

FIRST TIME TITLE V AIR PERMIT APPLICATION REVIEW

APPLICANT: E.J. Snyder & Co. Inc.	SITE LOCATION: Albemarle	COUNTY: Stanley
TECHNICAL CONTACT: Bill Peak	PHONE: (704) 982-9105	RESPONSIBLE OFFICIAL: Edward J. Snyder
REVIEW ENGINEER: Mark Cuilla	SIGNATURE:	DATE: XXXX XX, 2003
REGIONAL CONTACT: Mohammad Madjdindsb	REGIONAL OFFICE: Mooresville	SIC CODE: 2269
APPLICATION NUMBER: 8400048.02A	EXISTING PERMIT NUMBER: 02730R12	NEW PERMIT NUMBER: 02730T13

I Introduction

Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA. An application for permit renewal was made by the facility in June 4, 2001. The facility requested the removal of its Synthetic Minor limitation and that they be reclassified as Title V. Permit 02730R11 was issued on July 23, 2001. This permit officially reclassified the facility and included a specific condition that a Title V permit application be submitted by July 23, 2002. This application fulfills that requirement.

This first time Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

The following table lists all current emission sources with a comparison of identification (ID) numbers. The first time Title V permit will ID sources differently than permit 02730R12 as requested by the facility.

Emission Source (Brief Description)	02730R12 ID Nos.	02730T13 ID Nos.
Boiler 1	ES1	ES-Boiler1
Boiler 2	ES2	ES-Boiler2
Boiler 3	ES3	ES-Boiler3
Tenter Dryer	ES4	ES-Tubular1
Tenter Dryer	ES5	ES-Tubular2
Tenter Dryer	ES6	ES-Tubular3
Tenter Dryer	ES7	ES-Tubular4
Tenter Dryer	ES8	ES-Tubular6
Tenter Dryer	ES9	ES-OpenWidth1
Tenter Dryer	ES10	ES-OpenWidth2
Tenter Dryer	ES11	ES-OpenWidth3
Tenter Dryer	ES12	ES-Tubular5
(7) cloth nappers	ES13	ES-Nappers
(5) cloth shearers, (2) cloth nappers, and (1) sander	ES14	ES-Shears
Heat Set	Insignificant/No ID	I-HeatSet

Emission Source (Brief Description)	02730R12 ID Nos.	02730T13 ID Nos.
(8) Tumble Dryers	Insignificant/No ID	I-TumbleDryA1 through A8
(16) Tumble Dryers	NA	I-TumbleDryB1 through B16
(2) Tumble Dryers	NA	I-TumbleDryC1 and C2
(11) Atmospheric Dye Becks	Insignificant/No ID	I-OpenBecks1 through 11
(23) Pressure Dye Becks	Insignificant/No ID	I-PressBecks1 through 23
200,000 Fuel oil tank	NA	I-FO-Tank1
1,000,000 Fuel oil tank	NA	I-FO-Tank2
1,000,000 Fuel oil tank	NA	I-FO-Tank3
(2) 15 gallon degreasers	NA	I-Degrease1 and 2
(6) unrolling operations	NA	I-Unroll1 through 6
(6) rolling operations	NA	I-Roll1 through 6
(3) turning machines	NA	I-Turn1 through 3
Dye mixing room	NA	I-DyeMix
(2) extractors	NA	I-Extract1 and 2
(4) wet pad chemical mixing stations	NA	I-PadMix1 through 4
(10) wet pads	NA	I-WetPads1 through 10
(2) slitters	NA	I-Slitter1 and 2
(6) calendars	NA	I-Cal-Com1 through 6
(6) cloth compactors	NA	I-Compact1 through 6
Wrapping machine	NA	I-Wrap
(14) chemical storage tanks	NA	I-ChemTank1 through 14
(2) stripe matching machines	NA	I-Stripe1 and 2
Propane air system	NA	I-LPG-Air
Comfort ventilation and make up air systems	NA	I-Vent

Note 1. All emission sources beginning with "I" in its identification number are considered insignificant/exempt sources.

Note 2. "NA" means that the corresponding source was not listed in the permit.

II. Background Information

The DRAFT Title V operating permit will replace an existing Air Quality Construction and Operation Permit No. 0273R12 which was issued on **November 20, 2001** and is currently scheduled to expire on **June 30, 2006**.

Pursuant to 15A NCAC 2Q .0504, E.J. Snyder & Co. Inc., submitted its initial Title V application to the DAQ on **July 24, 2002**. The application was considered complete for processing on **August 19, 2002**. The DRAFT permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

Draft permit and permit review sent (via email) to MRO for comment on **January 30, 2003**. Comments were received by me (via email) on **February 3, 2003**. See Section XIV for responses.

Draft permit sent (via mail) to Mr. E.J. Snyder Jr. (E.J. Snyder, Inc.) and Mr. Conrad Carter (Alpha Environmental) on **January 31, 2003**. Comments were received by me (via email) on **February 28, 2003**. See Section XIV for responses.

III. Facility Description

The facility is a commercial cloth dye house. The facility receives greige and yarn-dyed cloth in tubular form from their clients. Various cleaning, dyeing, and finishing operations are performed on the cloth to the client's specifications. The facility consists of a dye house, finishing areas and support equipment.

IV. Statement of Compliance

The facility was inspected on January 16, 2002, by Mohammad Madjinasab of the MRO. A NOV was issued because the facility had not kept inspection and maintenance logs for the afterburners. The facility was in compliance with all other applicable requirements.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is being issued:

Emission Source ID No(s).	Emission Source Description	Control Device ID No(s).	Control Device Description
ES-Boiler1	One natural gas/No. 6 fuel oil-fired boiler (25.1 million Btu/hr maximum heat input)	NA	NA
ES-Boiler2	One natural gas/No. 6 fuel oil-fired boiler (25.1 million Btu/hr maximum heat input)	NA	NA
ES-Boiler3	One natural gas/No. 6 fuel oil-fired boiler (97.2 million Btu/hr maximum heat input)	NA	NA
ES-Tubular1	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-Tubular1	One natural gas/propane-fired afterburner (4.5 million Btu/hr maximum heat input)
ES-Tubular2	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-Tubular2	One natural gas/propane-fired afterburner (4.5 million Btu/hr maximum heat input)
ES-Tubular3	One natural gas/propane-fired textile tenter dryer (4.8 million Btu/hr maximum heat input; 2500 lbs/hr maximum process rate)	NA	NA
ES-Tubular4	One natural gas/propane-fired textile tenter dryer (4.5 million Btu/hr maximum heat input; 2500 lbs/hr maximum process rate)	NA	NA
ES-Tubular5	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-Tubular5	One natural gas/propane-fired afterburner (3.0 million Btu/hr maximum heat input)
ES-Tubular6	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-Tubular6	One natural gas/propane-fired afterburner (5.5 million Btu/hr maximum heat input)

Emission Source ID No(s).	Emission Source Description	Control Device ID No(s).	Control Device Description
ES-OpenWidth1	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-OpenWidth1	One natural gas/propane-fired afterburner (6.0 million Btu/hr maximum heat input)
ES-OpenWidth2	One natural gas/propane-fired tenter dryer (7.0 million Btu/hr maximum heat input; 2500 lbs/hr maximum process rate)	NA	NA
ES-OpenWidth3	One Tenter Dryer (2500 lbs/hr maximum process rate)	CD-OpenWidth3	One natural gas/propane-fired afterburner (6.0 million Btu/hr maximum heat input)
ES-Nappers	Operation consisting of: Seven cloth nappers (6500 pounds per hour maximum process rate, combined)	CD-NappersA CD-NappersB	Two parallel rotary drum filters (400 square feet of filter area, each)
ES-Shears	Operations consisting of: Five cloth shearers, Two cloth nappers, and One Sander (5000 pounds per hour maximum process rate, combined), and Lint from drum filters (ID Nos. CD-NappersA and CD-NappersB)	CD-ShearsA CD-ShearsB	Two drum filters installed in series (133 and 455 square feet of filter area, respectively)

VI. Emission Source-by-Source Evaluation

This permit application is for the conversion of the State operating permit 02730R12 to a first time Title V permit 02730T13. The facility is not proposing to add, delete, or modify any of the equipment with this submittal. Therefore continued compliance with all applicable air quality regulations is expected (See Section IV for statement of compliance from last inspection). The following subparagraphs will briefly highlight the applicable requirements for each of the permitted pieces of equipment. The basis for the following sections is the regional review for permit 02730R11 (Issued July 23, 2001).

A. Three Natural gas/No. 6 fuel oil boilers (ES -Boiler1 through ES -Boiler3)

The three boilers are each subject to the particulate matter emission standard of 15A NCAC 2D .0503, the sulfur dioxide emission standard of 15A NCAC 2D .0516, and the visible emission standards of 15A NCAC 2D .0521.

1. 15A NCAC 2D .0530. The allowable emission limit is based on the total heat input of the facility. The three boilers have a combined heat input of 147.4 million Btu per hour. This equates to an allowable particulate emission limit of 0.30 pounds per million Btu. Based on a comparison with the DAQ spreadsheets for the combustion of both natural gas and No. 6 fuel oil, all three boilers demonstrate compliance with the particulate matter emission limit set by this rule.

2. 15A NCAC 2D .0516. This rule limits the emission of sulfur dioxide to 2.3 pounds per million Btu. This amount equates to an allowable emission rate of 57.73 pounds per hour for boilers 1 and 2 and 223.56 pounds per hour for boiler 3. Based on a comparison with the DAQ spreadsheets for the combustion of both natural gas and No. 6 fuel oil, all three boilers demonstrate compliance with the sulfur dioxide emission limit set by this rule.
3. 15A NCAC 2D .0521. By rule, boilers 1 and 2 are subject to the 40 percent visible emission limit and boiler 3 is subject to the 20 percent visible emission limit. At the last inspection, all boilers were in compliance with their respective limit.

B. Six tubular tenter dryers and three open width tenter dryers (ES -Tubular1 through Tubular6 and ES -OpenWidth1 through OpenWidth3)

All tenter dryers are each subject to the particulate matter emission standard of 15A NCAC 2D .0515, the visible emission standards of 15A NCAC 2D .0521, and are part of the facility-wide work practice standards for the control of volatile organic compounds of 15A NCAC 2D .0958.

1. 15A NCAC 2D .0515. Per the permit application, each tenter dryer has an estimated production rate of 2500 pounds per hour. This equates to an allowable particulate matter emission limit of 4.76 pounds per hour. Per the review for permit 02730R10 Mooresville Regional Office comments that “No particulate emissions are expected from the tenter dryers other than the emissions from the combustion of natural gas and propane.” Based on a comparison with the DAQ spreadsheets for the combustion of natural gas and propane for the largest of the tenter dryers (as worst case), compliance is demonstrated for the particulate matter emission limit.
2. 15A NCAC 2D .0521. By rule, each tenter dryer is subject to the 20 percent visible emission limit. At the last inspection, all tenter dryers were in compliance with their respective limit.
3. 15A NCAC 2D .0958. See Section VII of this document for the requirements of the facility for compliance with the work practice standards.

C. Napping and Shearing Operations (ES -Nappers and ES -Shears)

All napping and shearing operations are subject to the particulate matter emission standard of 15A NCAC 2D .0515, the visible emission standards of 15A NCAC 2D .0521, and are part of the facility-wide work practice standards for the control of volatile organic compounds of 15A NCAC 2D .0958.

1. 15A NCAC 2D .0515. Per the permit application, the napping operation has an estimated production rate of 6500 pounds per hour and the shearing operation has an estimated production rate of 5000 pounds per hour. This equates to an allowable particulate matter emission limit of 9.03 and 7.58 pounds per hour, respectively. A review of the permit application calculations for actual particulate emissions from both the napping and shearing operations indicate compliance with the particulate emission limit of this rule.
2. 15A NCAC 2D .0521. By rule, the napping and shearing operations are subject to the 20 percent visible emission limit. At the last inspection, all napping and shearing operations were in compliance with their respective limit.
3. 15A NCAC 2D .0958. See Section VII of this document for the requirements of the facility for compliance with the work practice standards.

VII. Multiple Emission Source Limits

A. 15A NCAC 2D .0958 “Work Practices for Sources of Volatile Organic Compounds”

- 1. Description
 - i. All subject emission sources

The above emission sources are subject to these multiple emission source limits and/or standards:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Volatile organic compounds	Work practice standards	15A NCAC 2D .0958

2. Regulatory Analysis

Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:

- i. store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
- ii. clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
- iii. store wipe rags containing volatile organic compounds in closed containers,
- iv. not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
- v. transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under Section 402 of the Clean Water Act,
- vi. clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under Section 402 of the Clean Water Act.

When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:

- i. flush parts in the freeboard area,
- ii. take precautions to reduce the pooling of solvent on and in the parts,
- iii. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
- iv. not fill cleaning machines above the fill line,
- v. not agitate solvent to the point of causing splashing.

3. Monitoring Requirements

To assure compliance the Permittee shall at a minimum perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required

inspections are not conducted the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

4. Recordkeeping Requirements

The results of the inspections shall be maintained in a logbook on-site and made available to an authorized representative upon request. The logbook shall record the following:

- i. the date and time of each inspection; and
- ii. the results of each inspection noting whether or not noncompliant conditions were observed.

If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

5. Reporting Requirements

The Permittee shall submit a summary report of the observations semi-annually. All instances of deviations from the requirements of this permit must be clearly identified.

VIII. MACT Applicability and Requirements

On July 11, 2002, EPA proposed the National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles (Subpart OOOO). This Subpart establishes national emission standards for hazardous air pollutants for fabric and other textiles printing, coating and dyeing facilities. The Subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Categories and entities potentially regulated by these proposed standards include those in NAICS Code 313312, Textile and Fabric Finishing (except broadwoven fabrics) Mills, of which this facility is included.

Facilities are subject to this Subpart if they operate a new, reconstructed, or existing affected source, as defined in 40 CFR 63.4282, that is a major source, or is part of a major source of hazardous air pollutants (HAPs). Based on a review of the facility's current operations and emission sources, the facility is not subject to this proposed MACT standard because they are not a major source of HAPs.

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. Other Applicable Requirements

A. PSD

Based on facility-wide potential emissions, the facility is a PSD major source. Stanly County has been triggered for PM₁₀ and SO₂. This first time Title V application does not increase the emissions of either pollutant. The facility has requested that a facility-wide PSD avoidance condition limiting the annual usage of No. 6 fuel oil be placed in its permit. A calculated level of 1,445,000 gallons per year has been proposed by the facility in order to keep facility-wide SO₂ emissions below 250 tons per year from its three boilers. This requested limitation is not necessary because the boilers installed in 1967, 1971, and 1973, all pre-date the 1974 PSD and are considered grandfathered major stationary sources.

B. North Carolina Air Toxics

This facility has not yet triggered air toxics.

XI. General Conditions

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the Permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, severability, etc.

XII. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. Although each insignificant activity is not listed in the Title V permit, a general condition is placed in the Title V permit stating that all insignificant activities shall comply with the applicable requirements. Those sources which qualify for exemption from permitting under regulation 2Q .0503(8) will be attached to the cover letter of the permit.

Emission Source	Date of Application	Exemption Regulation	Applicability to Regulation
One natural gas-fired heat set (1.0 million Btu per hour maximum heat input) (ID No. I-Heat Set)	06/15/01	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Eight natural gas-fired textile tumble dryers (2.96 million Btu per hour maximum heat input) (ID Nos. I-TumbleDryA1 through A8)	06/15/01	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Sixteen natural gas-fired textile tumble dryers (2.64 million Btu per hour maximum heat input) (ID Nos. I-TumbleDryB1 through B16)	06/15/01	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Two natural gas-fired textile tumble dryers (0.488 million Btu per hour maximum heat input) (ID Nos. I-TumbleDryC1 and C2)	06/15/01	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Eleven atmospheric dye becks** (ID Nos. I-OpenBecks1 through 11)	10/29/96	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Twenty-three pressure dye becks** (ID Nos. I-PressBecks1 through 23)	10/29/96	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One 200,000 gallon No. 6 fuel oil tank (ID No. I-FO-Tank1)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One 1,000,000 gallon No. 6 fuel oil tank (ID No. I-FO-Tank2)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One 1,000,000 gallon No. 6 fuel oil tank (ID No. I-FO-Tank3)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Two 15 gallon degreasers (ID Nos. I-Degrease1 and 2)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Six unrolling operations (ID Nos. I-Unroll1 through 6)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Six rolling operations (ID Nos. I-Roll1 through 6)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.

Emission Source	Date of Application	Exemption Regulation	Applicability to Regulation
Three turning machines (ID Nos. I-Turn1 through 3)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One dye mixing room (ID No. I-DyeMix)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Two extractors (ID Nos. I-Extract1 and 2)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Four wet pad chemical mixing stations (ID Nos. I-PadMix1 through 4)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Ten wet pads (ID Nos. I-WetPads1 through 10)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Two slitters (ID Nos. I-Slitter1 and 2)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Six calendars (ID Nos. I-Cal-Com1 through 6)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Six cloth compactors (ID Nos. I-Compact1 through 6)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One wrapping machine (ID No. I-Wrap)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Fourteen chemical storage tanks (ID Nos. I-ChamTank1 through 14)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Two stripe matching machines (ID Nos. I-Stripe1 and 2)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
One propane-air system (ID No. I-LPG-Air)	07/24/02	15A NCAC 2Q .0503(8)	Potential emissions are less than 5 tons per year.
Comfort Ventilation and Make-up air systems (ID No. ES-Vent)	07/24/02	15A NCAC 2Q .0503(7)	Exempt because of category

** Calculations of emissions from the eleven (11) atmospheric and twenty-three (23) pressure dye becks were included in the permit application. The facility estimated emissions based on actual dye usage for the entire facility and percentage of fabric dyeing that takes place in each type of beck. The facility estimates that 98% of all dyeing occurs in the pressure becks. In addition, the facility has estimated that these emissions require that the pressure becks be considered non-exempt equipment. However, a determination that this equipment is exempt was made by Mooreville Regional Office on October 29, 1996. The regional office stated that, “Based upon the information submitted in your (E.J. Snyder) letter received on September 30, 1996, it appears that the potential PM/SO₂/NO_x/VOC/CO and HAP emissions from the eleven (11) atmospheric dye becks and twenty-three (23) pressure dye becks are each less than the exemption levels”. Therefore, this equipment will remain designated as exempt equipment for permitting purposes.

XIII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the draft Title V Operating 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.

XIV. Recommendations

E.J. Snyder & Company, Inc's, first time Title V application 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 DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the DRAFT permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.

Summary of Mooresville Regional Office Comments of DRAFT Permit and Review

Comment: The descriptions of the tenter frames are not consistent with previous inspections. Please refer to the latest inspection report. Also, all these tenter frames are natural gas/propane-fired units and this needs to be included in the description. The description also needs to include the maximum heat input rates.

Response: The ID Nos. and descriptions for the tenter frames were verified in the permit application. The facility has noted each old ID No. and its corresponding new ID No. (See table in Section I of this document for comparison).

Comment: When we (MRO) put stipulation 2D .0958 (into a permit), we do not list it under all sources. Why is it listed under all sources? Units such as boilers are not subject to these regulations.

Response: Agree; the requirement for the boilers to comply with the work practice standards is not necessary. This will be removed. The language stating the work practice standards will be clarified to apply to those "applicable emission sources."

Comment: Under stipulation 2D .0521 for boilers, it is stated that monitoring, recordkeeping, and reporting do not apply when boilers are combusting natural gas. Why is it so?

Response: This stipulation is added in response to the latest Title V permit shell documents. The combustion of natural gas, propane, and No. 2 fuel oil do not require monitoring, recordkeeping and reporting. However, these same boilers are also permitted to combust No. 6 fuel oil. All monitoring, recordkeeping and reporting requirements apply for the use of this fuel.

Comment: There are two (2) 1,000,000 gallon No. 6 fuel-oil tanks, and only one is listed in the air permit.

Response: Agree; the insignificant activities/exempt source list will be corrected to identify these fuel oil tanks.

Comment: There are a number of insignificant sources within the (DRAFT) air permit which are not listed in previous air permits and inspection reports. These are listed in the AQ-16 (review) and start from unrolling operations to the end of the list. Where are these listed in the application?

Response: The facility has provided a list of insignificant/exempt sources in form E2 of the permit application. In addition, Appendix C contains the calculations demonstrating the source listings. Many of these sources are not on the current permit and are being added in this action.

Summary of Facility's Comments of DRAFT Permit

Comment: The facility has requested that the reporting period necessary for compliance with the 2D .0516, SO₂ emission standards be decreased from semi-annually to an annual period. They comment that the facility has always purchased 2.1% fuel oil.

Response: The semi-annual reporting requirement can not be altered. It is a Part 70 requirement.

Comment: The facility questions the necessity of the daily visible emissions monitoring for the boilers and tenter frames. They state that because they have never received a NOV for particulate emissions and are only Title V because of sulfur dioxide emissions, they should not be required to conduct monitoring for visible emissions and the condition should be removed.

Response: The title permit shell lists daily visible emission monitoring requirements. Mooresville Regional Office concurs that this is appropriate.

Comment: The facility requests that the monitoring, recordkeeping and reporting requirements to ensure compliance with the 2D .0515, particulate emission standards be removed from the permit (for the tenter frames). They base this on the fact that they have never received a NOV for excess particulate matter and that they are title V because of sulfur dioxide.

Response: Particulate emission requirements including all monitoring, record keeping and reporting are required to ensure compliance at the specified frequencies. Mooresville Regional Office concurs that this is appropriate.

Comment: The facility requests that the monitoring and reporting requirements for the ductwork and collection unit to ensure compliance with the 2D .0515, particulate emission standards be removed from the permit (for the napping and shearing operations). They base this on the fact that they have never received a NOV for excess particulate matter and that they are title V because of sulfur dioxide.

Response: Particulate emission requirements including all monitoring, record keeping and reporting are required to ensure compliance at the specified frequencies. Mooresville Regional Office concurs that this is appropriate.

Comment: The facility has requested that the monthly monitoring and reporting requirements to comply with the visible emissions from the napping and shearing operations be removed from the permit because they have never received a NOV for visible emissions and that they are title V because of sulfur dioxide.

Response: The title permit shell lists monthly visible emission monitoring requirements. Mooresville Regional Office concurs that this is appropriate.

Comment: The facility comments that the 2D .0958, Work Practice Standards, have no justification for conducting monthly inspections and submitting semi-annual reporting and request that these be removed from the permit. They base this on the fact that the regulation is written around the mixing, blending, or manufacturing of VOCs. Virtually all of the VOC emissions occur in the tenter dryers where the chemical is evaporated. In addition the facility also states that they have never received a NOV for not following the work practice standards and that they are not title V for VOCs.

Response: The work practice standards as written have been federally approved; therefore their compliance is necessary. Mooresville Regional Office concurs that this is appropriate.