Facility Name: **Milliken & Company – Valway Plant**
City: LaGrange
County: Troup
AIRS #: 04-13-285-00045

Application #: TV-56713
Date Application Received: November 1, 2017
Permit No: 2262-285-0045-V-04-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Manny Patel
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Permitting Program Manager		Eric Cornwell

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: Milliken & Company – Valway Plant

2. Parent/Holding Company Name

Milliken & Company

3. Previous and/or Other Name(s)

None.

4. Facility Location

1300 Fourth Avenue
LaGrange, GA 30240
Troup County

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

The facility is located in an attainment area (Troup County).

B. Site Determination

Milliken & Company - Hillside Coating Plant (AIRS No. 285-00082) and Milliken & Company - Valway Plant (AIRS No. 285-00045) comprise the same Title V site because the plants are located on contiguous property, operate under common control, and are a major source of HAP. Previously the Title V site also included Milliken & Company - Hillside Plant (AIRS No. 285-00040), but this facility ceased operations on Dec. 11, 2009, and the permit was revoked on Dec. 18, 2009. This Title V Permit will cover only the Milliken & Company - Valway Plant (AIRS/AFS No. 285-00045). The remaining portion of this site is covered under the following Title V permit application:

Plant	Permit No.	Primary SIC Code
Milliken & Company - Hillside Coating Plant	3069-285-0082-V-03-0	3069

Previously, the Milliken & Company - Hillside Plant (AIRS/AFS No. 285-00040) and the Milliken & Company - Valway Plant were considered to comprise the same Title I site. Due to the closure of the Milliken & Company - Hillside Plant, the Milliken & Company - Valway Plant is now considered a single and separate Title I site. The Milliken & Company - Hillside Coating Plant is not included in the Milliken & Company - Valway Plant Title I site because the Milliken & Company - Hillside Coating Plant does not have the same two-digit SIC major group code (Major Group 30: Rubber And Miscellaneous Plastics Products vs. Major Group 22: Textile Mill Products) and it is not classified as a support facility.

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
2262-285-0045-V-03-0	August 28, 2013	Title V Renewal
2262-285-0045-V-03-1	March 12, 2014	Removal of the Range 4 (R004) coater
Off Permit Change (App No. 22271)	January 6, 2014	Addition of a propane heat gun rated at 172,500 Btu/hr to the concrete cloth line (CC01)
Off Permit Change (App No. 22283)	January 6, 2014	Addition of 3 printing systems with 4 print heads each, with 2 print systems located in airbag debatching (DPR6, DPR7) and 1 print system located on Range 6 (R006).
Off Permit Change (App No. 22565)	June 3, 2014	Installation of a flange to isolate the boiler from the thermal oxidizer.
Off Permit Change (App No. 22728)	July 24, 2014	Chemistry change will result in increase in potential toluene emissions below the cumulative modification permitting threshold.
Off Permit Change (App No. 23490)	September 17, 2015	Installation of a SIP exempted Printing System
Off Permit Change (App No. 23496)	September 17, 2015	Change in product formulation.
Off Permit Change (App No. 23702)	March 8, 2016	Product Reformulating
2262-285-0045-V-03-2	January 5, 2017	Change in product formulation
Off Permit Change (App No. 26073)	June 19, 2017	Change in formulation
Off Permit Change (App No. 26251)	November 1, 2017	Installation of printing system
Off Permit Change (App No. 26270)	November 13, 2017	Chemical change on Finishing Ranges 3, 4 and 5
Off Permit Change (App No. 26278)	November 13, 2017	Installation of IR ink system on Range 6
Off Permit Change (App No. 26305)	November 30, 2017	Addition of a slitter and heat seal machine.

D. Process Description

1. SIC Codes(s)

2262 - Finishers of Broadwoven Fabrics of Manmade Fiber and Silk
2295 - Coated Fabrics, Not Rubberized
3069 - Fabricated Rubber Products, Not Elsewhere Classified

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)

Milliken & Company - Valway Plant is a broadwoven fabric finisher and coater, producing broadwoven fabrics, coated fabrics, and rubber-coated fabrics.

3. Overall Facility Process Description

Textile Finishing Ranges:

The five textile finishing ranges (R001, R003, R004, R005, and R006) dye and finish broadwoven fabrics and may include one or more chemical application pads, scouring boxes, and ovens in addition to the textile handling and auxiliary equipment (all ranges do not have all components). Finishing Range R005 performs some scouring in addition to dyeing and finishing. Finishing Range R006 does not perform dyeing but scours as a finishing process. Scouring boxes consist of equipment designed to clean or scour textiles with water or an aqueous based solution. Ovens are used to dry, heatset, or both.

Textile Coating Ranges:

Coaters are installed on Finishing Ranges R003 (knife coater) and R006 (knife and rotogravure coater) and apply polymeric coatings. Tenter frames are used to heatset the coatings. The coater for Range 004 was removed in March 2014.

Boiler:

The 70 MMBtu/hr boiler (HB01) is fueled primarily by natural gas, propane, and residual fuel oil, and generates any steam required. The facility uses natural gas as the primary fuel in order to avoid the more stringent requirements of the Boiler MACT. Residual oil will only be used during periods of gas curtailment, gas supply emergencies, or periods of testing on fuel oil.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Milliken & Company - Valway Plant is potentially a major source under PSD, but had taken limits to remain a minor source and avoid PSD review. The facility operates under a 249 tpy VOC emission limit for the textile finishing and coating ranges R001 through R006

Previously, Milliken & Company - Hillside Plant and Milliken & Company - Valway Plant were considered one Title I site. Due to the closure of the Hillside Plant, the Valway Plant is considered a single and separate Title I site, and the Hillside Plant's PSD avoidance limits of 249 tpy SO_2 and 49 tpy VOC were transferred to the Valway Plant, which already had a PSD

avoidance limit of 200 tpy VOC. As a result, Permit No. 2262-285-0045-V-02-1 contained a 249 tpy VOC emission limit and a 249 tpy SO_2 emission limit which pertained to Boiler HB01.

Permit No. 2262-285-0045-V-03-0 modified the fuel usage in Boiler HB01 to firing only natural gas, propane, or residual oil in order for the boiler to be classified as a *Unit designed to burn gas 1* as defined by 40 CFR 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. This allows the boiler to avoid the more stringent requirements of the Boiler MACT including the emissions limits for the rule. As a requirement for this classification, residual oil will only be used during periods of gas curtailment, gas supply emergencies, or periods of testing on fuel oil, where testing on fuel oil shall not exceed 48 hours per calendar year. Because fuel oil can only be fired for 48 hours, this inherently limits the SO_2 emissions from the boiler. Therefore, the previous PSD avoidance limit of 249 tpy SO_2 emission limit is no longer necessary and was removed from this renewed permit.

This Title I site does not have the potential to emit PM, PM_{10}, CO, or NO_x in amounts equal to or greater than 250 TPY and is not one of the 28 named source categories subject to the 100 TPY applicability threshold.

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			
H_2S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The facility is subject to all applicable provisions of 40 CFR Part 63 Subpart OOOO - *National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles*. The facility qualifies as an existing source in regard to Subpart OOOO, and the compliance date was May 29, 2006.

Boiler HB01 is subject to 40 CFR 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*. The facility qualifies as an existing source in regard to Subpart DDDDD.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted with this application.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Application No. 556713 requested to remove Textile Finishing Range 2 (R002). As a result, this range has been removed from the following table in addition to corresponding conditions.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
R001	Textile Finishing Range 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	3.2.1, 3.3.4, 3.3.6 through 3.3.7, 3.4.1 through 3.4.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.4, 6.2.9 through 6.2.14	WEP1	Wet Electrostatic Precipitator
R003	Textile Finishing/Coating Range 3 (polymeric coating)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(x) NSPS Subpart A NSPS Subpart VVV 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	3.2.1, 3.3.1 through 3.3.7, 3.4.1 through 3.4.3, 3.4.5, 3.4.6, 5.2.1, 6.1.7, 6.2.1 through 6.2.4, 6.2.5 through 6.2.14	WEP1	Wet Electrostatic Precipitator
R004	Textile Finishing Range 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	3.2.1, 3.3.4, 3.3.6 through 3.3.7, 3.4.1 through 3.4.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.4, 6.2.9 through 6.2.14	WEP1	Wet Electrostatic Precipitator
R005	Textile Finishing Range 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	3.2.1, 3.3.4, 3.3.6 through 3.3.7, 3.4.1 through 3.4.3, 5.2.1, 6.1.7, 6.2.1 through 6.2.4, 6.2.9 through 6.2.14	WEP1	Wet Electrostatic Precipitator
R006	Textile Finishing/Coating Range 6 (polymeric coating)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(x) NSPS Subpart A NSPS Subpart VVV 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	3.2.1, 3.3.1 through 3.3.7, 3.4.1 through 3.4.3, 3.4.5, 3.4.6, 6.1.7, 6.2.1 through 6.2.4, 6.2.5 through 6.2.14	None	None
HB01	Cleaver Brooks Boiler (70 MMBtu/hr)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	3.2.2, 3.3.8 through 3.3.11, 3.4.3, 3.4.4, 5.2.2, 5.2.3, 6.1.7, 6.2.15 through 6.2.27	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:

The Textile Finishing and Coating Ranges (R001 – R006) are limited to 249 tons of VOC emissions during any 13 consecutive periods, where one period is 4 calendar weeks. The purpose of this cap is to avoid being subject to PSD. Previously, Milliken & Company - Hillside Plant and Milliken & Company - Valway Plant were considered to comprise the same Title I site and operated under one combined PSD avoidance limit of 249 tons VOC per 13 consecutive

periods, with VOC emissions from the Hillside Plant limited to 49 tons per 13 consecutive periods, and Valway Plant limited to 200 tons per 13 consecutive periods. Due to the closure of the Hillside Plant, the Valway Plant is considered a single and separate Title I site, and the Hillside Plant's PSD avoidance limit of 49 tons VOC per 13 consecutive periods was transferred to the Valway Plant.

Boiler HB01 is limited to firing only natural gas, propane, or residual oil in order to be classified as a *Unit designed to burn gas 1* as defined by 40 CFR 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. This allows the boiler to avoid the more stringent requirements of the Boiler MACT including the emissions limits for the rule. As a requirement for this classification, residual oil will only be used during periods of gas curtailment, gas supply emergencies, or periods of testing on fuel oil, where testing on fuel oil shall not exceed 48 hours per calendar year. A notification is required if the facility changes fuel usage which results in a change in boiler classification. The previous PSD avoidance limit of 249 tpy for SO_2 emissions is no longer necessary.

VOC usage in Textile Finishing/Coating Ranges R003 and R006 is limited to less than 95 mega-grams (Mg), each, during any 13 consecutive 4-week periods to avoid being subject to the VOC emission standard of 40 CFR 60 Subpart VVV, *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities*. The VOC emission standard would require either a 90% reduction in VOC emissions, or the use of a control device to reduce VOC emissions by 95%. With the 95 Mg VOC usage limit in place, only the record-keeping and reporting requirements of Subpart VVV apply.

Rules and Regulations Assessment:

Georgia Rule (b) - *Visible Emissions* applies to any visible emissions emitted from Textile Finishing and Coating Ranges R001 through R006. Boiler HB01 is not subject to Rule (b) because it is subject to the more restrictive opacity limit in Georgia Rule 391-3-1-.02(2)(d)3.

Georgia Rule (e) - *Particulate Emission from Manufacturing Processes* applies to the Textile Finishing and Coating Ranges R001 through R006. Textile Finishing Range R001 was installed in 1956, so is considered existing equipment subject to 391-3-1-.02(2)(e)(ii). Textile Finishing and Coating Ranges R003 through R006 were installed after July 2, 1968, so are considered new equipment subject to 391-3-1-.02(2)(e)(i). Boiler HB01 is not subject to Rule (e) because, as fuel burning equipment, it is instead subject to the particulate matter limitation in Georgia Rule 391-3-1-.02(2)(d)2(ii).

Georgia Rule (g) – *Sulfur Dioxide* limits the sulfur content of the fuels burned in Boiler HB01 and the range dryers in Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006 to 2.5 weight percent. The range dryers are fired with either natural gas or propane, so the ranges will inherently comply with the rule. The boiler is fired with natural gas, propane or residual oil, so the facility will have to ensure that any residual oil used complies with Georgia Rule (g).

Georgia Rule (x) - *VOC Emissions from Fabric and Vinyl Coating* applies to Textile Finishing/Coating Ranges R003, R004, and R006 because potential VOC emissions from the facility from all Georgia Rule (x) activities combined exceeds 100 tpy and because the facility applies coating to fabric in these ranges using knife coating and rotogravure coating methods, as defined in the rule. This rule limits VOC emissions from a fabric coating line to 2.9 lbs/gal of coating, excluding water, delivered to the coating applicator. If a coating contains more than 2.9 lbs VOC/gal of coating then the solids equivalent limit is 4.79 lbs VOC/gal of coating solids delivered to the coating applicator.

40 CFR 60 Subpart VVV - *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities* applies to Textile Finishing/Coating Ranges R003 and R006 because they are coating operations used for the polymeric coating of supporting substrates and each of these coating operations were constructed after Subpart VVV's effective date of April 30, 1987. Textile Finishing/Coating Range R004 had previously been subject to NSPS VVV; however, the coater was removed in March 2014 and does not perform any coating.

40 CFR 63 Subpart OOOO - *National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles* applies to Textile Finishing and Coating Ranges R001 through R006, and the facility is considered an existing source, with a compliance date of May 29, 2006. Applicability for this standard is triggered when a facility performs printing, coating, slashing, dyeing or finishing of fabric and other textiles and the facility is a major source for the emission of HAP, as defined in 40 CFR 63.2. 40 CFR 63 Subpart OOOO limits the organic HAP emissions from the existing web coating and printing operations to no more than 0.12 kg of organic HAP per kg of solids applied. There are alternate limits to choose from if control devices are used, but Milliken's Valway Plant does not currently use any control devices to reduce HAP emissions. Organic HAP emissions from existing dyeing and finishing operations are limited to no more than 0.016 kg of organic HAP per kg of dyeing and finishing materials applied. Subpart OOOO also has operating limits and work practice standards when add-on control devices are used to comply with the HAP emission limits, but the Valway Plant does not currently use any control devices to reduce HAP emissions. The facility currently uses the averaging compliance option for the coating operations, which would be the *Emission Rate Without Add-On Controls Option*. Previously, the facility had requested that all compliance options be included in the permit; however, they have now requested to only include applicable conditions and remove references to control device options.

Boiler HB01 was manufactured before the June 8, 1989 applicability date for 40 CFR 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, and the boiler was not modified or reconstructed when the responsibility for operating the boiler was transferred from the Hillside Plant to the Valway Plant, so Subpart Dc is not applicable.

Boiler HB01 is subject to Georgia (d) – *Fuel Burning Equipment* which limits the particulate matter from fuel-burning equipment. Because the boiler was constructed after January 1, 1972, and has a heat input equal to or greater than 10 MMBtu/hr and less than or equal to 250 MMBtu/hr, the allowable PM emission rate is $P = 0.5(10/R)^{0.5}$. This rule also limits the visible emissions (opacity) from the boiler.

Boiler HB01 is subject to 40 CFR 63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*. Boiler HB01 uses natural gas as the primary fuel in order to avoid the more stringent requirements of the Boiler MACT. Residual oil will only be used during periods of gas curtailment, gas supply emergencies, or periods of testing on fuel oil, where testing on fuel oil shall not exceed 48 hours per calendar year. This change in fuel usage will place Boiler HB01 in the subcategory of units designed to burn gas 1 fuels in Subpart DDDDD, and this subcategory of boilers is not subject to the emission limits in Tables 1 and 2 or 11 through 13 to Subpart DDDDD, or the operating limits in Table 4 to Subpart DDDDD (40 CFR 63.7500(e)).

C. Permit Conditions

The previous Condition 3.2.2 concerning the 249 tpy SO_2 emission limit for PSD avoidance was removed and subsequent conditions were renumbered.

- Condition 3.2.1 limits the VOC emissions from Finishing and Coating Ranges 1 – 6 (Emission Unit ID Nos. R001, R003, R004, R005, and R006) to 249 tpy VOC. Previously, the Hillside Plant and the Valway Plant were considered to comprise the same Title I site, and that Title I site was a synthetic minor source under PSD because the site operated under a shared 249 tpy VOC emission limit that was split between the two facilities, with the Hillside Plant having a 49 tpy VOC emission limit, and the Valway Plant having a 200 tpy VOC emission limit. Now that the Hillside Plant is closed, the Valway Plant is a single and separate Title I site that no longer must share a PSD avoidance limit for VOC, so it operates with a 249 tpy VOC emission limit.
- Condition 3.2.2 limits which fuels can be fired in Boiler HB01 to that the facility can be classified as a *Unit designed to burn gas 1* which allows the boiler to avoid the emission limits of the Boiler MACT.

40 CFR 60 Subpart VVV

- Condition 3.3.1 subjects Textile Finishing/Coating Ranges R003 and R006 to the applicable requirements of the New Source Performance Standards (NSPS) in 40 CFR 60 Subpart VVV, *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities*, and 40 CFR 60 Subpart A, *General Provisions*.
- Condition 3.3.2 limits VOC usage for coating operations in the Textile Finishing/Coating Ranges R003 or R006 to less than 95 Mega-grams (Mg) (104.7 tons) of VOC, each, during any 13 consecutive 4-week periods. This emission limit prevents these coating operations from being subject to the VOC emission standard of 40 CFR 60 Subpart VVV, which would require extreme emission reductions. Because of the usage limit, only the record-keeping and reporting requirements of Subpart VVV apply.
- Condition 3.3.3 defines "VOC used" according to NSPS VVV.

40 CFR 63 Subpart OOOO

At the request of the facility, all references to *Add-On Controls Options* were omitted from this Title V renewal permit.

- Condition 3.3.4 subjects Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006 to 40 CFR 63 Subpart OOOO, *National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles*.
- Condition 3.3.5 requires HAP emissions from web coating and printing operations (Textile Finishing/Coating Ranges R003 and R006) to be limited to the applicable emission limits by using *Emission Rate Without Add-On Controls Option or Compliant Material Option* in Table 3.3.5-1 by applying one of the 40 CFR 63 Subpart OOOO web coating and printing compliance options listed. Milliken's Valway Plant is an existing source in regard to Subpart OOOO, as defined in 40 CFR 63.4282(e). The facility currently uses the *Emission Rate Without Add-On Controls Option.*
- Condition 3.3.6 requires HAP emissions from dyeing and finishing operations to be limited to the applicable emission limit in Table 3.3.6-1 by applying one of the 40 CFR 63 Subpart OOOO dyeing and finishing compliance options listed. This condition applies to the dyeing and finishing operations on Textile Finishing Ranges R001, R003, R004, R005, and R006. The facility stated that it currently uses the averaging compliance option for the dyeing and finishing operations, which would be the *Emission Rate Without Add-On Controls Option*.
- Condition 3.3.7 requires that the *Equivalent Emission Rate Compliance Option* for dyeing and finishing operations not be used at the same time as any other dyeing and finishing compliance option, as required by 40 CFR 63.4291(c).
- Previous Conditions 3.3.8, 3.3.9 and 3.3.10 concerned compliance using add-on controls, work practice standards and a written startup, shutdown, and malfunction plan. However, these conditions were not included in the permit since the facility does not currently use any control devices and subsequent conditions were renumbered.
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40 CFR 63 Subpart DDDDD

- Condition 3.3.8 subject Boiler HB01 to 40 CFR 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.
- Condition 3.3.9 details the work practice standards of the Boiler MACT. This condition was modified to remove the one time energy assessment which has already been completed.
- Previous Condition 3.3.13 was deleted because it concerned the initial tune-up as required by the Boiler MACT for Boiler HB01. This was completed January 11, 2016 (with the burner inspection on November 27, 2015). The following conditions were renumbered as a result.
- Condition 3.3.10 requires an annual tune-up of Boiler HB01 and lists the requirements for performing the annual tune-up.
- Condition 3.3.11 details the requirements for performing the annual tune-up if the boiler is not operating on the date that the tune-up is required.
- Previous Condition 3.3.16 was deleted because it concerned the one-time energy assessment as required by the Boiler MACT for Boiler HB01. This was completed in December 2015.

SIP Rules

- Condition 3.4.1 subjects the Textile Finishing and Coating Ranges to Georgia Rule (e).
- Condition 3.4.2 subjects all process equipment to Georgia Rule (b).
- Condition 3.4.3 subjects the Textile Finishing and Coating Ranges and Boiler HB01 to Georgia Rule (g) and limits the sulfur dioxide of the fuel combusted.
- Condition 3.4.4 subjects Boiler HB01 to Georgia Rule (d).
- Condition 3.4.5 limits the VOC emissions from Textile Finishing/Coating Ranges R003 and R006 in order to comply with Georgia Rule (x). Range R004 was removed from this condition since the coater was removed from this range.
- Condition 3.4.6 details the compliance options for Georgia Rule (x).

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

Not applicable.

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

- Condition 5.2.1 requires monitoring the secondary (DC) voltage on each field in Wet Electrostatic Precipitator (WESP) WEP1 and the temperature of the gas stream at the outlet of the quench chamber of WEP1. The established secondary (DC) voltage value for WEP1 is a minimum of 16.5 kV. The established temperature value for WEP1 is a maximum of 141°F. Permit Amendment No. 2262-285-0045-V-02-2 removed Textile Finishing/Coating Range 6 (R006) from the requirements for the emission unit to vent through the Wet Electrostatic Precipitator when coating. A stack test had been performed for stack R9C2 which is the stack that Range 6 exhausts through. During this test, it was determined that Range 6 does not need a control device to comply with Georgia Rule (b) – Visible Emissions and Georgia Rule (e) – Particulate Emissions from Manufacturing Processes.
- Condition 5.2.2 requires opacity monitoring for Boiler HB01 involving daily visible emission checks when the boiler is burning residual fuel oil.
- Condition 5.2.3 lists the alternative opacity monitoring requirements for Boiler HB01.

C. Compliance Assurance Monitoring (CAM)

CAM is not applicable because potential pre-control PM_{10} emissions do not exceed the major source threshold (100 tpy) for any of the individual textile range.

CAM does not apply for VOC emissions from the textile ranges since there are no control devices for VOC emissions.

Boiler HB01 is not subject to CAM because it does not have an air pollution control device.

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 semiannual basis.

B. Specific Record Keeping and Reporting Requirements

- Condition 6.2.1 requires the maintenance of usage records on a 4-calendar-week-period basis for all VOC-containing materials used in Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006.
- Condition 6.2.2 requires the calculation of the total 4-calendar-week period VOC emissions from Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006, combined, using the records required by Condition 6.2.1.
- Condition 6.2.3 requires the calculation of the 13-consecutive-period total of VOC emissions from Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006, combined, using the records in Condition 6.2.2.
- Condition 6.2.4 requires the 13-consecutive-period total of VOC emissions (in tons) from Textile Finishing and Coating Ranges R001, R003, R004, R005, and R006, combined, calculated according to Condition 6.2.3, to be included in the semiannual report required by Condition 6.1.4.
- Previous Condition 6.2.5 had stated that the Scour Solution Tank T001 is no longer subject to NSPS Kb since it was amended on October 15, 2003 to apply only to storage vessels with capacities greater than or equal to 75 m^3 (19,812.9 gal). Scour Solution Tank T001 has a capacity of 11,500 gallons, so it is too small for NSPS Kb to apply. Because this condition is no longer necessary, it was removed from this permit and the following conditions were renumbered.

<u>NSPS VVV Record Keeping and Reporting Requirements</u>

- Conditions 6.2.5 through 6.2.8 apply to the 95 Mg VOC usage limit in Condition 3.3.3 for NSPS VVV.
- Condition 6.2.5 requires the calculation of the total mass of VOC (in Mg) used during each period in each of the Textile Finishing/Coating Ranges R003 and R006, individually.
- Condition 6.2.6 requires the calculation of the 13-consecutive period total of VOC usage in each of the Textile Finishing/Coating Ranges R003 and R006, individually, from the records required by Condition 6.2.5.
- Condition 6.2.7 requires the maintenance of semiannual records of the projected VOC usage and actual VOC usage for each of the Textile Finishing/Coating Ranges R003 and R006, individually.

- Condition 6.2.8 requires the submission of reports within 30 days when either the projected or actual VOC usage for either of the Textile Finishing/Coating Ranges R003 or R006 exceeds 95 Mg.

Monitoring Record Keeping Requirements

- Condition 6.2.9 requires that records be maintained of all the monitoring data required by Condition 5.2.1.

40 CFR 63 Subpart OOOO Requirements

- Condition 6.2.10 requires the submission of semiannual compliance reports, performance test reports, and startup, shutdown, and malfunction reports required by Subpart OOOO. References to control device options were removed from this condition.
- Condition 6.2.11 details the records and data be kept as required by Subpart OOOO. References to control device options were removed from this condition.
- Condition 6.2.12 requires that records be kept for 5 years and be kept on site for at least the first 2 years.
- Condition 6.2.13 details how to demonstrate continuous compliance with Subpart OOOO when using the *Compliant Material Option*.
- Condition 6.2.14 details how to demonstrate continuous compliance with Subpart OOOO when using the *Emission Rate Without Add-On Controls Option*.
- Previous Conditions 6.2.15 and 6.2.16 concerned Subpart OOOO compliance demonstration with the *Emission Rate With Add-On Controls Option* and the *Organic HAP Overall Control Efficiency Option* or the *Oxidizer Outlet Organic HAP Concentration Option*. However, these conditions were not included in the permit since the facility does not use control devices to comply with the MACT. Subsequent conditions were renumbered.

Fuel Sulfur Content

Previous Conditions 6.2.19 through 6.2.21 which concerned the calculation of SO_2 emissions from Boiler HB01 were not included in this permit due to the removal of the emission limit. Subsequent conditions were renumbered.

- Condition 6.2.15 requires record keeping for residual oil sulfur content certification and the quantity of residual oil delivered for Boiler HB01.

40 CFR 63 Subpart DDDDD Requirements

- Condition 6.2.16 requires various notifications according to 40 CFR Part 63 Subpart A *General Provisions*, regarding 40 CFR 63 Subpart DDDDD.
- Previous Condition 6.2.23 had required an initial notification indicating the facility is subject to the Boiler MACT. Since this requirement has been completed, this condition was deleted and the following conditions were renumbered.
- Condition 6.2.17 requires a notification of compliance status.

- Condition 6.2.18 requires a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption to notify the Division that a fuel other than natural gas will be used in Boiler HB01.
- Condition 6.2.19 requires a notification of a fuel switch or physical changes to Boiler HB01.
- Previous Condition 6.2.27 required a notification of compliance status along with a certification that the one-time energy assessment was performed in order to demonstrate initial compliance with 40 CFR 63 Subpart DDDDD. Since this requirement has been completed, this condition was deleted and the following conditions were renumbered.
- Condition 6.2.20 requires the submission of an annual compliance report.
- Condition 6.2.21 lists when the annual compliance reports need to be submitted.
- Condition 6.2.22 lists the information required in the annual compliance reports.
- Condition 6.2.23 requires submitting the annual compliance reports to the EPA electronically using CEDRI and also submitting the reports to the Division.
- Condition 6.2.24 lists the record keeping requirements for 40 CFR 63 Subpart DDDDD.
- Condition 6.2.25 requires keeping records of the number of hours that alternative fuels are used in Boiler HB01. Alternative fuels for Boiler HB01 include residual oil.
- Condition 6.2.26 requires start up and shutdown records for Boiler HB01.
- Condition 6.2.27 lists the general record keeping requirements for 40 CFR 63 Subpart DDDDD, such as how long the records must be kept.

VII. Specific Requirements

A. Operational Flexibility

Textile Finishing/Coating Range R003 operates as both dyeing/finishing range and sometimes coating range. Textile Finishing/Coating Range R006 operates both as a finishing range (scouring only) and a coating range. Rules and regulations for coating and dyeing/finishing operations are differentiated in the permit. Georgia Rule (x) and NSPS VVV only apply to coating operations, while NESHAP OOOO has varying requirements for both coating operations and dyeing/finishing operations. The facility must keep track of the coating operations in Textile Finishing/Coating Ranges R003 and R006 separately from the dyeing/finishing operations. The facility uses the Emission Unit ID Nos. of R0B3 and R0B6 for the coating operations on Textile Finishing/Coating Ranges R003 and R006, respectively.

B. Alternative Requirements

- None applicable.

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

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they have air conditioners or refrigeration equipment that use CFC's, HFC's, or other stratospheric ozone-depleting substances listed in 40 CFR Part 82, Subpart A, Appendices A and B, so the facility is subject to Title VI and the applicable requirements in 40 CFR 82 Subpart F - Recycling and Emissions Reduction, but the equipment does not contain a refrigerant charge of greater than 50 pounds.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

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