

Facility Name: **FiberVisions Manufacturing Company**
City: Covington
County: Newton
AIRS #: 04-13-217-00020

Application #: TV-42831
Date Application Received: March 23, 2017
Permit No: 2824-217-0020-V-04-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: FiberVisions Manufacturing Company

2. Parent/Holding Company Name

FiberVisions Corporation

3. Previous and/or Other Name(s)

Hercules – Oxford

FiberVisions, Inc

4. Facility Location

7101 Alcovy Road
Covington, GA 30014

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2824-217-0020-V-03-0	9/25/2012	Title V Permit renewal
Off-Permit Change	1/11/2013	Process a new plastic product at lines 15 and 16 using existing equipment and adding new equipment (dryer, crystallizer, material transfer equipment) upstream.
2824-217-0020-V-03-1	12/11/2015	The installation and operation of a 41.8 MMBtu/hr Boiler No. 5.

D. Process Description

1. SIC Codes(s)

SIC Code: 2824

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility's operations include thermal extrusion of synthetic fiber, which is finished to customer specifications.

3. Overall Facility Process Description

This facility consists of the following: Powerhouse, Plant I, and Plant II.

Powerhouse

Steam for process use and space heating is generated by four boilers. All the boilers are equipped to use natural gas or No. 2 fuel oil.

Plant I consists of the following operations:

Flake unloading: Thermoplastic (generally in the form of flake or pellets) is unloaded from railcars and/or truck tankers pneumatically by negative air pressure. Flake and air are separated and the air is vented to the atmosphere. The flake is then fed into a positive pressure conveying air stream and into the storage silos

Additives/Colorant Blending: Fourth and fifth floor operations prepare colorant/flake and stabilizer/flake concentrates. Portions of the colorant and stabilizer blends plus additional flake are weighed and added to blender bodies located on the fourth floor. The blender bodies are rotated to mix the ingredients and are then placed at the feed stations, which are directly over the extruders on the third floor. The spills of polymer or dry additives on the fourth and fifth floors are vacuumed up by a central vacuum system. Conveying air is separated and vented.

Spinning: Flake blend from blender bodies located on the fourth floor flows by gravity to the extruders. The extruders melt and pressurize the blend to feed gear type metering pumps. The filament descend vertically through the exhaust chambers and pass over spin finish applicators

that apply liquid finish to the filament bundles. The spills of polymer or dry additives on the third floors are vacuumed up by a central vacuum system. Conveying air is separated and vented.

Plant II (Staple II) consists of the following operations:

Flake unloading, additives blending (no color) spinning and staple processing. These processes are identical in nature to the processes described for Plant I.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a “major” source under PSD/NSR regulations, but has taken limits to avoid a PSD/NSR review.

FiberVisions has an existing facility-wide VOC emissions limit from the extrusion and finishing processes of 99 tons per year to avoid applicability of VOC RACT established by Georgia Rule 391-3-1-.02(2)(tt).

FiberVisions has an existing fuel sulfur content limit of 0.5 percent sulfur by weight to avoid applicability of NO_x RACT established by Georgia Rule 391-3-1-.02(2)(yy).

FiberVisions has an existing particulate matter (PM₁₀) emissions limit from the BICO extrusion lines, processing lines, and finishing of 14 tons per year to avoid PSD/NSR review.

FiberVisions has an existing particulate matter (PM_{2.5}) emissions limit from the BICO extrusion lines, processing lines, and finishing of 9 tons per year to avoid PSD/NSR review

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes	✓		
PM ₁₀	Yes	✓		
PM _{2.5}	Yes	✓		
SO ₂	Yes	✓		
VOC	Yes			✓
NO _x	Yes			✓
CO	Yes			✓
TRS	No			

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
H ₂ S	No			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

Boilers B001, B002, B003, and B005 at the Covington plant classified as "liquid fired" boilers that meet the definition as described in 40 CFR 63 Subpart JJJJJ. As such, they are subject to the rule.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

There is a 99 tpy VOC emissions cap for facility wide extrusion and finishing processes.

B. Applicable Rules and Regulations

The specific MACT JJJJJ rules for Boilers B001, B002, B003, and B005 have been added to this renewal.

C. Compliance Status

The facility is in compliance with all applicable Federal and State air regulations and permit conditions.

D. Permit Conditions

Condition 2.3.1 limits facility wide extrusion and finishing processes VOC emissions to 99 tpy.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Boiler B004 has been removed from the facility.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
B001	Boiler#1, 18MMBtu/hr Burn natural gas and No. 2 fuel oil Installed in 1967	391-3-1-.02(2)(b)1 391-3-1-.02(2)(d)1(ii) 391-3-1-.02(2)(g)2 40 CFR 63 Subpart JJJJJ	3.2.1, 3.3.4, 3.3.5, 3.4.1, 3.4.2, 3.4.3, 5.2.1, 5.2.8, 6.2.1, 6.2.25 through 6.2.33	None	None
B002	Boiler#2, 18MMBtu/hr Burn natural gas and No. 2 fuel oil Installed in 1967	391-3-1-.02(2)(b)1 391-3-1-.02(2)(d)1(ii) 391-3-1-.02(2)(g)2 40 CFR 63 Subpart JJJJJ	3.2.2, 3.3.4, 3.3.5, 3.4.1, 3.4.2, 3.4.3, 5.2.1, 5.2.8, 6.2.1, 6.2.31 through 6.2.33	None	None
B003	Boiler#3, 36MMBtu/hr Burn natural gas and No. 2 fuel oil Installed in 1968	391-3-1-.02(2)(b)1 391-3-1-.02(2)(d)1(ii) 391-3-1-.02(2)(g)2 40 CFR 63 Subpart JJJJJ	3.2.3, 3.3.4, 3.3.5, 3.4.1, 3.4.2, 3.4.3, 5.2.1, 5.2.8, 6.2.1, 6.2.31 through 6.2.33	None	None
B005	Boiler#5, 41.8MMBtu/hr Burn natural gas and No. 2 fuel oil Installed in 2015	391-3-1-.02(2)(b)1 391-3-1-.02(2)(d)1(ii) 391-3-1-.02(2)(g)2 391-3-1-.02(2)(lll) 40 CFR 60 Subpart Dc 40 CFR 63 Subpart JJJJJ	3.3.1 through 3.3.4, 3.3.6 through 3.3.8, 3.4.4, 3.4.5, 4.2.1, 4.2.2, 5.2.2 through 5.2.7, 6.2.1, 6.2.31 through 6.2.33	None	None
SL01	Spin Line 1	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
SL02	Spin Line 2	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
SL03	Spin Line 3	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
SL04	Spin Line 4	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
SL05	Spin Line 5	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
SS05	Short Cut Spin Line A & B	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
ST01	Staple II Extruder 1	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
ST02	Staple II Extruder 2	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.6, 3.4.8, 6.2.2 through 6.2.7	None	None
ST03	Staple II Finishing Line	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.4.7, 3.4.8, 6.2.2 through 6.2.7	None	None
BICO Extrusion Line #1					
A1	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
B1	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
BICO Extrusion Line #2					
A2	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
B2	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
BICO Extrusion Line #3					

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
A3	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
B3	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
BICO Extrusion Line #4					
A4	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
B4	BICO Extruder	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 6.2.6 through 6.2.11, 6.2.15, 6.2.17 through 6.2.24	None	None
BICO Process Lines					
PL1	BICO Process Line 1	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 3.5.1, 6.2.6 through 6.2.9, 6.2.12, 6.2.16 through 6.2.24	None	None
PL2	BICO Process Line 2	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 3.5.1, 6.2.6 through 6.2.9, 6.2.12, 6.2.16 through 6.2.24	None	None
BICO Finish					
BF	BICO Finish	391.3-1-.02(2)(b)1 391-3-1-.02(2)(e)	3.2.4, 3.2.5, 3.4.7, 3.4.8, 3.5.1, 6.2.6 through 6.2.9, 6.2.13, 6.2.14, 6.2.18 through 6.2.20, 6.2.22, 6.2.24	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

FiberVisions has four bicomponent (BICO) lines which includes eight extruders (Source ID Nos. A1, B1, A2, B2, A3, B3, A4, and B4)) and two process lines (Source ID Nos. PL1 and PL2) at Plant I. To avoid applicability of PSD/NSR, the Division has limited PM₁₀ emissions and PM_{2.5} emissions every twelve consecutive months for the four bicomponent (BICO) lines and two process lines.

Rules and Regulations Assessment:

40 CFR 63 Subpart JJJJJ applies to boilers B001, B002, B003, and B005 since the facility is an area source for HAPs.

40 CFR 60 Subpart Dc applies to the boiler B005 since the boiler B005 has a heat input capacity greater than 10 MMBtu/hr and constructed after June 9, 1989. Subpart Dc does not apply to Boilers B001, B002, and B003 because those boilers were constructed before June 9, 1989.

Georgia Air Quality Rule 391-3-1-.02(2)(b), *Visible Emissions*, applies to any visible emissions emitted from the facility.

Georgia Air Quality Rule 391-3-1-.02(2)(d), *Fuel-burning Equipment*, applies to any fuel burning equipment at a facility.

Georgia Air Quality Rule 391-3-1-.02(2)(e), *Particulate Emission from Manufacturing Processes*, applies to BICO process lines.

Georgia Air Quality Rule 391-3-1-.02(2)(g), *Sulfur Dioxide*, applies to any fuel-burning sources located at a facility.

Georgia Rules 391-3-1-.02(2)(III) – NO_x Emissions for boiler B005.

C. Permit Conditions

The renewal Permit combines the Conditions in Permit Nos. 2824-217-0020-V-03-0 and 2824-217-0020-V-03-1.

Condition 3.2.1 limits the steam of Boiler No. 1 to 10,400 lbs/hr.

Condition 3.2.2 limits the steam of Boiler No. 2 to 10,400 lbs/hr.

Condition 3.2.3 limits the steam of Boiler No. 3 to 34,900 lbs/hr.

Condition 3.2.4 is the PM₁₀ limit for Process Equipment Groups BICO Extrusion Lines 1, 2, 3, and 4 and BICO Process Lines 1 and 2.

Condition 3.2.5 is the PM_{2.5} limit for Process Equipment Groups BICO Extrusion Lines 1, 2, 3, and 4 and BICO Process Lines 1 and 2.

Conditions 3.3.1 through 3.3.3 are the NSPS Subpart Dc requirements for Boiler B005.

Condition 3.3.4 is the general MACT Subpart JJJJJ requirement for Boilers B001, B002, B003, and B005.

Condition 3.3.5 is MACT Subpart JJJJJ biennial performance tune-ups requirements for Boilers B001, B002, and B003.

Conditions 3.3.6 through 3.3.8 are MACT Subpart JJJJJ conditions for Boiler B005, which include 5- years performance tune-ups.

Condition 3.4.1 is the Georgia Rules 391-3-1-.02(2)(b) opacity requirement for Boilers B001, B002, and B003.

Condition 3.4.2 is the Georgia Rules 391-3-1-.02(2)(d) requirement for Boilers B001, B002, and B003.

Condition 3.4.3 is the Georgia Rules 391-3-1-.02(2)(g) fuel requirement for Boilers B001, B002, B003, and B005. The boilers shall burn natural gas or #2 fuel oil only.

Condition 3.4.4 is the Georgia Rules 391-3-1-.02(2)(d) requirement for Boiler B005.

Condition 3.4.5 is the Georgia Rules 391-3-1-.02(2)(III) NOx requirement for Boiler B005.

Condition 3.4.6 is the Georgia Rules 391-3-1-.02(2)(e) requirement for Process Equipment Group I.

Condition 3.4.7 is the Georgia Rules 391-3-1-.02(2)(e) requirement for Process Equipment Group II.

Condition 3.4.8 is the Georgia Rules 391-3-1-.02(2)(b) opacity requirement for Synthetic Fiber Extrusion Lines SL01 and Process Equipment Group BICO.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

The renewal Permit combines the Conditions in Permit Nos. 2824-217-0020-V-03-0 and 2824-217-0020-V-03-1.

Permit Conditions 4.2.1 is NSPS Subpart Dc testing requirements for Boiler B005.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

The renewal Permit combines the Conditions in Permit Nos. 2824-217-0020-V-03-0 and 2824-217-0020-V-03-1.

Condition 5.2.1 is the monitoring requirement for Boilers B001, B002, and B003.

Conditions 5.2.2 through 5.2.5 are the NSPS Subpart Dc monitoring requirements for Boiler B005.

Condition 5.2.6 is the GA rule (III) NO_x monitoring requirement for Boiler B005.

Condition 5.2.7 is the MACT JJJJJ tune-ups monitoring requirements for Boiler B005.

Condition 5.2.8 is the MACT JJJJJ tune-ups monitoring requirements for Boilers B001, B002, and B003.

C. Compliance Assurance Monitoring (CAM)

This facility does not have control equipment for any pollutant, therefore CAM is not applicable.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a [quarterly or semiannual] basis.

The renewal Permit combines the Conditions in Permit Nos. 2824-217-0020-V-03-0 and 2824-217-0020-V-03-1 in Condition 6.1.7.

B. Specific Record Keeping and Reporting Requirements

The renewal Permit combines the Conditions in Permit Nos. 2824-217-0020-V-03-0 and 2824-217-0020-V-03-1.

Condition 6.2.1 is the No 2 fuel oil recordkeeping requirement for boilers.

Conditions 6.2.2 through 6.2.24 are reporting and recordkeeping requirements for various VOC emissions from facility wide BICO extrusions, process lines and finish lines.

Conditions 6.2.25 through 6.2.30 are NSPS Subpart Dc reporting and recordkeeping requirements for boiler B005.

Conditions 6.2.31 through 6.2.33 are the MACT Subpart JJJJJ reporting and recordkeeping requirements for boilers.

VII. Specific Requirements**A. Operational Flexibility**

Not Applicable. No requests for operational flexibility for any equipment are associated with this renewal.

B. Alternative Requirements

Not Applicable. No alternative requirements are added as part of this renewal.

C. Insignificant Activities

Refer to <http://gatv.georgiaair.org/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Not Applicable. No temporary sources are added as part of this renewal.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

Not Applicable. No compliance schedule/progress reports are added as part of this renewal.

G. Emissions Trading

Not Applicable. No emissions trading associated with this renewal.

H. Acid Rain Requirements

The facility is not subject to acid rain requirements.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F is included in the permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. The facility does have air conditioners or refrigeration equipment that contain such substances. The facility does not maintain service, repair, or disposes of any motor vehicle air conditioners or appliances and therefore not subject to 40 CFR Part 82, Subpart B.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable. No specific conditions included in the renewal.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative