

## AIR PERMIT REVIEW

APPLICANT Edenton Dyeing and Finishing, LLC (Piece Dye Acquisition Corporation)		SITE LOCATION Edenton	COUNTY Chowan
CONTACT Harold W. Lloyd, Jr. Technical Director		PHONE (252) 221-4121	
APPLICATION FOR Renewal and ownership/name change		Existing P/N 02621T13	
APP No. 2100051.02A	REVIEWER Jenny Sheppard	SIGNATURE	DATE February 17, 2003
RECOMMENDATION and COMMENT Issue Permit # 02621T14			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 (02621T13) was issued on December 19, 1998 and is currently scheduled to expire on November 30, 2002. The renewal application was received on March 1, 2002 approximately nine months prior to the expiration date. 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.

On September 13, 2002 Piece Dye Acquisition Corporation submitted an application for ownership change and will be processed with the renewal. The owners will be Edenton Dyeing and Finishing, LLC.

### 2. Facility Description

Edenton Dyeing and Finishing, LLC (Piece Dye Acquisition Corporation) finishes broadwoven fabrics and cotton. The facility consists of two separate plants: 1) acrylic yarn manufacturing and 2) dyeing. There is no weaving or cloth manufacturing at this facility. The yarn is manufactured and then shipped off-site. The facility also houses a screen printing operation. This facility is a Title V facility because potential sulfur dioxide emissions from the three natural gas/No. 6 oil-fired boilers are greater than 100 tons per year.

### 3. Application Chronology

**March 1, 2002** - Air permit application was received by the Division of Air Quality (DAQ), Washington Regional Office (WARO). Permit application was considered complete as of April 8, 2002.

**March 15, 2002** - Central Office received renewal request from WARO.

**July 2002** - Telecon with Bud Powell of Piece Dye discussing plant closure possibly as early as August. (facility never followed up with letter)

Edenton Dyeing and Finishing, LLC  
 (formerly Piece Dye Aquisition Corporation)  
 XXXX XX, 2003

September 13, 2002 - WARO received request for ownership change.

October 17, 2002 - Central Office resumes processing of renewal request.

November 18, 2002 - Central Office received request for ownership change from WARO.

December 16, 2002 - Central Office telcon with region concerning request for ownership change from Piece Dye Aquisition Corporation. Discuss with Ann Hamby of WARO how they would like to proceed.

December 16, 2002 - Central Office telcon with region concerning request for ownership change from Piece Dye Aquisition Corporation. Discuss with J.P. Chauhan of WARO how they would like to proceed. J.P. Chauhan of WARO is looking into the situation and will notify CO of their descision.

February 11, 2003 - Central Office telcon with J.P. Chauhan of WARO concerning compliance with the permit since the facility had not sent in the compliance reports required by permit.

February 12, 2003 - Meeting with Betty Gatano of Stationary Source Compliance to relay information concerning this facility.

February 12, 2003 - Meeting with Mike Aldridge, Supervisor of Stationary Source Compliance to relay information concerning this facility.

March 7, 2003 - Discussion with WARO concerning testing boilers. Only coal firing boilers would be tested.

#### 4. Permit Modification/Changes

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

Old Page No.	New Page No.	Condition No.	Change
Cover letter	Cover letter		Change of ownership and name
Page 1	Page1		Change of ownership and name
Page 5 through 25		Part I Section 2.1, 2.2, and 3	Changed to current format and wording and updated all permit language

#### 5. Regulatory Review

The facility is subject to the following regulations:

Edenton Dyeing and Finishing, LLC  
(formerly Piece Dye Acquisition Corporation)  
XXXX XX, 2003

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 .0530 “Prevention of Significant Deterioration”  
2D .0958 “Work Practices for Sources of Volatile Organic Compounds”  
2D .0501(e) “Compliance with Emission Control Standards”  
2D .0402 “Ambient Air Quality Standards - Sulfur Oxides”

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal). However, a review of the potential particulate emission rate for the coal-fired boiler was evaluated for CAM applicability. Since the facility has a PSD Avoidance condition limiting the particulate emission rate for all three boilers to 48.11 tons per year, CAM does not apply.

## **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 not currently subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP). Once promulgated the facility may be subject to the Fabric Coating, Printing and Dyeing NESHAP (40 CFR 63 Subpart OOOO) and the Industrial Boiler MACT. The Screen Printing applicability will fall under the Fabric Coating Subcategory of the Fabric Coating, Printing and Dyeing Source Category which was proposed July 11, 2002.

### **PSD**

This facility is a major Prevention of Significant Deterioration (PSD) source.

### **Attainment Status**

This facility is located in Chowan 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 not apply since there is a federally enforceable condition limiting the emission rate.

## **7. Facility Wide Air Toxics**

Edenton Dyeing and Finishing, LLC  
(formerly Piece Dye Acquisition Corporation)  
XXXX XX, 2003

The facility has had no modifications of sources that would trigger a toxics evaluation.

## **8. Facility Compliance Status**

The facility was inspected on September 28, 2000 by Edward Childs, WARO. The facility was considered to be in compliance with all applicable requirements at the time of inspection. Facility received an NOV for failure to keep records for the following specific conditions in p/n 02621T13:

- 2.1.B.1.d Coal Boiler Multicyclone inspection
- 2.1.C.3.d VE from Boiler B-3
- 2.1.D.1.d Ash/Coal System Baghouse monthly inspections
- 2.1.E.3.e VE from tenter frames
- 2.1.F.3.e VE from tenter frames

## **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 for this renewal.

## **11. Stipulation Review**

All stipulations are standard for this type of facility.

Based on information obtained from the EPA, the Screen Printing applicability will fall under the Fabric Coating Subcategory of the Fabric Coating, Printing and Dyeing Source Category. This MACT was proposed on July 11, 2002 with promulgation tentatively scheduled a year later. The EPA contact is Mr. Vinson Hellwig, EPA/OAQPS/ESD/CCPQ, and his telephone number is (919) 541-2317.

## **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. There are no affected States for this facility.

Edenton Dyeing and Finishing, LLC  
(formerly Piece Dye Acquisition Corporation)  
XXXX XX, 2003

### **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.

WARO recommends issuance of the permit per telcon with J.P. on March 31, 2003

RCO concurs with WARO's recommendation to issue air permit.

**File path and name** C:\TEMP\02621T14.REV