other stipulations are changed upon this renewal. All other stipulations are standard for this type of facility.

10. Public Notice/EPA and Affected States 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 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. South Carolina is an affected state for this facility.

Public notice of the DRAFT Title V permit was published in the XX on XX and the public comment period ran from XX through XX.

11. Conclusions, Recommendations, and Comments

The renewal Title V application for Cone Denim, LLC Cliffside Plant No. 2 and Jacquard Weave Plant has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The ARO concurs with issuance of this permit renewal. Upon completion of public notice and EPA review periods, the DAQ proposes to issue the Title V permit renewal.

12. Miscellaneous Requirements

PE Seal

Pursuant to 2Q .0112, no PE Seal was required because the permit renewal does not involve the determination of applicability and appropriateness or performance of air pollution capture and control systems [15A NCAC 2Q .0112(b)(2) and (3)].

Zoning

A request for zoning consistency determination is not required for this permit renewal.

Fee Classification

Based on potential to emit, this facility has been classified as **Title V Major**. The facility's current IBEAM status is **Title V Major**. This renewal **will not** change the fee classification.