



**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:**  
**Permit Number:**

Carlisle Finishing, LLC  
 TV-2180-0003

**Permit Writer:**  
**Date:**

David D. Abusah  
 DRAFT

**DATE APPLICATION RECEIVED:** January 31, 2005, Sept 01, 2006, February 28, 2007, December 27, 2007, January 30, 2008, and March 14, 2008.

**DATE OF LAST INSPECTION:** June 24, 2009; A follow-up inspection will be conducted to ensure that visible emissions from the scrubber do not exceed 40% opacity. The compliance status of the facility will be determined upon completion of the follow up inspection.

**FACILITY DESCRIPTION:** This facility operates a textile finishing mill in Carlisle, South Carolina. ‘Gray’ goods are bleached, dyed and printed according to customer specifications. A textural finish is also applied according to specifications from the customer. The major processes associated with the facility production include lay-out and sewing of greige goods, preparation, dyeing and finishing. There is also steam generation from the four (4) existing boilers which are used in textile production. Three (3) of the boilers can operate on either coal or natural gas and the fourth boiler operates on natural gas with propane as a back-up fuel. The PM emissions from the three coal fired boilers are controlled by three multi-clones; one for each boiler, and a Scrubber for the control of HCl.

**PROJECT DESCRIPTION:** This is the review of the facility’s Title V operating permit renewal. This renewal will also incorporate the following:

1. An Operation Permit for one 4.2 million BTU/hr natural gas fired Make up Air Heater Construction Permit No. 2180-0003-CM.
2. An Operation Permit for the replacement of Flash Ager Construction Permit No. 2180-0003-CN.
3. An Operation Permit for a new scrubber to control HCl emissions (SCR1) from the facility’s three (3) existing coal fired boilers as per Condition Number 6 of the Synthetic Minor Construction Permit No. 2180-0003-CO.
4. Change Environmental Contact from Richard Young to Jeffery Haire.
5. The phrase ‘pressure drop’ in Conditions 15 and 17 of Construction Permit 2180-0003-CO was replaced with the phrase ‘in-let pressure’.

**ADDITIONAL INFORMATION:** On April 29, 2008, we (David Abusah, Elton Guinyard and Carolyn Starz) went on a facility visit to Carlisle Finishing, LLC; we saw a skeletal staff working on a small request from a client. It was observed that most of the equipments were lying idle on the facility’s premises. Even with few equipments working at that time; except the coal fired boilers, the rest of the equipments does not raised any air pollution concerns. This have confirmed the earlier statements made by Mr. Jeffery Haire (Carlisle’s Environmental Manager) that the facility’s production levels have fallen appreciably below average. In view of these; frequent monitoring and record keeping of opacity, PM and VOC for Unit IDs 03 -11 are not necessary. Instead, the facility will monitor these pollutants and their records on monthly basis to demonstrate compliance.

**SOURCE TEST REQUIREMENTS:** Source test to be conducted on the coal fired boilers (Unit ID 01) every two years in accordance with to SC Regulation 61-62.5 Standard No. 1, Section VI.

**PUBLIC NOTICE:** Facility has requested for renewal of their TV Operating Permit; the draft permit will be public noticed in accordance with S.C. Regulation 61-62.1, Section II (N).

**COMMENTS FROM FACILITY:**

No.	Comments	Action Taken
1.	Part 5.0.B, Condition GC 3: To add the word ‘required’ to the Line 1 of the condition.	The word ‘required’ was added to Line 1 of condition GC3 which now read; ‘The owner/operator shall maintain on file all <u>required</u> measurements including continuous monitoring.
2.	Part 5.0.B, Unit ID 03: This process uses a citrus based low VOC surfactant (solvent) that operates on an infrequent basis. No visible emissions are associated with the operation.	Opacity and PM monitoring and record keeping removed from the permit.
3.	Part 5.0.B, Unit ID 04: Equipment IDs LSH1 and LSH2 are HVAC units for heating the room. Each of these is an insignificant source. Also the units are not associated with the Lint Collection Unit (Control Device LSL1)	Leave equipment IDs LSH1 and LSH2 as they were in the permit and they are not subject to monitoring and record keeping requirements.
4.	Part 5.0.B, Unit ID 04: LSL1 is a lint collection unit from exhaust hoods	Opacity and PM monitoring and record keeping



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	over the plant incoming fabric batching and sewing (layout and sew). Lint is exhausted through the filter. Therefore, there are no visible emissions from this process.	requirements have been removed from the permit.
5.	Part 5.0.B, Unit ID 05: Preparation processes with equipment IDs PRH1, PRH2 and PRH3 are HVAC units for heating the room. Each of these is an insignificant source. Equipment ID PRFA is a mixing area and emissions are insignificant. Preparation processes with equipment IDs PR11, PR21, PR22, PR23, PR33, PR34 and PRFA are wet processes and have insignificant emissions. Equipment ID PR32 (Mercerizing Range #32) has been removed from site.	Leave preparation process equipment IDs PRH1, PRH2, PRH3, PRFA, PR23, PR33 and PR34 as they are in the permit with no visual monitoring and record keeping requirement. Equipment IDs PR11, PR21, PR22, PR23, PR33, PR34 and PRFA are not subject to PM limits.  Equipment ID PR32 deleted from permit.
6.	Part 5.0.B, Unit ID 06: Equipment ID KNF is the mixing area which has insignificant emissions and should be listed as such. Equipment ID KN06 has no previous opacity monitoring requirements therefore asking for monthly monitoring.	Leave equipment ID KNF as it was in the permit with no visual monitoring and record keeping requirements. Reduce the opacity monitoring and record keeping for KN06 to monthly.
7.	Part 5.0.B; Unit ID 07: Equipment ID DY01, DY03, DY04, DY06 and DY08 are all insignificant sources. Processes taking place in equipment ID DY12 and DY14 are in a wet medium therefore insignificant source of PM and should be listed as such without monitoring requirements. Equipment ID DYFA is a mixing area which has insignificant emissions. Equipment ID DY02, DY11 and DY13 have been removed from facility.	Leave equipment IDs DY01, DY03, DY04, DY06, DY08, DY11-14 and DYFA as they were in the permit. The weekly opacity monitoring and record keeping for equipment IDs DY01, DY03, DY04, DY06, and DY08 has been revised to monthly. Equipment IDs DY12 and DY14 are not subject to visual monitoring, record keeping and PM limits.  Equipment ID DY02, DY11 and DY13 deleted from the permit.
8.	Part 5.0.B; Unit ID 07, Condition 07.5: The permit should not specify which method is used to maintain compliance. The condition should be general requiring compliance with the MACT so that they can use other options listed in the MACT without going through a permit modification.	This condition was modified by using a general language in the permit.
9.	Part 5.0.B; Unit 08: Equipment ID SPH01-07 are HVAC units for heating the area and are insignificant sources of emission. Equipment ID SEFB is the mixing area and equipment ID SCE is a screen cleaning area using a citrus based cleaner with insignificant source of emissions.	Leave equipment IDs SPH01-07, SEFB and SCE as they are in the permit with no visual monitoring and record keeping requirements.
10.	Part 5.0.B; Unit ID 08, Condition 08.5: The permit should not specify which method is used to maintain compliance. The condition should be general requiring compliance with the MACT so that they can use other options listed in the MACT without going through a permit modification.	This condition was modified by using a general language in the permit.
11.	Part 5.0.B; Unit ID 09: Equipment ID SCW, SWFB TSOW and SW11-14 are insignificant sources and have no prior monitoring requirements. In addition, equipment SWFB is a mixing area with no visible emissions and no stack. SCW is a screen cleaning area using a citrus based cleaner with no visible emissions and no stack. TSOW is a laboratory sample print area with no visible emissions and no stack. These equipments should be listed as such with no visual monitoring or record keeping. Equipment ID SCW has been used to repair equipment ID SCE. Hence equipment SCW no longer exists.	Leave the equipment IDs SCW, SWFB TSOW and SW11-14 as they were in the permit with no visual monitoring, record keeping and PM limits.  Equipment ID SCW deleted from permit.
12.	Part 5.0.B; Unit ID 09, Condition 09.4: The permit should not specify which method is used to maintain compliance. The condition should be general requiring compliance with the MACT so that they can use other options listed in the MACT without going through a permit modification.	This condition was modified by using a general language in the permit.
13.	Part 5.0.B; Unit ID 10 (Ageing and Soaping): Ageing unit use acetic acid in water or steam/heat to set the dye. Soaping units are washers that use water and detergent. All equipments listed under this unit are insignificant	Leave equipments listed under this unit as they were. The weekly opacity monitoring and record keeping has been revised to monthly. Unit not subject to



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	sources of PM, opacity and VOC. Also equipment ID ASF is a mixing area which has no visible emissions and no stack. Therefore, equipment ASF should have no visual monitoring or record keeping.	VOC conditions because VOC emission is low. Also equipment ID ASF has no visual monitoring, record keeping and PM limit requirements.
14.	Part 5.0.B; Unit ID 11: Equipment ID FNM1 is an air make up unit with an insignificant source of emission. Process equipment ID FN32-FN34, FN39-FN41, FN51 and FN22, FN24-FN26 are Sanforizers and Calenders are machines that apply steam, pressure and/or heat (by way of heated rolls) to the fabric. These processes have no visible emissions and no stacks; hence should have no visual monitoring or record keeping. Equipment IDs FN23 and FN35 have been removed.	Leave equipments IDs FN32-FN35, FN39-FN41, FN51 and FN22-FN26 as they were in the permit with no visual monitoring, record keeping and PM limits.  Equipment IDs FN23 and FN35 deleted from permit.

**EMISSIONS**

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM/PM <sub>10</sub>	687.50/137.50	3011/602	AP-42, 5 <sup>th</sup> Ed. Tables 1.1-3,-4
	SO <sub>2</sub>	395.83	1734	AP-42, 5 <sup>th</sup> Ed. Tables 1.1-3,-4
	NO <sub>x</sub>	114.58	502	AP-42, 5 <sup>th</sup> Ed. Tables 1.1-3,-4
	CO	52.08	228	AP-42, 5 <sup>th</sup> Ed. Tables 1.1-3,-4
	HCl	12.50	54.75	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
02	PM/PM <sub>10</sub>	0.94	4.1	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.073	0.32	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	9.13	40	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	2.51	11	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
03	PM/PM <sub>10</sub>	0.032	0.14	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.0023	0.01	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	0.43	1.89	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	0.36	1.59	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	VOC	0.23	0.1	Mass Balance
	Boron Trifluoride	0.108	0.47	Mass Balance & Engineering Calculation
04	PM/PM <sub>10</sub>	1.93	8.45	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.0023	0.01	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	0.38	1.65	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	0.32	1.39	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	VOC	0.021	0.09	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
05	PM/PM <sub>10</sub>	0.49	2.16	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.039	0.17	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	6.49	28.44	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	5.45	23.89	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	VOC	90.41	396	Mass Balance
	Caustic Soda	14.66	64.23	Mass Balance
06	PM/PM <sub>10</sub>	0.31	1.36	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.016	0.07	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	2.86	12.52	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	0.66	2.91	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	VOC	54	236.5	Mass Balance
	Caustic Soda	0.080	0.35	Mass Balance
	Formaldehyde	0.91	4.0	Mass Balance
	Chlorine	0.080	0.35	Mass Balance
07	PM/PM <sub>10</sub>	0.28	1.23	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	SO <sub>2</sub>	0.021	0.09	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	NO <sub>x</sub>	3.72	16.29	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations
	CO	3.12	13.67	AP-42, 5 <sup>th</sup> Ed. & Engineering Calculations



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**UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)**

ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
	VOC	477.17	2090	Mass Balance
	Caustic Soda	0.48	2.09	Mass Balance
	Formaldehyde	1.91	8.36	Mass Balance
	Ethylene Glycol	2.86	12.54	Mass Balance
	Chlorine	0.95	4.18	Mass Balance
	Oxalic Acid	0.48	2.09	Mass Balance
	Methanol	0.48	2.09	Mass Balance
	2-Butoxyethanol	1.91	8.36	Mass Balance
	Phosphoric Acid	0.48	2.09	Mass Balance
08	PM/PM <sub>10</sub>	0.47	2.08	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	SO <sub>2</sub>	0.037	0.16	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	NOx	6.24	27.33	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	CO	5.24	22.96	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	VOC	1728.31	7570	Mass Balance
	Caustic Soda	3.24	14.2	Mass Balance
	Formaldehyde	16.21	71	Mass Balance
	Ethylene Glycol	61.60	269.8	Mass Balance
09	PM/PM <sub>10</sub>	0.13	0.58	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	SO <sub>2</sub>	0.011	0.05	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	NOx	1.76	7.69	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	CO	0.79	3.48	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	VOC	768.04	3364	Mass Balance
	Caustic Soda	1.44	6.3	Mass Balance
	Formaldehyde	7.19	31.5	Mass Balance
	Ethylene Glycol	27.40	120	Mass Balance
10	PM/PM <sub>10</sub>	0.053	0.23	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	SO <sub>2</sub>	0.0046	0.02	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	NOx	0.69	3.01	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	CO	0.58	2.52	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	VOC	42.92	188	Mass Balance
	Caustic Soda	8.58	37.6	Mass Balance
	Oxalic Acid	0.95	4.18	Mass Balance
11	PM/PM <sub>10</sub>	0.43	1.88	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	SO <sub>2</sub>	0.034	0.15	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	NOx	5.61	24.57	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	CO	4.66	20.41	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
	VOC	450.23	1972	Mass Balance
	Formaldehyde	9.00	39.4	Mass Balance

**CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)**

ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	PM/PM <sub>10</sub>	125/81.25	548/356	AP-42, 5 <sup>th</sup> Ed. Tables 1.1-3,-4
	SO <sub>2</sub>	N/A	N/A	N/A
	NOx	N/A	N/A	N/A
	CO	N/A	N/A	N/A
	HCl	2.50	10.95	AP-42, 5 <sup>th</sup> Ed. &Engineering Calculations
03	PM/PM <sub>10</sub>	N/A	N/A	N/A
	SO <sub>2</sub>	N/A	N/A	N/A



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<b>CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)</b>				
<b>ID</b>	<b>Pollutant</b>	<b>lb/hr</b>	<b>TPY</b>	<b>Method for Estimating Emissions</b>
	NO <sub>x</sub>	N/A	N/A	N/A
	CO	N/A	N/A	N/A
	VOC	N/A	N/A	N/A
	Boron Trifluoride	0.011	0.05	Mass Balance & Engineering Calculations
08	PM/PM <sub>10</sub>	N/A	N/A	N/A
	SO <sub>2</sub>	N/A	N/A	N/A
	NO <sub>x</sub>	N/A	N/A	N/A
	CO	N/A	N/A	N/A
	VOC	1726	7560	Mass Balance
	Caustic Soda	N/A	N/A	N/A
	Formaldehyde	N/A	N/A	N/A
	Ethylene Glycol	N/A	N/A	N/A

N/A= Not Applicable

<b>FACILITY WIDE EMISSIONS</b>		
<b>Pollutant</b>	<b>Uncontrolled Emissions</b>	<b>Controlled Emissions</b>
	<b>TPY</b>	<b>TPY</b>
PM/ PM <sub>10</sub>	3033/602	548/356
SO <sub>2</sub>	1735.05	N/A
NO <sub>x</sub>	1167.39	N/A
CO	126.82	0.32
HCl	54.75	2.52
VOC	15816.69	N/A
Caustic Soda	124.77	N/A
Formaldehyde	154.26	N/A
Ethylene Glycol	402.34	N/A
Chlorine	4.53	N/A
Oxalic Acid	6.27	N/A
2-Butoxyethanol	8.36	N/A
Methanol	2.09	N/A
Phosphoric Acid	2.09	N/A
Boron Trifluoride	0.47	0.05

N/A = Not Applicable

**INSIGNIFICANT ACTIVITIES**

<b>FACILITY WIDE</b>		
<b>ID</b>	<b>General Description</b>	<b>Basis</b>
1	Maintenance - brazing, soldering and welding equipment used for regular maintenance	Insignificant Activities List A
2	End Ring Cleaning - clean end rings	< 5 tons/year criteria pollutants, < 1000 pounds/year toxics
3	Diesel Water Pump - pump for fire sprinkler	Insignificant Activities List A
4	General Housekeeping Services - includes painting, roofing, and paving plus associated materials	Insignificant Activities List A
5	75 kW Emergency Power Generator - emergency lighting	S.C. Reg. 61-62.1 Section II, B,2, (f)(i)
6	Laboratory - used for chemical analyses	Insignificant Activities List A
7	Space Heaters	S.C. Reg. 61-62.1 Section II, B,2 (a)
8	Stork Steamer #52	S.C. Reg. 61-62.1 Section II, B,2 (g)



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<b>PROJECT REGULATORY APPLICABILITY REVIEW</b>			
<b>Regulation</b>	<b>Applicable</b>		<b>Comments</b>
	<b>Yes</b>	<b>No</b>	
<b>South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)</b>			
<b>Section II(E): Synthetic Minor</b>		X	The facility's PTE of regulated pollutants is greater than major source threshold and it already have Title V permit.
<b>Section II(G): Conditional Major</b>		X	This is a Title V facility and has got a Title V permit.
<b>Standard 1: Fuel Burning Operations</b>	X		Unit I.D. 01, 02: These processes have PM, SO <sub>2</sub> and Opacity limits imposed by this standard. Opacity limit is 40% for unit 01 and 20% for unit 02.
<b>Standard 2: Ambient Air Quality Standards</b>	X		This facility has demonstrated compliance through modeling; see modeling summary dated 2/3/06.
<b>Standard 3: Waste Combustion/Reduction (state only)</b>		X	No Waste Combustion/Reduction is involved
<b>Standard 3.1: HMI Waste Incinerators</b>		X	Facility does not operate hospital/medical/infectious waste incinerators.
<b>Standard 4: Emissions from Process Industries</b>	X		These sources I.D. 03, 04, 05, 06, 07, 08, 09, 10, and 11 are subject to PM and 20% opacity limit standards.
<b>Standard 5: Volatile Organic Compounds</b>	X		All pre-1979 (Unit IDs 08 and 09) coating applicator systems are subject to this standard under Section II, Part C.1.a (Surface Coating of Paper, Vinyl, and Fabric). This condition limits VOC coating content to less than 2.9 pounds of VOC/gallon of coating excluding water and exempt solvents, delivered to the fabric or paper coating applicator system.
<b>Standard 5.1: BACT/LAER For VOC (state only)</b>		X	The facility was built before July 1, 1979 and baseline determination for the July 1, 1979 emission was 1,747.2TPY of VOC. Hence the BACT/LAER trigger limit is 1,847.2 TPY of VOC. With the installation of the new scrubber on unit I.D. 01; the facility's baseline determination and actual VOC emission does not exceed 1,847.2 TPY. Therefore facility is not subject to BACT/LAER at this time.
<b>Standard 5.2: Control of Oxides of Nitrogen</b>		X	The source was constructed before 06/25/2004.
<b>Standard 7: Prevention of Significant Deterioration</b>	X		The facility's PTE for criteria pollutants is > 250 TPY hence it is major for PSD; meanwhile in 1998; the facility has installed low NOx burners on Unit ID 02 to limit the boiler emissions to below the PSD significant increase level for NOx thereby allowing all the four boilers to operate simultaneously.
<b>Standard 7(c): Ambient Air Increments</b>	X		This facility has demonstrated compliance through modeling; see modeling summary dated 2/3/06.
<b>Standard 7.1: Standards for Non Attainment Areas</b>		X	This facility is not located in a Non-Attainment area.
<b>Standard 8: Toxic Air Pollutants (state only)</b>	X		This facility has demonstrated compliance through modeling; see modeling summary dated 2/3/06.
<b>Regulation 61-62.6: Control of Fugitive Particulate Matter</b>		X	This facility does not have fugitive PM emissions
<b>Regulation 61-62.60: SC Designated Facility Plan and NSPS</b>		X	This facility does not contain sources subject to any NSPS standards.
<b>Regulation 61-62.61: NESHAP</b>		X	This facility does not contain any processes/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).



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**PROJECT REGULATORY APPLICABILITY REVIEW**

Regulation	Applicable		Comments
	Yes	No	
<b>Regulation 61-62.63:</b> NESHAP For Source Categories	X		This facility is a major source for HAP. However, this facility has taken federally enforceable limits of < 10 TPY of a single HAP and < 25 TPY of total HAP to avoid being subject to Subpart DDDDD-(Industrial, Commercial & Institutional Boilers and Space Heaters). Meanwhile; unit I.Ds. 07, 08, 09, and 11 are subject to Subpart OOOO- (Printing, Coating, Slashing, Dyeing or Finishing of fabric and other textiles). Facility plan to use compliant material option or other options listed in the MACT to remain in compliance in the MACT.
<b>Regulation 61-62.68:</b> Chemical Accident Prevention		X	The facility does not store or use chemicals subject to 112(r) above the threshold quantities.
<b>Regulation 61-62.70:</b> Title V	X		The facility's PTE is greater than 250TPY of criteria pollutants. The facility is taking a facility-wide federally enforceable limit of <10TPY of any single HAP and < 25TPY of total HAP to avoid being major source for HAP. The facility is subject to the Title V regulations solely due to criteria pollutants.
<b>Regulation 61-62.72:</b> Acid Rain		X	The facility is not a utility unit.
<b>Regulation 61-62.96:</b> Nitrogen Oxides (NO <sub>x</sub> ) Budget Trading Program		X	The facility does not participate in NO <sub>x</sub> emissions trading.
<b>Regulation 61-62.99:</b> Nitrogen Oxides (NO <sub>x</sub> ) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	This requirement applies to Kiln only.
<b>Federal Regulations (PROJECT ONLY)</b>			
NSPS (Part 60) Subpart(s)		X	This facility does not have sources subject to any NSPS standards. Boilers #1, #2 and #3 were installed prior to the applicability date of Subpart Dc. The package boiler #4 (Unit ID 2) was installed at Cone Mills in 1991. However, this boiler was moved from another plant were it had been constructed in 1979. Therefore, it would also not be subject to Subpart Dc. Also all of the VOC tanks were installed prior to the applicability date of Subpart Kb.
NESHAP (Part 61) Subpart(s)		X	This process does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
MACT (Part 63) Subpart(s)	X		Facility is a major source of HAP. However, this facility has taken federally enforceable limits to be synthetic minor source (less than 10 TPY of a single HAP and less than 25 TPY of total HAP). Unit I.Ds. 07, 08, 09 and 11 are subject to Subparts OOOO as the facility had not taken limits as of the compliance date; May 29, 2006. Therefore it is subject to this standard. The facility plan to demonstrate compliance with this regulation by using the complaint material option or other options listed in the MACT.
Area Source Standards (Part 63) Subpart(s)		X	The facility is a major source of HAP and already subject to Subparts OOOO.



**STATEMENT OF BASIS**

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<b>Company Name:</b>	Carlisle Finishing, LLC	<b>Permit Writer:</b>	David D. Abusah
<b>Permit Number:</b>	TV-2180-0003	<b>Date:</b>	DRAFT

**PROJECT REGULATORY APPLICABILITY REVIEW**

Regulation	Applicable		Comments
	Yes	No	
Compliance Assurance Monitoring (CAM) (Part 64)	X		The pre-controlled PTE for Unit I.D. 01 exceeds Title V threshold limits (PTE>10/25 TPY HAPs or >250 TPY criteria pollutants). CAM has been applied so that the multi-clone and the scrubber are monitored to ensure compliance with CAM requirements.

**SUMMARY AND CONCLUSIONS**

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

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