

TITLE V AIR PERMIT MODIFICATION APPLICATION REVIEW

APPLICANT: Interface Fabrics Group South, Inc.	SITE LOCATION: Elkin	COUNTY: Surry	
TECHNICAL CONTACT: Will Fritz	PHONE: (336) 526-0604	RESPONSIBLE OFFICIAL: Ray Ogden	TITLE: President
REVIEW ENGINEER: Mark Cuilla	SIGNATURE:	DATE: XXXXXX, 2003	
REGIONAL CONTACT: Ray Stewart	REGIONAL OFFICE: WSRO	SIC CODE: 2221, 2262, 2281, and 2297	
APPLICATION NUMBER: 8600006.02B	EXISTING PERMIT NUMBER: 01315T16	NEW PERMIT NUMBER: 01315T17	

I Introduction/Purpose of Application

Interface Fabrics Group South, Inc., owns and operates a textile mill in Elkin, NC. The purpose of this permit application is as follows:

1. In accordance with 15A NCAC 2Q .0513(b) this application completes the requirements for renewal of the Title V operating permit 01315T16. This application includes all changes that have occurred at the facility since the permit was issued;
2. Include federally enforceable permit conditions to ensure that the facility-wide HAP emissions remain below major source thresholds;
3. Officially enter a name change for the facility from Chatham Inc., to Interface Fabrics Group South, Inc.;
4. Update all equipment lists to delete, modify and add equipment as necessary; and
5. Update and clarify permit conditions and add a Compliance Assurance Monitoring (CAM) schedule for the two remaining boilers at the facility.

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

Page(s)	Condition	Change
Cover	NA	-Updated permit revision numbers, dates, facility name, and mailing address
Attachment	Insignificant Activities Table	-Removed and added equipment as described below (see Section XII of this document)
3-4	Equipment Table	-Removed references to deleted equipment (ES01, ES10, ES14, ES15, and ES17) -Amended references to modified equipment (ES04, ES05, and ES06) -Moved references to now exempt equipment to the exempted activities table (ES08, ES09, and ES16) -Added references to equipment (ES20, ES28, ES29, and ES35)
5-7	2.1 A.1. through 3.	-Updated shell conditions with current shell (TVCOND50.wpd) -Added stack testing requirement for boilers 3 and 7

Page(s)	Condition	Change
7-8	2.1 A.4.	-Added CAM testing schedule for boilers 3 and 7
8-10	2.1 B.1. and 2	-Updated shell conditions with current shell (TVCOND50.wpd)
10-12	2.1 C.1. and 2	-Updated shell conditions with current shell (TVCOND50.wpd)
12-14	2.1 D.1. and 2.	-Updated shell conditions with current shell (TVCOND50.wpd)
14-15	2.1 E.1. and 2.	-Updated shell conditions with current shell (TVCOND50.wpd)
17-19	2.1 G.1. and 2.	-Added permit conditions for Calcium Carbonate Silo
19-20	2.1 H.1. and 2.	-Added permit conditions for Facility Maintenance Woodworking Shop
20-21	2.1 I.1.	-Added permit condition for 20,000 Gallon Horizontal No. 2 Fuel Tank
21-22	2.2 A.1.	-Updated shell conditions with current shell (TVCOND50.wpd)
22-23	2.2 B.1.	-Added permit conditions limiting HAP emissions to below major source thresholds
23-31	Section 3 – General Conditions	-Updated shell conditions with current shell (NEWSHE34.wpd)

II. History and Permit Application Background Information

September 14, 1998 – Initial Title V permit 01315T14 issued.

September 22, 2000 – Significant Modification 01315T15 issued.

June 6, 2002 – WSRO compliance inspection conducted.

November 28, 2002 – Permit application (8600006.02B) received by DAQ headquarters.

December 9, 2002 – Acknowledgement letter sent to facility.

December 13, 2002 – I spoke with Mr. Will Fritz concerning the equipment modifications at the facility. I specifically asked about the apparent installation of new equipment as indicated by the permit application. Mr. Fritz verified that all equipment mentioned in the permit application is currently installed at the facility; there is nothing “new” to be installed with this permit application.

January 9, 2003 – Clock stopped to verify the receipt and deposit of permit application fee. Confirmation of receipt of fee was verified February 9, 2003.

January 13, 2003 – WSRO permit review received by DAQ headquarters.

January 14, 2003 – I contacted Mr. Will Fritz via email requesting that control device information be sent to me to supplement the permit application. Specifically, I needed cyclone dimensions and fabric filter specifications.

January 15, 2003 – Mr. Fritz supplied control device specifications via fax.

January 21, 2003 – Application for 502(b)(10) modification was received and requested that it be completed as soon as possible. I stopped work on renewal application to complete this request.

March 3, 2003 – 502(b)(10) 01315T16 issued for the conversion of one of four existing tenter frames' drying sections from a steam-heated dryer to a natural gas-fired dryer (ID No. ES7b).

March 4, 2002 – DAQ had a meeting with representatives from Interface concerning the future expansion of the facility and Compliance Assurance Monitoring (CAM) issues. It was determined that the facility would include a schedule of testing of its boilers in order to verify CAM applicability. The renewed permit would include the schedule. The schedule will require that testing of the boilers and submittal of the results including parameter modifications would be completed and submitted within 180 days after the issuance of the permit.

March 19, 2003 – I received (via fax) the schedule of testing. I have entered it into the DRAFT permit.

April 11, 2003 – DRAFT permit sent to facility and regional office (via email).

April 28, 2003 – I received facility comments on DRAFT permit. See Section XIV of this document for a discussion of the comments.

III. Facility Description

Interface Fabrics Group South, Inc.'s operations include the manufacture of yarn, weaving operations, dyeing operations, fabric coating and finishing operations, and associated ancillary operations and equipment. The facility is also equipped with two steam-generating boilers which provide process steam and steam for comfort heating. The facility is classified as a major source for all criteria pollutants; except carbon monoxide and lead.

IV. Statement of Compliance

The facility was last inspected by the Winston-Salem Regional Office (Mr. Ray Stewart) on June 6, 2002. At the time of this inspection the facility was found to be in compliance with all applicable air quality regulations. The inspection report notes the necessary equipment additions and removals and stipulates that a permit condition be added to the permit requiring that a stack test be completed on boilers Nos. 3 and 7 to ensure compliance with the particulate matter emission standard.

V. Summary of Emission Sources and Control Devices

The following tables provide information describing the emission sources at the facility. The first table lists all significant emission sources and the second table contains a list of all of the emission sources that were deleted from the permit because they have been removed from operation. Insignificant/exempt sources are identified in Section XII of this document.

Table 1: Significant Sources

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES02	One coal/No. 2 fuel oil-fired boiler (80.0 million Btu per hour maximum heat input capacity, Boiler No. 3)	CD02	Scrubber (minimum of 50 gallons per minute water flow rate)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES03	One coal fired boiler (120.0 million Btu per hour heat maximum heat input capacity, Boiler No. 7)	CD03a CD03b	One multicyclone (150 nine inch tubes) and one multicyclone (60 six inch tubes) installed in series
ES04*	<u>Boiler No. 7 ash handling system (4.0 tons per hour total ash handling rate):</u> Ash Conveying (ES04a) Ash Silo (ES04b) Truck Loading (ES04c)	CD04a CD04b	One water spray steam condenser (40 gallons per minute water flow rate; installed on ES04a) One fabric filter installed on ES04b
ES05*	<u>Material Handling Operations:</u> Two fiber reclaim balers (3.0 tons per hour process feed rate)	CD05	One simple cyclone (120 inches in diameter)
ES06*	<u>Slashing Operations:</u> Two coater/dryers with steam heated drying cans (2.4 tons per hour process feed rate, combined)	NA	NA
ES07a ES07c ES07d	<u>Coating Operations:</u> Three tenter frames with steam heated dryers (3.6 tons per hour process feed rate combined, Nos. 101, 103, and 104 respectively)	NA	NA
ES07b	<u>Coating Operations:</u> One tenter frame with natural gas fired dryer (6.4 million Btu per hour maximum heat input; 1.2 tons per hour process feed rate, No. 102)	NA	NA
ES20*	Calcium carbonate silo	CD20	One fabric filter
ES28	Facility maintenance woodworking shop	CD28	One simple cyclone (60 inches in diameter)
ES29	Facility maintenance paint shop	NA	NA
ES35	20,000 gallon horizontal No. 2 fuel oil tank	NA	NA

Note 1. The shaded equipment above represents significant sources that have been added to the equipment list because, by definition, they can no longer be considered insignificant/exempt sources per this permit application (8600006.02B).

Note 2. The astericked sources (*) represent sources that have been modified in this permit application (8600006.02B). See description below.

Table 2: Deleted Sources

Emission Source ID No.	Emission Source Description
ES01	Two coal fired boilers (22.0 million Btu per hour heat input capacity each, Boiler Nos. 1 and 2)
ES10	Vacuum Clean-up Operations: fabric transport system (0.25 tons per hour process feed rate)
ES11	Fiberwoven Finishing Operations
ES13	Fiberwoven Dyeing Operations
ES14	One 11,000 gallon acetic acid storage tank
ES15	One 8,000 gallon acetic acid storage tank
ES17	One No. 2 fuel oil fired boiler (27.0 million Btu per hour heat input capacity, Boiler No. 4)
IES18	Four 350 gallon acetic acid tanks
IES19	Procedyne Fluidized Sand Bed Operations
IES21	Lime Silo with Bagfilter
IES24	Two raw dye dryers
IES26	Monomer melt spinning process with vapor condenser
IES38	Tube-TEX Drying Operations
IES39	Tumble Drying Operations

Several existing emission sources have undergone changes that need to be reflected in the amended Title V permit. They are referenced above in Table 1 (*). The following describes the changes:

1. ES04 – Boiler Ash Handling System – Emissions group is revised to include particulate matter emissions from the ash silo;
2. ES05 – Two Fiber Reclaim Balers – Emission group no longer includes the three dyehouse balers and three blending balers. These six balers have been removed;
3. ES06 – Slashing Operations – Emissions group now only includes two slashers. One slasher has been removed;
4. ES08 (Insignificant Source) – Shearing Operations – Emissions group now only includes two shears. One shear has been removed. Shearing operations now vent indoors through a baghouse and are no longer considered significant emission sources by the facility;
5. ES09 (Insignificant Source) – Napping Operations – Napping operations now vent indoors through a baghouse and are no longer considered significant emission sources by the facility;
6. ES16 (Insignificant Source) – Package Dye Operations – Source has been renamed. Two of the 1200 gallon kettles have been removed;
7. ES20 – Calcium Carbonate Silo – No longer meets the definition of an insignificant emission source; and
8. ES25 (Insignificant Source) – Taslan Operations – Emission sources have been relocated within the facility. Several old taslan machines were removed and replaced with newer equipment. However, emission sources remain insignificant.

VI. Emission Source Evaluation

The emission sources currently installed at the facility are not affected by this permit application excluding the following activities. Continued compliance with all others is expected.

1. Boilers (ID Nos. ES02 and ES03)

The remaining two boilers are subject to 15A NCAC 2D .0503, .0516, and .0521. The particulate emission and visible emission limits are not changed by this permit application. However, the boilers, because of their ability to combust coal as a primary fuel have the potential (pre-control) particulate emissions of greater than 100 tons per year. Therefore, they are subject to 40 CFR Part 64, Compliance Assurance Monitoring Plans (CAM).

A CAM schedule has been included as Permit Condition 2.1 A.4. This schedule requires the Permittee to test each boiler for compliance with the 2D .0503 particulate standards. The Permittee shall test and submit test results in a permit application within 180 days of permit issuance. The results shall indicate whether CAM is applicable to the two boilers. If it is determined that CAM is applicable, the application shall include compliance specifications. The permit shall be modified accordingly at that time.

It should be noted that the testing that is required for compliance with the CAM schedule noted above will also complete the new testing requirement contained in 2.1 A.1.c. for particulate matter from the boilers. This testing was required by regional office suggestion and is required to be completed within one year of the permit issuance. This condition can be removed from the permit when completed by the facility.

**2. Boiler No. 7 Ash Handling System (ID No. ES04)
Material Handling Operations (ID No. ES05)**

The equipment described above is subject to 15A NCAC 2D .0515 and .0521. These sources are not affected by this permit application; therefore, continued compliance is expected.

**3. Slashing Operations (ID No. ES06)
Coating Operations (ID No. ES07a, b, c, and d)**

The equipment described above is subject to 15A NCAC 2D .0515, .0521, and .0958. These sources are not affected by this permit application; therefore, continued compliance is expected.

4. Calcium Carbonate Silo (ID No. ES20)

This source is currently listed as an insignificant source under the old 15A NCAC 2Q .0102 listings. However, due to the current use of 2Q .0503 for title V facilities this source is no longer considered as exempt. It is subject to both 15A NCAC 2D .0515 and .0521 (20%). The silo is equipped with a fabric filter for particulate matter control. Calcium carbonate is pneumatically conveyed from delivery trucks to the silo, and is screw conveyed from the silo to the processes at the facility. The silo is not equipped with an exhaust fan. As a result, emissions only occur during the silo filling as the calcium carbonate physically displaces air from the silo, and the air used to pneumatically convey the calcium carbonate to the silo is discharged. The silo has a maximum design capacity of 201,400 tons per year (23 tons per hour). This equates to a calculated allowable emission rate of 33.5 pounds per hour. The facility estimates potential emissions after control at 0.10 pounds per hour based on estimated emission rate in grains per dry standard cubic feet and calculated exhaust rates. Compliance with all regulations is expected.

5. Facility Maintenance Woodworking Shop (ID No. ES28)

The woodworking shop consists of various woodworking tools such as saws, planers, drills, etc., connected to a vacuum system that exhausts through a cyclone dust collector. The woodworking shop is used as needed to support facility maintenance activities and is subject to 15A NCAC 2D .0512 and .0521 (20%). 2D .0512 requires that adequate duct work and adequately designed collectors be operated. The facility's use of the woodworking shop is limited in actual hours of operation. It is estimated that approximately 13 pounds of particulate is generated (potential). A conservative control efficiency of 85% is applied to the cyclone. This equates to an estimated emission rate of 2 pounds per hour (8.76 tons per year). Compliance with all regulations is expected.

VII. Multiple Emission Source Limits

The facility currently operates under multiple emission source limits for volatile organic compounds; specifically 15A NCAC 2D .0958, Work Practice Standards. This permit application does not affect this requirement. Continued compliance is expected.

VIII. MACT Applicability and Requirements

The facility is classified as a major source for all criteria pollutants; except carbon monoxide and lead. Based on potential emissions, the facility could also be classified as major for hazardous air pollutants (HAP); however, the Elkin facility requests that the new title V permit contain federally enforceable permit conditions to ensure that the facility-wide HAP emissions remain below major source thresholds.

Therefore the following requirements have been added to the permit in order to remain classified as a minor source for HAPs and avoid the applicability of maximum achievable control technology requirements:

Monitoring [15A NCAC 2Q .0508(f)]

In order to assure compliance, the Permittee shall:

- i. limit the total amount of coal fired in boilers (**ID Nos. ES02 and ES03**) in any 12-month period to 16,000 tons;
- ii. track facility-wide emission rates of all HAPs on a monthly basis and maintain a 12-month rolling HAP total for each HAP emitted from the facility;
- iii. calculate HAP emissions from all combustion sources using AP-42 emission factors and the actual fuel usage on a monthly basis;
- iv. calculate HAP emissions from all coating operations using material usage rates on a monthly basis, manufacturer MSDS, and assuming ALL volatile organic HAPs contained in the materials are emitted to the atmosphere; and
- iv. calculate HAP emissions from all dyeing operations using material usage rates on a monthly basis, manufacturers MSDS, and assuming that only five (5) percent of all volatile organic HAPs contained in the materials are emitted to the atmosphere from the closed vessels.

Recordkeeping [15A NCAC 2Q .0508(f)]

The Permittee shall maintain monthly consumption records of each material used containing HAPs as follows:

- i. quantity of individual HAPs in pounds used by the facility each month and for the 12-month period ending on that month,
- ii. quantity of all HAPs in pounds used by the facility each month and for the 12-month period ending on that month,
- iii. all manufacturer's MSDS indicating HAP content of all materials used in all coating and dyeing operations; and
- iv. quantity of fuel usage by the facility each month and for the 12-month period ending on that month.

Reporting [15A NCAC 2Q .0508(f)]

The Permittee shall submit to the Regional Supervisor, Division of Air Quality, each quarter, a report summarizing emissions of HAPs containing the following:

- i. greatest quantity in pounds of an individual HAP used:
 - A. for each month during the quarter, and
 - B. from each 12-month period ending on each month during the quarter using a 12-month rolling average;
- ii. pounds of all hazardous air pollutants used:
 - A. for each month during the quarter, and

- B. for each 12-month period ending on each month during the quarter using a 12-month rolling average; and
- iii. total actual facility-wide fuel usage for each month during the quarter and for each 12-month period ending on each month during the quarter using a 12-month rolling total.

IX. Permit Shield (including non-applicable requirements)

The currently permitted sources are operating per the permit shield in place. 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

There are no PSD issues associated with this permit application.

B. North Carolina Air Toxics

There are no air toxics issues associated with this permit application.

C. 112(g) Case-By-Case Maximum Achievable Control Technology

There are no case-by-case maximum achievable control technology issues associated with this permit application.

D. NSPS

The facility has one 20,000 gallon horizontal No. 2 fuel oil tank (ID No. ES35) which is subject to 15A NCAC 2D .0524 (Subpart Kb). The permit requires that the facility maintain the following records for compliance purposes:

1. the dimensions of the storage vessel; and
2. an analysis showing the capacity of the storage vessel.

Compliance is expected.

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.

The permit was amended to include the most recent general conditions; specifically "newshe34.wpd." Version 34 of the shell conditions adds general condition LL "Reporting Requirements for Non-operating Equipment".

XII. Insignificant Activities

This permit renewal/modification removes and adds exempt equipment. The following table lists all activities at the facility.

Emission Source	Exemption Regulation	Applicability to Regulation
Shearing Operations: Two shears (3,000 pounds per hour, each; ID No. IES08)*	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Napping Operations: Two nappers (3,000 pounds per hour, each; ID No. IES09)*	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Piece Dye Operations (ID No. IES12)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Package Dye Operations (ID No. IES16)*	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Drug Room – Size Mixing Operations (ID No. IES22)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Pressurized Dyeing Operations (ID No. IES23)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Taslan Operations – Yarn Texturing (ID No. IES25)*	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Propane fired Sanasoft Range (2.0 million Btu per hour maximum heat input; ID No. IES27)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
400 kW emergency generator with 350 gallon diesel tank (ID No. IES30)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
215 HP emergency fire pump with 350 gallon diesel tank (ID No. IES31)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Coal Crusher (ID No. IES32)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Batch drop operations coal drop from delivery trucks (fugitive emissions) (ID No. IES33)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Propane fired burn-out oven (0.308 million Btu per hour maximum heat input; ID No. IES34)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Nylon extruders (four production extruders, 72.5 pounds per hour each; and one sample extruder, 47.5 pounds per hour; ID No. IES36)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Three hot water heaters (0.99 million Btu per hour maximum heat input, each; ID No. IES37)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Weave 3 Building – Abington Clean up ID No. IES40	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
250 gallon waste oil tank (truck maintenance shop; ID No. IES41)	15A NCAC 2Q .0503(8)	Criteria pollutants less than 5 tons per year, HAPs less than 1000 pounds per year
Maintenance, upkeep, and replacement activities (ID No. IES42)	15A NCAC 2Q .0102(c)(1)(A)(i-vi)	
Laboratories activities (ID No. IES43)	15A NCAC 2Q .0102(c)(1)(C)(i-iv)	
Miscellaneous fuel oil storage tanks (ID No. IES44)	15A NCAC 2Q .0102(c)(1)(D)(i)	
Miscellaneous activities and equipment (ID No. IES45)	15A NCAC 2Q .0102(c)(1)(L)(i-xii)	

Note 1. Shaded equipment above represents either new insignificant emission sources or previously not identified sources and have been added to the equipment list in this permit application (8600006.02B).

Note 2. The astericked sources (*) represent sources that have been modified in this permit application (8600006.02B).

XIII. Public Notice

Per 15A NCAC 2Q .0513, permits being renewed are subject to the procedural requirements of this Section (2Q .0500), including those for public participation and affected State and EPA review. Therefore, 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 public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA.

XIV. Recommendations

Regional Comments:

Winston-Salem Regional Office (WSRO) agrees with the recommendation that this permit renewal/modification be issued with the following items (as described in their 06/06/2002 inspection report) being addressed:

1. *The facility should apply to remove any permanently disabled or permanently removed equipment from its Title V Air Permit when it is time to renew the permit.*

This permit application does address the removal of all equipment that is no longer at the facility or permanently inoperable.

2. *All but two of the facility's five boilers are inoperable. Now that most of the town of Elkin has natural gas service, Mr. Fritz said that it was the intention of his company to convert the two remaining operable boilers away from coal fuel to natural gas/No. 2 fuel oil backup within 12-18 months (of this report). These changes could possibly change the facility's classification from Title V to Synthetic Minor or Small, and that the company would be well advised to seek a classification change when it applied to modify the boilers on the facility's Air Permit.*

The fuel switch has not been addressed in this permit action; therefore, see No. 3 below.

3. *Boiler No. 7 (ID No. ES03) was observed in operation with 15-20% visible emissions indicating compliance with 2D .0521 (20% opacity limit). However, given how close the boiler's actual VE were to its limitation and also given the age of the multicyclones (ID Nos. CD03a and b) controlling its particulate emissions, there is a strong possibility that this boiler will not meet the particulate standard set out in 2D .0503. Its proper maintenance and its operation as permitted indicate that the boiler should be in compliance with 2D .0503 and .0516. However, it is the recommendation of the inspector that a stack testing requirement be added to this facility's Title V Air Permit for this boiler at its upcoming renewal if the facility does not convert the boiler's fuel from coal to natural gas/No. 2 fuel oil.*

Because the fuel switch was not requested, a testing condition has been added to the permit for boiler No. 3 and boiler No. 7. The testing condition requires that the test be completed and the results submitted for analysis within one year of this permit issuance.

Facility Comments:

1. Comment: The equipment table should have the following clarifications: ES04a and ES04b-clarify the control device orientation; ES06-correct the process rate; ES07a, ES07c, and ES07d-correct the process rate; and ES07b-correct the process rate.

Response: Agree, all changes have been made as suggested.

2. Comment: 2.1 A.1.c-Clarify the permit shell text to include “particulate matter.”
Response: Disagree, language is not in current shell and is not needed for clarity.
3. Comment: 2.1 A.2.e.iv-clarify that responsible official certification of coal records are to be included as part of the semi-annual report.
Response: Agree, change has been made as suggested.
4. Comment: 2.1 A.3.b-correct typo of missing language.
Response: Agree, change has been made as suggested.
5. Comment: 2.1 A.4.a.iii-The CAM language requires the Permittee to submit an application to re-open and modify the Title V permit 90 days following completion of the stack testing. The facility is also anticipating reopening the permit to incorporate the changes resulting from the permit to construct. They would like to have the flexibility to accomplish both of these modifications at the same time.
Response: Disagree, the requirement to complete the testing and submit the results in the form of a permit application has been retained. Testing will determine if CAM is applicable to the facility. If it is the facility is required to supply a proper CAM plan for insertion in the permit. If CAM does not apply to the two boilers, the permit will be modified to remove the CAM schedule as drafted. The modification of the facility in a second permit application already in-house is independent of this activity.
6. Comment: 2.1 B-correct the equipment descriptions to correctly identify equipment/control device linkage.
Response: Agree, change has been made as suggested.
7. Comment: 2.1 D, 2.1 E, and 2.1 F-correct the equipment descriptions to correctly identify equipment/control device linkage and correct process rates.
Response: Agree, changes have been made as suggested.
8. Comment: 2.1 F.4-add language regarding maintenance MSDS for materials used on this emissions unit.
Response: Agree, change will be made as suggested.
9. Comment: 2.2 A.1.a.iv-amend language to reflect similar language in permit of facility’s sister plant in regards to the work practice standards for fabric rags. See permit 06115R07 for language.
Response: Agree, change has been made as suggested
10. Comment: 2.3-delete section as the facility is not subject to RMP.
Response: Agree, change has been made as suggested.