

Facility Name: **Milliken & Company – Live Oak/Milstar Complex**

City: LaGrange

County: Troup

AIRS #: 04-13-285-00032

Application #: TV-329876

Date SIP Application Received: June 7, 2019

Date Title V Application Received: June 7, 2019

Permit No: 2273-285-0032-V-04-1

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2273-285-0032-V-04-0	3/26/2018	Title V Permit renewal

B. Regulatory Status**1. PSD/NSR/RACT**

The proposed changes will result in facility's potential to emit for VOC to exceed 250 tons per year. To avoid a PSD/NSR review and remain as a "minor" source, the facility requests a facility wide PSD minor limit of 249 tons per year on VOC emissions.

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	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓	✓		
VOC	✓	✓		
NO _x	✓	✓		
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

Milliken proposes to modify the existing line (Generic Emission Group AK01) for printing and finishing by adding a printing operation and finishing equipment. The proposed changes will result in the facility's potential to emit for VOC to exceed 250 tons per year. To avoid PSD major source status, the facility requests a facility wide PSD minor limit of 249 tpy on VOC emissions. The facility also requests a facility wide single HAP and combined HAPs 10/25 tpy limits in this Permit Amendment.

B. Emissions Change

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	<1	<1
PM ₁₀	✓	<1	<1
PM _{2.5}	✓	<1	<1
SO ₂	✓	<1	<1
VOC*	✓	27	<22
NO _x	✓	5.7	11.3
CO	✓	3.3	6.5
TRS	✓	--	--
H ₂ S	✓	--	--
Individual HAP	✓	<0.1	<0.1
Total HAPs	✓	0.1	0.1

C. PSD/NSR Applicability

PSD/NSR Applicability

The modification is not subject to PSD review since the facility requests a facility wide VOC limit of 249 tpy.

NSPS Modification

The modification is not subject to NSPS modification since the proposed Excalibur process does not have any equipment that meets the source-type applicability criteria of 40 CFR Part 60 Subpart VVV.

NESHAP Modification

The modification is not subject to NESHAP modification since the facility requests a facility wide single HAP and combined HAPs 10/25 tpy limits and the Excalibur process is not the categories regulated by the area source standards.

III. Facility Wide Requirements

A. Emission and Operating Caps:

Facility wide 249 tpy VOC limit has been added.

Facility wide 10/25 tpy single HAP/combined HAPs limits have been added.

B. Applicable Rules and Regulations

Unchanged.

C. Compliance Status

None applicable.

D. Permit Conditions

Permit Condition 2.1.1 has been added to reflect the facility wide VOC limit.

Permit Condition 2.1.2 has been added to reflect the facility wide single HAP and combined HAPs limits.

IV. Regulated Equipment Requirements

A. Brief Process Description

The Live Oak/Milstar Complex consists of preparation, dyeing, coating and finishing operations that produce broadloom carpet, rugs, and modular carpet tile products.

Broadloom carpet and rugs are prepared, dyed, washed and dried on a Broadloom Dye Range (AI01). Broadloom carpet and rugs may then be coated and finished on Broadloom Finishing Range (EAA). Range LAA consists of backcoaters and direct fired drying ovens which apply and cure an adhesive (such as latex) to the broadloom carpet. This material is then batched or cut into customer sized units.

Tile products are coated, backed, and cut to size on the Carpet Tile Formation Range (LAA and MAA). Tile may then be dyed, washed, dried, and finished on one of the three Tile Pattern Ranges (AK01).

Mixing and compounding for the Broadloom, rug and tile coating process is done with Coating Mix Preparation Equipment (RAA).

Steam for the facility is produced by four boilers (VAA, VBA, VCA, and VDA).

Other operations not specifically listed above but included as Insignificant Activities, Generic Emissions Grouping or Short Term activities that either support one or more of the above processes or are minor carpet finishing processes.

This modification will modify the existing line (Generic Emission Group AK01) for printing and finishing by adding a printing operation and finishing equipment.

B. Equipment List for the Process

Unchanged.

C. Equipment & Rule Applicability

Emission and Operating Caps –

Unchanged.

Applicable Rules and Regulations -

Unchanged.

The new printing operation and finishing equipment are not subject to Georgia Rule 391-3-1-.02(2)(x) since the Excalibur process unit prints designs on carpet and does not meet the criteria for the types of coating operations defined in this rule.

Operation of the tile printing process emits polypropylene glycol, which is not a Toxic Air Pollutant. Division maintains a guidance defining which compounds must be evaluated as air toxics as well as the procedures for the evaluation (Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions, May 2017). The compounds in Appendix A must be evaluated. The Safety Data Sheets (SDSs) for process chemicals used in this process were reviewed by the facility. No compounds listed in Appendix A to the Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions are present in any of the process chemicals at levels above 0.1% for carcinogens or 1% for non-carcinogens.

D. Permit Conditions

Unchanged.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Unchanged.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Unchanged.

VII. Other Record Keeping and Reporting Requirements

Conditions 6.1.7b.v., 6.1.7b.vi., 6.2.13 through 6.2.18 have been added to reflect the addition of Conditions 2.1.1 and 2.1.2.

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

Not applicable

B. Alternative Requirements

None applicable.

C. Insignificant Activities

None applicable.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements/CAIR/CSPAR

Not applicable

I. Prevention of Accidental Releases

Not applicable

J. Stratospheric Ozone Protection Requirements

Not applicable

K. Pollution Prevention

Not applicable

L. Specific Conditions

None applicable.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//