

**TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW**

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Facility Name: **HP Pelzer Thomson Plant**

City: Thomson

County: McDuffie

AIRS #: 04-13-189-00002

Application #: 12701

Date SIP Application Received: December 8, 2000

Date Title V Application Received: September 11, 2003

Permit No: 2399-189-0002-V-01-2

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>TOXICS</b>	n/a	n/a

**Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed 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 proposed 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 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 and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

**Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2399-189-0002-V-01-0	July 13, 1999	X	
2399-189-0002-V-01-1	April 10, 2001	X	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
2399-189-0002-V-01-0	Initial Title V Permit
2399-189-0002-V-01-1	Amendment to add Airlay Line 3

B. Regulatory Status

1. PSD/NSR/RACT

This facility is minor with respect to PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

**Table 3: 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			X
PM <sub>10</sub>	Yes			X
SO <sub>2</sub>	Yes			X
VOC	Yes			X
NO <sub>x</sub>	Yes			X
CO	Yes			X
TRS	No			X
H <sub>2</sub> S	No			X
Individual AP	Yes	X		
Total HAPs	Yes	X		

**II. Proposed Modification**

A. Description of Modification

The facility removed their two Platisol Lines several years ago. They are requesting to remove the associated regulations, monitoring and recordkeeping.

B. PSD/NSR Applicability

This modification does not trigger PSD/NSR.

**III. Facility Wide Requirements**

A. Emission and Operating Caps

None effected by this modification.

B. Applicable Rules and Regulations

None effected by this modification.

C. Compliance Status

The facility indicates that they are currently in compliance.

D. Operational Flexibility

Not applicable.

E. Permit Conditions

None effected by this modification.

**IV. Regulated Equipment Requirements**

**A. Brief Process Description**

The facility manufactures textile based products. The textile based products begin with a prefabricated compressed textile blanket. The blanket is slightly “fluffed” to separate the compressed fiber strands and is then hot molded and/or milled into a final product. Depending on the final product, treatment with semi- or fully cured resins before final configuration may be necessary.

Plastisol Line #1 (Source Code PL1) and Plastisol Line #2 (Source Code PL2) have been shut down and therefore are being removed from the permit.

**B. Equipment List for the Process**

Plastisol Line #1 (Source Code PL1) and Plastisol Line #2 (Source Code PL2) have been removed from the Equipment Table.

Updated Table 3.1 from permit.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
AL1	Textile Airly Oven #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3	RES-1 MAC-1	Therm. Oxidizer Baghouse 1
AL2	Textile Airly Oven #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3	RES-2 MAC-2	Therm. Oxidizer Baghouse 2
AL3	Textile Airly Oven #3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3	RES-2 MAC3	Therm. Oxidizer Baghouse3
<del>PL1</del>	<del>Plastisol Line 1</del>	—	<del>3.5.2, 5.2.1</del>	<del>JT01</del>	<del>Jenson Thermal Oxidizer</del>
<del>PL2</del>	<del>Plastisol Line 2</del>	—	<del>3.5.2, 5.2.1</del>	<del>JT02</del>	<del>Jenson Thermal Oxidizer</del>

**C. Equipment & Rule Applicability**

No changes in applicable requirements occur due to this modification.

**D. Compliance Status**

The application indicates that the facility is operating in compliance.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

Permit condition 3.5.2 was deleted since it is no longer applicable.

- 3.5.2 Unless otherwise approved by the Division, the appropriate thermal afterburner (Source Codes JTO1 and JTO2) shall be operated at all times that material is being processed in the plastisol lines.  
[391-3-1-.02(2)(a)]

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

A. Individual Equipment:

No testing requirements were changed due to this modification.

B. Equipment Groups (all subject to the same test requirements):

No testing requirements were changed due to this modification.

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

A. Individual Equipment:

Condition 5.2.1 was modified to remove the requirements for monitoring for the shut down equipment.

Old condition 5.2.1:

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate continuous monitoring devices for the measurement of chamber temperature in the incinerators (Source Codes RES1, RES2, JTO1, and JTO2).  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

New condition 5.2.1:

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate continuous monitoring devices for the measurement of chamber temperature in the incinerators (Source Codes RES1 and RES2).  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

B. Equipment Groups (all subject to the same monitoring requirements):

No group monitoring requirements were changed due to this modification.

**VI. Other Record Keeping and Reporting Requirements**

No additional changes were made due to this modification.

**VII. Specific Requirements**

A. Operational Flexibility

None effected by this modification.

B. Alternative Requirements

None effected by this modification.

C. Insignificant Activities

No changes to the Insignificant Activities list were made due to this modification.

D. Temporary Sources

None effected by this modification.

E. Short-Term Activities

None effected by this modification.

F. Compliance Schedule/Progress Reports

None.

G. Emissions Trading

None effected by this modification.

H. Acid Rain Requirements

None effected by this modification.

I. Prevention of Accidental Releases

None effected by this modification.

J. Stratospheric Ozone Protection Requirements

None effected by this modification.

K. Pollution Prevention

None effected by this modification.

L. Specific Conditions

None effected by this modification.

**Addendum to Narrative**

The 45-day EPA review started on March 1, 2004 and ended on April 16, 2004. Comments were not received by the Division.