

Facility Name: **King America Finishing, Inc.**
 City: Dover
 County: Screven
 AIRS #: 04-13-251-00008

Application #: TV-Application No. 16554
 Date Application Received: January 06, 2006
 Date Application Deemed
 Administratively Complete:
 Date of Draft Permit:
 Permit No: 2261-251-0008-V-03-0

Program	Review Engineers	Review Managers
SSPP	Ginger Sheppard	Eric Cornwell
ISMP	TBD	Richard Taylor
SSCP	Deirdre Edwards	James Eason
Toxics	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. 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) 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 Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to King America Finishing, Inc. and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This 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: King America Finishing, Inc.
2. Parent/Holding Company Name: Westex Acquisitions, LLC
3. Previous and/or Other Name(s): pka King Finishing Co.
4. Facility Location: Georgia Highway 17, Dover, Georgia 30424
5. Attainment Area Location
6. Class I Area Impacts: This facility is not located within 100 km of a Class I 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 permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
Permit No. 2261-251-0008-V-02-0	March 11, 2002	X	
Amendment No. 2261-251-0008-V-02-1	May 8, 2002	X	
Amendment No. 2261-251-0008-V-02-2	August 28, 2002	X	
Off-Permit Change (Application No. 14075)	December 27, 2002	X	
Off-Permit Change (Application No. 14402)	June 24, 2003	X	
Off-Permit Change (Application No. 15077)	March 1, 2004	X	
Amendment No. 2261-251-0008-V-02-3	December 28, 2005	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
Permit No. 2261-251-0008-V-02-0	This new permit was issued due to an ownership change.
Amendment No. 2261-251-0008-V-02-1	This amendment to the current permit added Condition No. 8.23.1 which detailed the use of credible evidence or information.
Amendment No. 2261-251-0008-V-02-2	This amendment modified condition 5.2.1(b) to clarify the predictive monitoring system on Boiler B002.
Off-Permit Change (Application No. 14075)	This off-permit change allowed the addition of five new dye jigs.
Off-Permit Change (Application No. 14402)	This off-permit change allowed the addition of a new cloth dryer and the removal of three finishing process machinery units.
Off-Permit Change (Application No. 15077)	This off-permit change allowed the installation of a continuous process production range for encapsulation of woven fabric with a liquid silicon rubber by knife over air application.
Amendment No. 2261-251-0008-V-02-3	This amendment to the current permit limited the facility to a synthetic minor source for HAP emissions and allowed for the construction and operation of two flame retardant fabric-finishing lines.

D. Process Description

1. SIC Codes(s): 2261, 2262

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)

This facility produces cotton and other manmade fabric products which have been bleached, dyed, finished and printed.

3. Overall Facility Process Description

This plant is involved in the bleaching, dyeing, finishing and printing of cotton and manmade fabrics. There are four primary areas: preparation, dyeing, finishing, and printing. Based on the specific product required portions of each sub process can/will be used in numerous combinations to meet a customer specification. The purpose of preparation is to increase dimensional stability, to remove chemicals used in the weaving or fiber preparation, to improve dye affinity/uptake, and to improve strength of the fabric. There can be several steps involved including singeing, desizing, heat setting, mercerization, bleaching, and washing. The dyeing department is a continuous process and typically consists of dye application, dye fixation with chemicals or heat, washing, and drying. Finishing refers to any operations (other than preparation and coloring) that

improve the appearance and/or usefulness of fabric after it has been woven or knitted. Finishing encompasses any of several mechanical and chemical processes performed on fiber, yarn, or fabric to improve its appearance, texture, or performance. The fabric then passes through the finish pad where the chemicals are applied, a pre-dryer and then another set of dry cans before entering the tenter house. The tenter house uses tension to stretch the fabric to the desired width. The finish desired and the placement in the overall process is dependant on the conditions given by the customer.

4. Overall Process Flow Diagram (optional)

A Process Flow Diagram is not included.

E. Regulatory Status

1. PSD/NSR

The facility is a major source under PSD/NSR regulations. Because this facility contains fossil fuel-fired boilers with more than 250 MMbtu/hr of heat input, it is one of the 28 listed PSD source categories with 100 tpy major source thresholds. Emissions from SO₂, NO_x, CO, VOC and PM₁₀ have the potential to exceed 100 tpy.

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 ₁₀	Yes	X		
SO ₂	Yes	X		
VOC	Yes	X		
NO _x	Yes	X		
CO	Yes	X		
TRS	Yes			X
H ₂ S	Yes			X
Individual HAP	Yes		X	
Total HAPs	Yes		X	

3. MACT Standards

This site has a synthetic minor status for HAPs. Amendment 2261-251-0008-V-02-3 limited emissions of any single HAP to less than 10 tons during any consecutive twelve months and emissions of any combination of HAPs to less than 25 tons during any twelve consecutive months. This limit established the facility as a synthetic minor source. The Title V Permit Conditions applicable toward this SM status are Condition Nos. 2.1, 4.1.3, 4.2.3, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13.

4. Program Applicability

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	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps

The facility will limit emissions of any single HAP to less than 10 tons during any consecutive twelve months and emissions of any combination of HAPs to less than 25 tons during any twelve consecutive months. This limit established the facility as a synthetic minor source for the avoidance of 40 CFR 63, particularly the MACT standards for Fabric Coating and Industrial Boilers.

B. Applicable Rules and Regulations

See narrative for Permit No. 2261-251-0008-V-01-0 (Application No. 9024).

C. Compliance Status

No compliance issues are noted.

D. Operational Flexibility

The facility has not requested operational flexibility.

E. Permit Conditions

Condition 2.1.1 limits the facility's HAP emissions.

III. Regulated Equipment Requirements

A. Brief Process Description

This plant is involved in the bleaching, dyeing, finishing and printing of cotton and manmade fabrics. There are four primary areas: preparation, dyeing, finishing, and printing. Based on the specific product required portions of each sub process can/will be used in numerous combinations to meet a customer specification. Preparation is used to increase dimensional stability, to remove chemicals used in the weaving or fiber preparation, to improve dye affinity/uptake, and to improve strength of the fabric. Several different steps are involved including singeing, desizing, heat setting, mercerization, bleaching, and washing. The dyeing department is a continuous process typically consists of dye application, dye fixation with chemicals or heat, washing, and drying. Printing can produce basic print patterns to complicated based on the amount of screens used and the number of dye colors. Finishing refers to any operations (other than preparation, dyeing, or printing) that improve the appearance and/or usefulness of fabric after it has been woven or knitted. Finishing encompasses any of several mechanical and chemical processes performed on fiber, yarn, or fabric to improve its appearance, texture, or performance. A continuous run of fabric in a finishing range begins by passing through a series of dry cans which

pre heat the fabric to allow for a more optimal absorption of the finishing chemicals. The fabric then passes through the finish pad where the chemicals are applied, a pre-dryer and then another set of dry cans before entering the tenter house. The tenter house uses tension to stretch the fabric to the desired width. The finish desired and the placement in the overall process is dependant on the conditions given by the customer. The entire plant has the option to run on propane if the natural gas supply is cut off.

This plant uses two boilers to provide the plant with the needed steam to run the process departments. Boiler B001 primarily uses natural gas with No. 6 fuel oil as a back-up fuel and has a heat input capacity of 150 MMBtu/hr. Boiler B002 primarily uses natural gas with No. 2 fuel oil as a back-up fuel and has a heat input capacity of 181 MMBtu/hr.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
B001	Babcock & Wilcox Boiler rated at 150 MMBtu/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 3.4.3, 5.2.2, 6.1.7, 6.2.5, 6.2.9, 6.2.10, 6.2.11, 6.2.12 and 6.2.13	None	NA
B002	Babcock & Wilcox Boiler rated at 181 MMBtu/hr	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR Part 60, Subpart Db	3.2.2, 3.3.1, 3.3.2, 3.3.3, 3.4.4, 3.4.5, 4.2.1, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.9, 6.2.10, 6.2.11, 6.2.12 and 6.2.13	None	NA
DNR1	Dye Narrow Range Pad Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
DWR1	Dye Wide Range Pad Application	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
FR40	Aztec Finishing Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
FR51	Aztec Finishing Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
FR58	Aztec Finishing Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
FR59	Aztec Finishing Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
FRL1	Flame Retardant Fabric Finishing Line 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.3, 3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, and 6.2.16	None	NA
FRL2	Flame Retardant Fabric Finishing Line 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.3, 3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, and 6.2.16	None	NA
PHS1	Heat Setting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
POW1	Preparation Open Width Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.2, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PRR1	Rope Range	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
PYP1	Yarn Preparation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA
P001	Zimmer Printer & Aztec Tubular Jet Print Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.4.2, 3.4.4, 3.4.6, 6.1.7, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.11, 6.2.12 and 6.2.13	None	NA

Tanks T003, T004 and T005 have been moved to the Insignificant Activities section of the permit because they are no longer subject to 40 CFR 60 Subpart Kb per the 2004 Amendment.

According to the renewal application, Emission Unit P002, the MBK Printer & Aztec Tubular Jet Print Dryer, has been removed from service, and subsequently removed from the equipment list.

C. Equipment & Rule Applicability

Emission and Operating Caps –

The addition of the flame retardant finishing lines causes an increase in VOC emissions of 39 tons per year. The PSD significant emissions level for VOC is 40 tons per year. To ensure that the facility does not exceed this level the appropriate monitoring, record keeping and reporting conditions have been added to ensure compliance with the 40 tons per year VOC limit on the new flame retardant finishing lines. This limit is established in Permit Amendment No. 2261-251-0008-V-02-3.

Applicable Rules and Regulations –

See narrative of Permit No. 2261-251-0008-V-01-0 (Application No. 9024) for Applicable Rules and Regulations for Boilers B001 and B002, Dye Ranges DNR1 and DWR1, Finishing Ranges FR40, FR51, FR58 and FR59, Heat Setting PHS1, Preparation Open Width Range POW1, Rope Range PRR1, Yarn Preparation Range PYP1, and Printers P001 and P002 (now removed). See Permit Amendment No. 2261-251-0008-V-02-3 (Application No. 16271) for Applicable Rules and Regulations for the Flame Retardant Fabric Finishing Lines FRL1 and FRL2.

D. Compliance Status

No compliance issues are noted.

E. Operational Flexibility

The facility has not requested operational flexibility.

F. Permit Conditions

Condition 3.2.1 defines the PSD avoidance emissions limit for Printer P001.

Condition 3.2.2 defines that only natural gas or distillate oil can be fired in Boiler B002 in accordance with Georgia Rule 391-3-1-.03(2)(c). This condition was updated slightly for clarity since No. 2 fuel oil and distillate oil are the same and very low sulfur oil is not defined.

Condition 3.2.3 defines the PSD avoidance emissions limit for Finishing Lines FRL1 and FRL2.

Permit Condition 3.3.1 is a generic condition which states that Boiler B002 is subject to all applicable requirements of 40 CFR 60 Subpart Db.

Condition 3.3.2 defines the maximum allowable sulfur content of the distillate fuel fired in boiler B002 not exceed 0.5 percent in accordance with 40 CFR 60.42b(j).

Condition 3.3.3 states that any gas discharged from Boiler B002 shall not contain particulate matter in excess of 0.10 pounds per million BTU heat input, as required by 40 CFR 60.43b, states the NO_x emission limit of 0.20 pounds per million Btu for boiler B001, as required by 40 CFR 60.44b(a)(1), and shall not exceed 20% opacity, as required by 40 CFR 60.43b(f).

Condition 3.4.1 defines the allowable PM emission rate from Boiler B001 in accordance with Georgia Rule 391-3-1-.02(2)(d)1.

Condition 3.4.2 defines the visible emission limit for equipment units subject to Georgia Rule 391-3-1-.02(2)(b)1. This condition was updated for flexibility by removing specific emission units.

Conditions 3.4.3 and 3.4.4 defines the allowable fuel sulfur content for equipment units subject to Georgia Rule 391-3-1-.02(2)(g)2. This condition was updated for flexibility by removing specific emission units.

Condition 3.4.5 defines the allowable PM emission rate from Boiler BB002 in accordance with Georgia Rule 391-3-1-.02(2)(d)2.

Conditions 3.4.6 defines the allowable PM emission limit for equipment units subject to Georgia Rule 391-3-1-.02(2)(e)1. This condition replaces previous Condition Nos. 3.4.7 through 3.4.12. This condition was updated for flexibility by removing specific emission units.

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

There are no exceptions to the General Testing Requirements.

B. Specific Testing Requirements**1. Individual Equipment:****Boiler – B002**

A performance test which uses the Continuous Monitoring System (CMS) will be performed for compliance of NO_x emission limitation in Condition 3.3.3(a). The calculation of the NO_x emission data will be based on a 30-day rolling average emission rate on a daily basis.

2. Equipment Groups (all subject to the same testing requirements):**Coating, Printing, Slashing, Dyeing and Finishing Operations**

The mass fraction of individual HAPs for each material used in these operations will be determined by either Method 311 or Method 24 on a quarterly basis or if a material compound is changed or added.

Condition 4.2.3 details test requirements to determine the mass fraction of “individual organic hazardous air pollutant” (IOHAP) for each material used in a textile coating, printing, slashing, dyeing, or finishing operation (including solvent blends) for the avoidance of 40 CFR 63 Subparts OOOO and DDDDD.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

There are no exceptions to General Monitoring Requirements.

B. Specific Monitoring Requirements**1. Individual Equipment:**Boiler – B002

- Condition 5.2.1.a requires that the opacity emissions from Boiler B002 be measured with a Continuous Opacity Monitoring System (COMS) per 40 CFR 60 Db. The installed system will be calibrated, maintained, and operated continuously. A record of results will also be maintained.
- Condition 5.2.1.b requires that a Continuous Monitoring System (CMS) measure NO_x emissions. King America Finishing, Inc. uses a Predictive Emissions Monitoring System (PEMS). An annual Relative Accuracy Test Audit (RATA) will be conducted with the results submitted to the Division within 30 days of completion of the RATA. The installed system will be calibrated, maintained, and operated continuously. A record of results will also be maintained.

Boiler – B001

- Condition 5.2.2 requires a check of visible emissions each day (or portion of day) that Boiler B001 burns residual oil. A record of results will also be maintained. The Title V Permit includes the requirements for conducting visible emissions.

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

Compliance Assurance Monitoring (CAM) is not applicable to any equipment since there are no control devices.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

There are no exceptions to General Record Keeping and Reporting Requirements.

Quarterly reports that include the identification of any excess emissions, excursions, and exceedances from applicable monitoring triggers, the cause of such occurrence, and the corrective action taken are required.

King America Finishing had requested semiannual reporting, but Georgia's *Procedures for Testing and Monitoring Sources of Air Pollutants* requires quarterly reporting for CEMS or COMS.

Condition No. 6.1.7 defines the excess emissions, exceedances, and the excursions for the facility. This is an existing condition in which the exceedances threshold for hazardous air pollutants and volatile organic compounds has been added. Added exceedances are as follows:

- Any twelve-consecutive month period during which emissions of a single HAP from the facility are equal to or greater than 10 tons or during which emissions of any combination of HAPS from the facility are equal to or greater than 25 tons.
- Any twelve-consecutive month period during which emissions of Volatile Organic Compounds from Flame Retardant Finishing Lines (Source Codes: FRL1 and FRL2) equals or exceeds 40 tons.

B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1, 6.2.2 and 6.2.3 require the facility to maintain records which include the following information for Boiler B002: Calendar date, the average hourly nitrogen oxides emission rates measured or predicted, the 30-day average nitrogen oxides emissions rates calculated at the end of each operating day from measure or predicted hourly nitrogen oxide emission rates for the preceding 30 operating days, Identification of the operating days for which pollutant data have not been obtained including reasons and corrective actions taken, identification of the times when emission data have been excluded from the calculation of average emission rates and reasons. These records will be submitted with the quarterly reports required by Condition 6.1.7.

Condition 6.2.3 requires that the amount of each fuel combusted each day be recorded. The annual capacity factor should be calculated quarterly for natural gas and distillate oil separately.

Condition 6.2.4 requires the facility to comply with the fuel sulfur limit by maintaining fuel supplier certifications which include the name of the supplier and a statement from the supplier stating that the oil complies with specifications. These records will be submitted quarterly to the Division.

Condition 6.2.5 requires the facility to obtain certification from the supplier on the sulfur content of the fuel oil for Boiler B001. The certification will include the name of the supplier, the location of the oil when sampled for analysis, the sulfur content, the method used for this determination and the quantity of fuel oil delivered.

Condition 6.2.6 requires the facility will maintain monthly usage records of all materials containing volatile organic compounds used in Printer P001. These records shall include the total weight of each material used, the volatile organic compound content of each material (expressed as a weight percentage), and the weight of any material disposed as waste. All calculations used to figure usages should be kept as part of the monthly record. These usage records shall be kept available for inspection or submittal for five years from the date of record.

Conditions 6.2.7 and 6.2.8 require the monthly usage records will be used to calculate total monthly volatile organic compound emission from Printers P001 and P002. The facility will notify the Division in writing if the volatile organic compound emissions exceed 3.33 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the facility intends to maintain compliance the emission limit.

Condition 6.2.9 requires the facility to maintain usage records of all materials containing hazardous air pollutants (HAPs) utilized at the facility for each calendar month. These records shall include the total weight of each material used and the hazardous air pollutants content of each material (expressed as a weight percentage).

Condition 6.2.10 requires the facility to record and maintain records of the amounts of natural gas and fuel oil combusted each calendar month in boilers B001 and B002.

Conditions 6.2.11 and 6.2.12 require the facility to use the usage records required in Condition Nos. 6.2.9 and 6.2.10 to calculate, each calendar month, total individual and combined HAP emissions from the entire facility and notify the Division when the monthly totals of individual HAP emissions or combined HAP emissions exceed 1/12 of the allowable in Condition 2.1.1. The facility is required to calculate the 12-month rolling totals and notify the Division when individual HAP 12-month rolling total limit of 10 tons is exceeded or when the combined HAP 12-month rolling total limit of 25 tons is exceeded.

Condition 6.2.13 requires the facility to submit as a part of their quarterly reports a report prepared from records retained in Condition Nos. 6.2.10 and 6.2.12.

Condition 6.2.14 requires the facility to maintain usage records of all materials containing volatile organic compounds (VOC) utilized in Flame Retardant Finishing lines FRL1 and FRL2 for each calendar month. These records shall include the total weight of each material used and the hazardous air pollutants content of each material (expressed as a weight percentage).

Condition 6.2.15 requires the facility to calculate monthly emission of VOC from Flame Retardant Finishing Lines and submit with the quarterly reports.

Condition 6.2.16 requires the facility notify the Division when the monthly totals of VOC emissions exceed 3.33 tons during any calendar month. The facility is required to calculate the 12-month rolling totals and notify the Division when the VOC limit of 40 tons per year is reached or exceeded.

VII. Specific Requirements

A. Operational Flexibility

- Not Applicable.

B. Alternative Requirements

- No alternative requirements were requested.

C. Insignificant Activities

- A list of insignificant activities is attached at the end of the Title V permit.

D. Temporary Sources

- None Applicable.

E. Short-Term Activities

- None Applicable.

F. Compliance Schedule/Progress Reports

- No compliance schedule or progress reports are necessary.

G. Emissions Trading

- Not Applicable.

H. Acid Rain Requirements

- Not Applicable.

I. Prevention of Accidental Releases

- Refer to the narrative for Title V Permit No. 2261-251-0008-V-01-0.

J. Stratospheric Ozone Protection Requirements

- Not Applicable.

K. Pollution Prevention

- There are no pollution prevention provisions incorporated into this Title V permit.

L. Specific Conditions

- Not Applicable.

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.

Addendum to Narrative

The 30-day public review started on April 19, 2007 and ended on May 18, 2007. Comments were not received by the Division.