

AIR PERMIT REVIEW

APPLICANT	SITE LOCATION	COUNTY	
J. Charles Sanders Company	Gastonia, North Carolina	Gaston	
CONTACT	PHONE		
J. Charles Saunders	704-866-9156		
APPLICATION FOR:		Existing P/N	
Permit Renewal	06610T03		
APP. NO.	REVIEWER	SIGNATURE	DATE
3600219.02C	Mike Benson		January 6, 2004
RECOMMENDATION AND COMMENT		FEE CLASS	
Issue P/N 06610T04		Title V	

1. Purpose of Application:

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (06610T03) was issued on May 15, 1998, and is currently scheduled to expire on April 30, 2003. The renewal application was received on July 31, 2002, or at least 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.

2. Facility Description

This is a textile facility that spins nylon and cotton-poly thread. After the thread spinning operation some types of thread are immersed in a nylon/methanol bath to coat the thread with additional nylon. The coated thread is then passed through an electric oven to cure the nylon coating. VOCs are driven off the coated thread and the coating is polymerized with the heat of the electric ovens. Typical operation is 2000 hours per year.

3. Application Chronology/History

May 15, 1998 – First time title V permit 06610T02 issued.

February 14, 2002 – Request for an administrative amendment to the original Title V permit received from the Mooresville Regional Office. This request was to change the visible emissions monitoring from daily to monthly.

February 27, 2002 – Permit 06610T03 issued.

February 5, 2004 – Permit transferred to this engineer.

4. New Equipment/Change in Emission and Regulatory Review

No new equipment was added or changed during this review. No physical changes have been made at the Company since the initial Title V permit was issued.

The facility is subject to the following regulations:

- 15A NCAC 2D .0503.
- 15A NCAC 2D .0515.
- 15A NCAC 2D .0516.
- 15A NCAC 2D .0521.
- 15A NCAC 2D .0958.
- 15A NCAC 2D .0524 (40 CFR 60, Subpart VVV).

5. Stipulation Review:

All stipulations were reviewed during this renewal. It was determined that no modification to the specific equipment stipulations were needed. The General Conditions were updated for the most current language. The 2D .0521 language for all sources was updated in accordance with Office Policy. The document was converted from WordPerfect to MS-Word.

6. NSPS Issues:

The five nylon/polyester thread bonding machines (ID Nos. F1 through F5) are subject to 40 CFR Part 60, Subpart VVV: "Standards of Performance for Polymeric Coating of Supporting Substrates". The facility has been noted to be out of compliance with this regulation in the past (8/24/01, not reporting estimated emissions), but has since come into compliance.

7. PSD Issues:

This facility is PSD Minor. Gaston County has been triggered for PSD increment tracking for PM10, SO2, and NO2, however, this renewal does not affect PSD increment tracking.

8. MACT Issues:

This facility will be subject to 40 CFR 63, Subpart OOOO and Subpart DDDDD in the future.

9. 112(r) Issues:

This facility is not subject to 112(r).

10. CAM Issues:

This facility is not subject to CAM. (no control devices)

11. Facility Wide Air Toxic Air Pollutants:

This modification did not trigger toxics review. The facility is not currently subject to either 2D .1100 or 2Q .0711. The following TAPs were identified from the Year 2001 Emissions Inventory.

Toxic Air Pollutant	Actual Emissions, pounds/year
benzene	0.008
dichlorobenzene	0.0046
formaldehyde	0.29
hexane	6.8
toluene	0.013

12. Facility Compliance Status/Compliance History:

A review of IMPAQ as well as the physical file history located in the Central Files indicated that this facility has been and continues to operate in compliance with applicable Air Quality regulations since 2002. Previous compliance problems include: warning letter for recordkeeping/reporting (9/99), NOV for annual certification (3/00), NOV for annual certification (2/01), NOV for failure to submit emissions inventory (8/01), and NOV recordkeeping/reporting (9/01).

A statement of annual compliance was received on January 15, 2002 and January 9, 2003, in accordance with General Condition P.

13. Emissions Summary:

Emissions are summarized from the Year 2001 Emissions Inventory.

Pollutant	Actual Emissions (TPY)
CO	0.16
NOx	0.19
PM	0.014
PM10	0.014
PM2.5	0.014
SO2	0.0011
VOC	10.49

The facility is considered to be Title V for having an excess emissions of 10 TPY for a single HAP, methanol.

14. 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. South Carolina is an affected state for this facility.

15. Conclusions, Comments, and Recommendations:

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

MRO recommends issuance of Permit No. 06610T04.

Recommend issuance of Permit No. 06610T04.