



STATEMENT OF BASIS

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BAQ Engineering Services Division
 2600 Bull Street, Columbia, SC 29201
 Phone: 803-898-4123 Fax: 803-898-4079

Company Name:	JPS Composite Materials Corp	Permit Writer:	David D. Abusah
Permit Number:	CM-1200-0017	Date:	January 26, 2009

DATE APPLICATION RECEIVED: January 14, 2009, February 2, 2009, August 27, 2009 and October 7, 2009

DATE OF LAST INSPECTION: September 9, 2008 No violations of permit requirements or applicable regulations were observed during this inspection.

FACILITY DESCRIPTION: This facility manufactures fiberglass cloth for electronics, aerospace, and other industries.

PROJECT DESCRIPTION: Renewal of the CM Operating Permit. The facility has also requested that the following units should be removed from the permit since they are no more in service.

1. Batch Cleaning Oven No. 1 (Unit ID 01)
2. Batch Cleaning Oven No. 2 (Unit ID 02)
3. Lanley oven; equipment ID R2-4 under Finishing Range No. 2 (Unit ID 12)
4. Finishing Range No. 4 (Unit ID 14)
5. Finishing Range No. 7 (Unit ID 16)
6. Finishing Range No. 10 (Unit ID 18)

CHANGES SINCE LAST OP ISSUANCE : On September 27, 2007, the facility's CM Operating Permit was re-issued to incorporate following.

1. Change in facility's name.
2. Revised the exemption basis for Sources A through F in Section 7.0 to reflect the change in SC Regulations 61-62.1, effective May 25, 2007.
3. Facility was granted an exemption on March 13, 2009 to re-route the exhaust from Finishing Range 12 (Unit ID 20) through the Coalescing Filter for the control of PM.

SPECIAL CONDITIONS, MONITORING, LIMITS: Boiler #1 (unit ID 08) is subject to No. 5 & 6 or total of No. 5 and 6 fuel oil limit of 600,546 gallons per year in order to be in compliance with the SO₂ and PM₁₀ limits. The weekly visual inspection condition on unit ID 08 has been removed from the permit since the facility is currently operating with CM Operating Permit and has not been in violation of any permitting conditions at this time.

PUBLIC NOTICE: This is a renewal of the facility's CM Operating Permit; the draft permit would be public noticed in accordance with S.C. Regulation 61-62.1, Section II (N).

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
03	PM/PM ₁₀	0.4259	1.865	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0007	3.07E-03	
	NO _x	0.1176	0.515	
	CO	0.0988	0.433	
	VOC	0.4235	1.855	
04	PM/PM ₁₀	0.4349	1.905	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0014	6.13E-03	
	NO _x	0.2353	1.031	
	CO	0.1979	0.867	
	VOC	0.0129	0.0565	
05	PM/PM ₁₀	0.4349	1.905	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0014	6.13E-03	
	NO _x	0.2353	1.031	
	CO	0.1979	0.867	
	VOC	0.0129	0.0565	
06	PM/PM ₁₀	0.0179	0.078	AP-42, 5 th Edition & Engineering



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ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
	SO ₂	0.0014	6.13E-03	Calculations
	NO _x	0.2353	1.031	
	CO	0.1979	0.867	
	VOC	1.4329	6.276	
	Methanol	1.4113	6.181	
	HAP	1.4200	6.220	
	PM/PM ₁₀	0.0179	0.078	
07	SO ₂	0.0014	6.13E-03	AP-42, 5 th Edition & Engineering Calculations
	NO _x	0.2353	1.031	
	CO	0.1979	0.867	
	VOC	1.4329	6.276	
	Methanol	1.4113	6.181	
	HAP	1.4200	6.220	
	PM/PM ₁₀	4.855/4.248	21.27/18.61	
08	SO ₂	66.643	291.896	AP-42, 5 th Edition, Section 1.3
	NO _x	11.117	48.693	
	CO	1.011	4.428	
	VOC	0.0566	0.248	
	PM/PM ₁₀	0.1559	0.683	
09	SO ₂	0.0123	0.054	AP-42, 5 th Edition, Section 1.4
	NO _x	2.051	8.983	
	CO	1.723	7.547	
	VOC	0.113	0.495	
	PM/PM ₁₀	0.0596	0.261	
10	SO ₂	0.0047	0.021	AP-42, 5 th Edition & Engineering Calculations
	NO _x	0.7843	3.435	
	CO	0.6587	2.885	
	VOC	1.8931	8.292	
	Methanol	0.1144	0.501	
	HAP	1.85	8.103	
	PM/PM ₁₀	0.0183	0.0801	
11	SO ₂	0.0014	6.13E-03	AP-42, 5 th Edition & Engineering Calculations
	NO _x	0.2402	1.053	
	CO	0.2018	0.884	
	VOC	1.0413	4.561	
	Methanol	0.7557	3.310	
	HAP	0.7557	3.310	
	PM/PM ₁₀	5.6534	24.762	
12	SO ₂	0.0106	0.046	AP-42, 5 th Edition, Section 1.4
	NO _x	1.7539	7.682	
	CO	1.4733	6.453	
	VOC	0.0965	0.423	
	PM/PM ₁₀	0.0186	0.081	
13	SO ₂	0.0015	6.57E-03	AP-42, 5 th Edition & Engineering Calculations
	NO _x	0.2451	1.074	
	CO	0.2059	0.902	
	VOC	0.7733	3.387	
	Methanol	0.7633	3.343	
	HAP	0.7633	3.343	



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UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)

ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
15	PM/PM ₁₀	3.5247	15.438	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0020	8.76E-03	
	NO _x	0.3255	1.426	
	CO	0.2734	1.197	
	VOC	15.048	65.910	
	Methanol	2.3300	10.205	
	HAP	2.3300	10.205	
17	PM/PM ₁₀	7.0551	30.901	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0028	0.0123	
	NO _x	0.4617	2.022	
	CO	0.3879	1.699	
	VOC	0.0254	0.111	
19	PM/PM ₁₀	5.4468	23.857	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0041	0.0180	
	NO _x	0.6863	3.006	
	CO	0.5765	2.525	
	VOC	2.1377	9.363	
	HAP	0.2201	0.964	
20	PM/PM ₁₀	0.0149	0.0653	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	0.0012	5.26E-03	
	NO _x	0.1961	0.859	
	CO	0.1647	0.721	
	VOC	2.1402	9.374	
	HAP	0.2102	0.921	

CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)

ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
19	PM/PM ₁₀	0.2697	1.181	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	N/A	N/A	N/A
	NO _x	N/A	N/A	N/A
	CO	N/A	N/A	N/A
	VOC	0.1069	0.468	AP-42, 5 th Edition & Engineering Calculations
	HAP	N/A	N/A	N/A
20	PM/PM ₁₀	7.45E-04	3.26E-03	AP-42, 5 th Edition & Engineering Calculations
	SO ₂	N/A	N/A	N/A
	NO _x	N/A	N/A	N/A
	CO	N/A	N/A	N/A
	VOC	0.1070	0.469	AP-42, 5 th Edition & Engineering Calculations
	HAP	N/A	N/A	N/A



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FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
PM/PM ₁₀	122.88/120.22	<100
SO ₂	292.10	<100
NO _x	82.87	N/A
CO	33.15	N/A
VOC	116.69	<100
Methanol	29.72	<10
Total HAP	39.29	<25

PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)			
Section II(E): Synthetic Minor	Y		The facility's PTE PM, SO ₂ , VOC and single/total HAP for TV are greater than the major source threshold. The facility has taken federally enforceable limits on these pollutants in order to limit their PTE to below major source threshold. .
Section II(G): Conditional Major	Y		The facility's PTE for criteria pollutants and HAP are greater than major source threshold. The facility has accepted federally enforceable limits in order to limit these pollutants to below the major source threshold and has submitted an application for CM permit.
Standard 1: Fuel Burning Operations	Y		Unit IDs 08 & 09 are subject to PM, SO ₂ and 40% opacity limit
Standard 2: Ambient Air Quality Standards	Y		The facility has demonstrated compliance through modeling; see modeling summary dated August 5, 2009. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 3: Waste Combustion/Reduction (state only)		X	The processes at the facility do not contain waste combustion or reduction sources.
Standard 3.1: HMI Waste Incinerators		X	The processes at the facility do not involved medical/infectious waste incineration
Standard 4: Emissions from Process Industries	Y		Unit ID 03, 04, 05, 06, 07, 10, 11, 12, 13, 15, 17, 19 & 20 are subject to PM and 20% opacity limit.
Standard 5: Volatile Organic Compounds		X	Facility was in existence prior to July 1, 1979 and None of the processes, which are regulated by this regulation, apply.
Standard 5.1: BACT/LAER For VOC (state only)		X	The facility was constructed before July 1, 1979. Facility has taken federally enforceable limit on VOC to be less than 100 TPY. Therefore, facility is not subject to LAER at this time.
Standard 5.2: Control of Oxides of Nitrogen		X	Source was permitted to construct before 06/25/2004.
Standard 7: Prevention of Significant Deterioration		X	The facility's PTE for SO ₂ is greater than 250 TPY; however facility has taken limits on SO ₂ to be less than 100 TPY. Therefore facility is not subject to PSD.
Standard 7(c): Ambient Air Increments	Y		The facility has demonstrated compliance through modeling for the PSD Class II increments for Greenville County; see modeling summary dated August 5, 2009. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 7.1: Standards for Non Attainment Areas		X	The facility is not located in a non-attainment area.



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
Standard 8: Toxic Air Pollutants (state only)	Y		The facility has demonstrated compliance through modeling for all TAP; see modeling summary dated August 5, 2009. No operational restriction has been established to ensure compliance with the modeled emission rates.
Regulation 61-62.6: Control of Fugitive Particulate Matter		X	This facility does not have fugitive PM (dust) emissions.
Regulation 61-62.60: SC Designated Facility Plan and NSPS		X	This facility does not contain any sources that are subject to this standard.
Regulation 61-62.61: NESHAP		X	This facility does not contain any process/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclei, radon or vinyl chloride)
Regulation 61-62.63: NESHAP For Source Categories		X	The facility's uncontrolled HAP is greater than 10TPY for single HAP and 25 TPY for total HAP. However, the facility has taken limits on HAP to be <10/25 TPY. Therefore the facility is minor for HAP and not subject to Subpart NNN-National Emission Standards For Hazardous Air Pollutants For Wool Fiberglass Manufacturing.
Regulation 61-62.68: Chemical Accident Prevention		X	This facility does not store or use chemicals subject to 112(r) above threshold quantities.
Regulation 61-62.70: Title V		X	The facility's PTE for Title V determination is greater than the major source thresholds for PM, SO ₂ , VOC and HAP. The facility has taken limits to be < 100 TPY for criteria pollutants and <10/25 TPY for single/total HAP.
Regulation 61-62.72: Acid Rain		X	None of the facility's sources are an industrial utility unit.
Regulation 61-62.96: Nitrogen Oxides (NO_x) Budget Trading Program		X	The facility does not participate in NO _x emission trading.
Regulation 61-62.99: Nitrogen Oxides (NO_x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	This requirement applies to Kiln only.

Federal Regulations (PROJECT ONLY)

NSPS (Part 60) Subpart(s)		X	This facility does not contain any sources that are subject to this standard.
NESHAP (Part 61) Subpart(s)		X	This facility does not contain any process/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclei, radon or vinyl chloride)
MACT (Part 63) Subpart(s)		X	The facility's uncontrolled HAP is greater than 10TPY for single HAP and 25 TPY for total HAP. However, the facility has taken limits on HAP to be <10/25 TPY. Therefore the facility is minor for HAP and not subject to Subpart NNN-National Emission Standards For Hazardous Air Pollutants For Wool Fiberglass Manufacturing.
Area Source Standards (Part 63) Subpart(s)		X	The processes at the facility are not subject to Area Source MACT.
Compliance Assurance Monitoring (CAM) (Part 64)		X	Not a Title V facility

SUMMARY AND CONCLUSIONS



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It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

draft