

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2009**

**Region:** Washington Regional Office  
**County:** Lenoir  
**NC Facility ID:** 5400189  
**Inspector's Name:** Betsy Huddleston  
**Date of Last Inspection:** 04/17/2008  
**Compliance Code:** C / In Compliance With  
 Procedural Reqr

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> UNIFI Kinston, LLC</p> <p><b>Facility Address:</b>                  UNIFI Kinston, LLC                  4693 Hwy 11 N                  Kinston, NC 28502</p> <p><b>SIC:</b> 2824 / Organic Fibers, Noncellulosic  <b>NAICS:</b> 325222 / Noncellulosic Organic Fiber Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>			<p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 5400189.07B  <b>Date Received:</b> 12/20/2007  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 09427/T05  <b>Existing Permit Issue Date:</b> 01/11/2006  <b>Existing Permit Expiration Date:</b> 10/31/2008</p>
Alan Heltzel Technical Manager - Special Projects (336) 679-3712 7201 West Friendly Avenue Greensboro NC, 27282	Alan Heltzel Technical Manager - Special Projects (336) 679-3712 7201 West Friendly Avenue Greensboro NC, 27282	Alan Heltzel Technical Manager - Special Projects (336) 679-3712 7201 West Friendly Avenue Greensboro NC, 27282	
<b>Review Engineer:</b> Mark Cuilla		<b>Comments / Recommendations:</b>	
<b>Review Engineer's Signature:</b>		<p><b>Issue</b> 09427/T06  <b>Permit Issue Date:</b> <b>date, 2009</b>  <b>Permit Expiration Date:</b> <b>date, 2014</b></p>	
<b>Date:</b> <b>date, 2009</b>			

**I. Purpose of Application**

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**09427T05**) was issued on **January 11, 2006**, and is currently scheduled to expire on **October 31, 2008**. The renewal application was received on **December 20, 2007**, 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.

**II. Facility Description**

The facility produces polyester PET (polyethylene teraphthalate) yarns for clothing and industrial ropes.

It should be noted that the facility has ceased operation as of **October 2007**, but is retaining the permit. In addition, a portion of its currently permitted equipment was purchased from the neighboring DuPont facility. Those purchased pieces have been removed from the renewed permit.

### III. History/Background/Application Chronology

**December 27, 2007** – Permit application **5400189.07B** received for renewal of the current Title V air permit. Application was deemed complete for processing.

**March 4, 2008** – Received email from Vanish Green, Site Manager of Unifi requesting that the following sources be removed from the permit as they have been transferred to Dupont:

- I5001** – one 150,000 gallon storage tank
- I5002** – one 150,000 gallon storage tank
- I5005** – one 300,000 gallon storage tank
- ES5008** – one 65,000 gallon storage tank
- ES5026** – one 30,000 gallon retention tank

**July 17, 2008** – Received verification from Erika Craig, Environmental Manager, Unifi requesting that the following sources be removed from the permit as they have been transferred to DuPont:

- ES6009 through ES6012** – Four Dowtherm vaporizers
- ES6022A** – One 208 million Btu per hour boiler
- ES6022B** – One 208 million Btu per hour boiler
- ES6024** – One flyash ash silo and pneumatic transfer system
- ES6029** – One wastewater treatment pond
- ES6031, ES6032 and ES6034** – Three Dowtherm vaporizers
- I6013 through I6017 and I6019** – Six fuel tanks
- I6020** – One ammonium hydroxide tank
- IFP1** – One diesel tank
- IFP2** – One diesel tank
- ICL** – Chemistry lab
- TPA1WW** – One organic air-stripping column
- TPA2WW** – One organic air-stripping column

**September 9, 2008** – DRAFT permit sent to Permittee, Title V Coordinator, and Regional Office for comment prior to public notice and EPA review periods. The Permittee provided additional comments to the draft on **January 12, 2009**. The major comment was the request to remove all sources listed under utilities; specifically the one remaining boiler (**ID No. ES6023**) and the three remaining Dowtherm vaporizers (**ID Nos. ES6006 through ES6008**). The remaining comments all reflected corrections as a result of removing these sources.

**Date, 2008** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

#### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description of Change
Attachment	Insignificant Activities	-removed equipment per Permittee request
Cover	-	-amended permit revision numbers and all dates
TOC	-	-removed reference to Part II
All	Header	-amended permit revision number
5	Equipment table	-removed equipment per Permittee request
6-7	2.1 A (table)	-added ID Nos. where needed -added reference to CAM
8	2.1 A.1.a	-added ID Nos.
11-12	2.1 B (table)	-added ID Nos. where needed -added reference to CAM
12	2.1 B.1.a	-added ID Nos.
15	2.1 C (table)	-corrected rule citation and cross reference
16	2.1 C.1.a 2.1 C.1.b 2.1 C.1.c 2.1 C.1.d 2.1 C.2.a 2.1 C.2.b	-added ID Nos. -corrected rule citation -updated shell language -added “no reporting” language -added ID Nos. -corrected rule citation
16-17	2.1 C.2.c	-added ID Nos. and updated shell language
18	2.1 D (table)	-added ID Nos. where needed -added reference to CAM
19	2.1 D.1.a 2.1 D.1.b 2.1 D.1.c	-added ID Nos. -corrected rule citation -added ID Nos. and updated shell language
20	2.1 D.2.a 2.1 D.2.b 2.1 D.2.c	-added ID Nos. -corrected rule citation -added ID Nos. and updated shell language
21-22	2.1 E (table)	-added ID Nos.
22	2.1 E.1 2.1 E.2.a	-added ID Nos. -added ID Nos.
23	2.1 E.2.c	-corrected cross reference
25	2.2 A (table) 2.2 A.1	-consolidated table entries -corrected rule citation
33	2.2 A.2 2.2 A.3	-corrected rule citation -corrected rule citation
36	2.2 A.4	-corrected rule citation
37	2.2 A.5	-corrected rule citation
39	2.2 B.1.b 2.2 B.1.e	-updated shell language -updated shell language
40	2.2 C.1 2.2 C.1.b 2.2 C.1.f	-corrected rule citation -corrected rule citation -amended reporting requirement from quarterly to semiannual

Page	Section	Description of Change
41	2.2 D.1 2.2 D.1.b 2.2 D.1.f	-corrected rule citation -corrected rule citation -amended reporting requirement from quarterly to semiannual
42	2.2 E 2.2 E.1	-renumbered Section with removal of old 2.2 E -corrected rule citation
42-43	2.2 E.1 (table)	-removed equipment and associated modeled emission rates
44	2.2 F 2.2 G	-added Section for 15A NCAC 2Q .0705 compliance -added Section for future CAM demonstration submittals
45-55	General Conditions	-updated shell conditions (v2.22.1)
56	Attachment	-updated shell list of Acronyms

The following table indicates the modifications to ESM as a result of this permit renewal:

Current Description	Change resulting from permit renewal
Three virgin ethylene glycol storage tanks (150,000; 150,000; and 300,000 gallons respectively; <b>ID Nos. I5001, I5002, and I5005</b> )	End-dated per Permittee request
Two gasoline tanks (550 gallons each; <b>ID Nos. I6013 and I6014</b> )	End-dated per Permittee request
kerosine tank (550 gallons; <b>ID No. I6015</b> )	End-dated per Permittee request
Three diesel fuel tanks (500, 500, and 400 gallons respectively; <b>ID Nos. I6016, I6017, and I6019</b> )	End-dated per Permittee request
Ammonium hydroxide tank ( <b>ID No. I6020</b> )	End-dated per Permittee request
Chemistry laboratory ( <b>ID No. ICL</b> )	End-dated per Permittee request
Two 500 gallon diesel tanks for fire pumps ( <b>ID Nos. IFP1 and IFP2</b> )	End-dated per Permittee request
One TPA2 process water retention tank for organic stripper (30,000 gallons; <b>ID No. ES5026</b> )	End-dated per Permittee request
One recycle ethylene glycol storage tank ( <b>ID No. ES5008</b> )	End-dated per Permittee request
Two organic air stripping columns ( <b>ID Nos. TPA1WW and TPA2WW</b> )	End-dated per Permittee request
One wastewater treatment pond ( <b>ID No. ES6029</b> )	End-dated per Permittee request
One natural gas/No. 4/No. 6 fuel oil/coal-fired boiler (208 million Btu per hour maximum heat input capacity; No. 1; <b>ID No. ES6022A</b> )	End-dated per Permittee request
One natural gas/No. 4/No. 6 fuel oil/coal-fired boiler (208 million Btu per hour maximum heat input capacity; No. 2; <b>ID No. ES6022B</b> )	End-dated per Permittee request
One flyash ash silo and pneumatic transfer system with collection cyclone ( <b>ID No. ES6024</b> )	End-dated per Permittee request
One natural gas/No. 4/No. 6 fuel oil-fired Dowtherm vaporizer (15.7 million Btu per hour maximum heat input capacity; No. 4; <b>ID No. ES6009</b> )	End-dated per Permittee request

<b>Current Description</b>	<b>Change resulting from permit renewal</b>
Three natural gas/No. 4/No. 6 fuel oil-fired Dowtherm vaporizers (20 million Btu per hour maximum heat input capacity each; Nos. 5, 6, and 7; <b>ID Nos. ES6010, ES6011, and ES6012</b> )	End-dated per Permittee request
Three natural gas/No. 2/No. 4/No. 6 fuel oil-fired Dowtherm vaporizers (23.42 million Btu per hour maximum heat input capacity each; Nos. 8, 9, and 10; <b>ID Nos. ES6031, ES6032, and ES6034</b> )	End-dated per Permittee request
Dowtherm vaporizers ( <b>ID No. CDO5C</b> )	End-dated per Permittee request
One multicyclone (160 six-inch tubes; <b>ID No. CD6022A</b> )	End-dated per Permittee request
One side stream fabric filter (3,318 square feet of filter area; <b>ID No. CD6022B</b> )	End-dated per Permittee request
One multicyclone (1,080 three-inch tubes; <b>ID No. CD6022C</b> )	End-dated per Permittee request
One fabric filter (47,104 square feet of filter area; <b>ID No. CD6022D</b> )	End-dated per Permittee request
One fabric filter ( <b>ID No. CD6024</b> )	End-dated per Permittee request
Three natural gas/No. 4/No. 6 fuel oil-fired Dowtherm vaporizers (20, 20, and 12.9 million Btu per hour maximum heat input capacity, respectively; <b>ID Nos. ES6006 through ES6008</b> )	End-dated per Permittee request
One natural gas/No. 4/No. 6 fuel oil-fired boiler (197 million Btu per hour maximum heat input capacity, No. 3; <b>ID No. ES6023</b> )	End-dated per Permittee request
Y4 four spinning machines ( <b>ID No. Y4SM</b> )	Four spinning machines ( <b>ID No. Y4SM</b> )

## V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds  
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart DDD)  
15A NCAC 2D .1100, Control of Air Toxics  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart JJJ)  
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for these existing requirements will not be included in this document.

However, as a result of this permit renewal, the following regulations have been added:

15A NCAC 2D .0614, Compliance Assurance Monitoring  
15A NCAC 2Q .0705, Existing Facilities and SIC Calls

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – The Permittee is subject to the following New Source Performance Standard per 40 CFR 60 as follows:

**Subpart DDD (NSPS for VOCs from the Polymer Manufacturing Industry)** – This Subpart limits the ethylene glycol concentration of the water from the steam jet vacuums used for the polymerizer reactors (**ID Nos. Y6A1, Y6B1, Y7A1, Y7B1, ES4057A and ES4057B**) of Y6 and Y7 respectively, to less than 0.35 percent by weight (14-day rolling average). The Permittee shall ensure compliance with this requirement using procedures that conform to the methods described in ASTM D2908-74 or 91 “Standard Practice for Measuring Volatile Organic Matter in Water by Aqueous Injection Gas Chromatography.” The Permittee is required to perform daily measurements and daily average 14-day rolling average calculations as well as submit semi-annual reports. This permit renewal does not affect the status of these requirements.

It should be noted that the current permit lists three Dowtherm vaporizers (**ID Nos. ES6031, ES6032, and ES6034**) as being subject to Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The permit limits the maximum sulfur content of any fuel oil received and burned in these sources to less than 0.5 percent by weight. However, with the transfer of ownership of these sources from Unifi to DuPont, these sources are being removed from this permit at renewal. Therefore, Subpart Dc no longer applies to this facility at this time.

**NESHAPS/MACT** – The facility is subject to 40 CFR 63, Subpart JJJ “National Emission Standards for Hazardous Air Pollutant Emissions from Group IV Polymers and Resins”. Specifically as follows:

1. Section 2.1 A.1 limits organic HAP emissions from all process vents containing greater than 0.005 weight percent total organic HAP from continuous unit operations associated with the esterification vessels in the collection of raw material preparation sections to no greater than 0.04 kilogram organic HAP per megagram of PET produced from all associated thermoplastic polymer production units;
2. Section 2.1 B.1 limits organic HAP emissions from all process vents containing greater than 0.005 weight percent total organic HAP from continuous unit operations in the collection of polymerization reaction sections and ethylene glycol recovery sections to no greater than 0.02 kilogram organic HAP per megagram of PET product, as a whole, from all associated thermoplastic polymer production units;
3. Section 2.1 E.1 requires that the Permittee maintain records of each process unit with a wastewater stream, each stream identification code indicating reference to the description of the contributing unit and other data pertaining to its group determination, and flow weighted total annual average concentration of acetaldehyde and 1,4 dioxane in parts per million, by weight, at the point of determination for each wastewater stream; and
4. Sections 2.2 A.1 through A.5 requires that the Permittee comply with the general recordkeeping and reporting provisions, maintenance wastewater requirements, heat exchanger requirements, equipment leak provisions, and startup/shutdown/malfunction requirements, respectively.

This permit renewal does not affect the status of any of these specific Sections except to remove equipment that is no longer operated by the Permittee (transferred to DuPont).

**PSD** – The Permittee is subject to two separate PSD Avoidance conditions. In each case (Sections 2.2 C and D), in order to avoid the applicability of 15A NCAC 2D .0530, volatile organic compound emissions from emission sources of polymerization lines Y6 and Y7, respectively, including emissions from TPA2 esterification sources, TPA2 esterification process water sources, and TPA2 wastewater sources that are attributable to polymerization line Y6 production, must be less than 40 tons per year. The Permittee shall calculate monthly VOC emissions from esterification, polymerization, and wastewater for a total production of PET derived from raw materials entering the process and used in Lines Y6 and Y7, respectively. The emissions estimates may be based on known concentrations and flow rates of VOCs or documented emission factors for the processes involved. The Permittee is also required to keep records and submit reporting. This permit renewal does not affect the status of these requirements. However, as part of the renewal process the current quarterly reporting requirements have been modified to semi-annual per current procedures.

**112(r)** – The facility is not subject to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater than the applicability threshold. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table identifies all emission equipment/control device relationships:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control/Recovery Device Description</b>
<b>PET Esterification TPA1</b>			
ES4091 ES4092	Two slurry mix tanks (Nos. 1 and 2)	CD4048	One TPA1 vent seal tank/direct contact condenser
ES4093	One slurry feed tank		
ESTPA1	One esterification reactor with ethylene glycol/water separation column with reflux condenser		
TPA1R2G	One ethylene glycol/water separation column bottoms (glycol) receiver; 12,000 gallons		
<b>PET Polymerization Y4</b>			
Y4A1	One up flow prepolymerizer with ethylene glycol jet condenser	RDY4A	One ethylene glycol spray condenser venting to steam jet hotwell
Y4B1	One finisher with ethylene glycol jet condenser	RDY4B	One ethylene glycol spray condenser venting to steam jet hotwell
<b>PET Esterification TPA2</b>			
ES4079 ES4080	Two slurry mix tanks (Nos. 3 and 4)	CD4060	One TPA2 vent seal tank/direct contact condenser
ES4081	One slurry feed tank		
ESTPA2	One esterification reactor with ethylene glycol/water separation column/reflux condenser and drum/bottoms receiver TPA2R2G		

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control/Recovery Device Description
<b>PET Polymerization Y6</b>			
Y6A1	One up flow prepolymerizer with ethylene glycol jet condenser	RDY6A	One ethylene glycol spray condenser venting to steam jet hotwell
Y6B1	One finisher with ethylene glycol jet condenser	RDY6B	One ethylene glycol spray condenser venting to steam jet hotwell
<b>PET Polymerization Y7</b>			
Y7A1	One up flow prepolymerizer with ethylene glycol jet condenser	RDY7A	One ethylene glycol spray condenser venting to steam jet hotwell
Y7B1	One finisher with ethylene glycol jet condenser	RDY7B	One ethylene glycol spray condenser venting to steam jet hotwell
<b>Materials Handling</b>			
ES5014C ES5014D	Two Toner/ethylene glycol mix tanks Nos. 1 and 2 with pneumatic transfer cyclone 5014	CD5014	One fabric filter (107.5 square feet of filter area)
ES5014A ES5014B	Two Toner scales Nos. 1 and 2 with pneumatic transfer cyclone 5014		
ES5018	One titanium dioxide pneumatic transfer system	CD5018	One fabric filter (451 square feet of filter area)

As the facility is currently idle (as of **October 2007**), a CAM demonstration is not needed at this time. The permit will be renewed with a requirement that the Permittee perform a complete CAM analysis for each piece of equipment that is currently being controlled as it is restarted. This analysis shall be performed within 30 days of start up of the equipment and include all relevant operating conditions for that equipment and control device in order to determine applicable indicators (if CAM is applicable). Section 2.2 G has been added as follows:

**G. Facility Wide Affected Sources**

**1. 15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING**

- a. *Within 30 days of startup of equipment, the Permittee shall submit an administrative amendment to this permit including the requirements of this Rule for each pollutant-specific emissions unit at the facility required to obtain a permit under 15A NCAC 2Q .0500 if the unit satisfies all of the following criteria:*
  - i. *the unit is subject to an emission limit or standard for the applicable regulated air pollutant;*
  - ii. *the unit uses a control device to achieve compliance with any such emission limitation or standard; and*
  - iii. *the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 tons per year.*

*The permit application shall contain all of the items contained in the North Carolina Department of Environment and Natural Resources/Division of Air Quality Compliance Assurance Monitoring (CAM) Plan (Form E6) for each control device meeting all of the criteria above. Otherwise, the Permittee shall submit written notification within 10 days of startup and a determination of why CAM does not apply to the equipment.*

## **VII. Facility Wide Air Toxics**

The majority of the equipment at the facility is subject to modeled emission rates from a combined modeling exercise with its neighbor, DuPont. The combined modeling that was completed was for all emitted toxics and included the combustion sources. This permit renewal does not affect this status except to remove equipment listing from the table that has been confirmed to be transferred to DuPont for operation.

However, it has been determined that the source-by-source modeled emission rates in the permit do constitute modeling in compliance with 15A NCAC 2Q .0705, Existing Sources and SIC Calls. As noted above, the facility is required to comply with the MACT for Group IV Polymers and Resins (40 CFR 63, Subpart JJJ). It has been determined that this is the last applicable MACT for this facility, excluding any eventual MACTs for combustion sources. As such, the facility should have been in compliance with NC Air Toxics by the same deadline it was required to be in compliance with the MACT (**June 19, 2001** for existing sources – 40 CFR 63.1311(c)). Betsy Huddleston of the WARO has noted, *“the permit has had facility-wide toxics limitations for a very long time (at least 10 years). Because of that, I would think that would auto-qualify as compliance with the last MACT toxics demo.”* This is further supported by a record check by the WARO. It was determined that prior to 1997, the once combined facility of DuPont and Unifi (formerly Invista), was issued a facility-wide “bubble” toxics permit containing one facility-wide limit per pollutant. The permit stayed this way until a revised facility-wide worse case scenario was modeled (~October 2001). The permit was separated into two in 2003 (DuPont and Invista). Subsequently, the Invista portion of the permit was transferred to Unifi. Each permit retained their respective facility-wide worse case modeled emission rates. These rates have not been modified, except for updating ethylene oxide rates, since that time. As noted above, this permit renewal does not affect this status except to remove those limits for the sources Unifi no longer operates. The renewed permit has been modified in Section 2.2 F to include the following last MACT/air toxics language:

### ***F. Facility-wide affected sources***

#### ***State-enforceable only***

##### ***1. 15A NCAC 2Q .0705: EXISTING SOURCES AND SIC CALLS***

- a. As of 1997, as amended October 2001 and July 2007, emissions of toxic air pollutants have been demonstrated on a facility-wide basis (excluding those sources exempt under 15A NCAC 2Q .0702 “Exemptions”) that each of the toxic air pollutants (TAPs) emitted from all sources at the facility are either below its respective toxic permit emission rates (TPER) listed in 15A NCAC 2Q .0711 “Emission Rates Requiring a Permit” or the TAPs are in compliance with 15A NCAC 2D .1100 “Control of Toxic Air Pollutants” as described in Section 2.2 E above.*
- b. The facility shall be operated and maintained in such a manner that any new, existing or increased actual emissions of any TAP listed in 15A NCAC 2Q .0711 or in this permit from all sources at the facility (excluding those sources exempt under 15A NCAC 2Q .0702 “Exemptions”), including fugitive emissions and emission sources not otherwise required to have a permit, will not exceed its respective TPER listed in 15A NCAC 2Q .0711 without first obtaining an air permit to construct or operate.*

- c. *PRIOR to exceeding any of the TPERs listed in 15A NCAC 2Q .0711, the Permittee shall be responsible for obtaining an air permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 “Control of Toxic Air Pollutants”.*
- d. *The Permittee shall maintain at the facility records of operational information sufficient for demonstrating to the Division of Air Quality staff that actual TAPs are less than the rate listed in 15A NCAC 2D .1100.*

**VIII. Facility Emissions Review**

There is no change in emissions for this renewal.

The following table represents the latest years emission inventory from the facility as compared to the potential emissions for the same pollutant:

<b>Pollutant(s)</b>	<b>2006 Actual Emissions (tpy)</b>	<b>2007 Actual Emissions (tpy)</b>
CO	91.59	95.29
NO <sub>x</sub>	237.75	205.40
PM <sub>10</sub>	41.34	15.71
SO <sub>2</sub>	638.06	500.10
VOC	64.62	36.46
Total HAPs/TAPs	66.45	55.92

**IX. Stipulation Review**

In her **April 17, 2008** inspection report summary, Betsy Huddleston, of the WaRO did not note any required permit modifications and commented that Unifi appeared to be in compliance with the conditions of its permit at the time of the inspection.

**X. Public Notice/EPA and Affected State(s) Review**

Pursuant to 15A NCAC 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 15A NCAC 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. There are no affected States or Local Programs within 50 miles of this facility.

**XI. 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 and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WaRO’s recommendation to issue the renewed air permit.