



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:	Kawashima Textile USA Inc.	Permit Writer:	Jeremy Lawson
Permit Number:	CM-1380-0048	Date:	October 8, 2009

DATE APPLICATION RECEIVED: March 31, 2009
DATE OF LAST INSPECTION: March 4, 2009; During this inspection no violations were reported and everything was in working order.

FACILITY DESCRIPTION Kawashima is a textile finishing plant. This facility is collocated with Shawmut Corporation, 1380-0073, for modeling purposes.

PROJECT DESCRIPTION This is a conditional major operating permit renewal.

CHANGES SINCE LAST OP ISSUANCE The changes that have occurred since the last operating permit was issued include removal of ID 07, a preset oven, and construction issued under permit 1380-0048-CH, which included a tenter frame and embossing press. The facility has requested a facility wide emissions limit to be placed on this operating permit even though their potential to emit does not call for one.

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
ID	Equipment ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
12	12	PM/PM ₁₀	5.25	23.0	Engineers Calculation
13	13	PM/PM ₁₀	0.8	3.5	Engineers Calculation
14	14	PM/PM ₁₀	0.04	0.18	AP-42 Table 1.4 - 1&2
14	14	SO ₂	0.009	0.039	AP-42 Table 1.4 - 1&2
14	14	NO _x	0.791	3.46	AP-42 Table 1.4 - 1&2
14	14	CO	0.414	1.81	AP-42 Table 1.4 - 1&2
14	14	VOC _(fuel)	2.81	12.3	AP-42 Table 1.4 - 1&2
14	14	Ethylene Glycol	0.7	3.1	Engineers Calculations
14	14	Formaldehyde	0.007	0.031	Engineers Calculations
14	14	Glycol Ethers	0.7	3.1	Engineers Calculations
14	14	Methanol	0.7	3.1	Engineers Calculations
14	14	Toluene	0.7	3.1	Engineers Calculations
14	14	Xylene	0.7	3.1	Engineers Calculations
19	01	PM/PM ₁₀	1.12	4.91	Manufacturers Data
19	01	SO ₂	5.39	23.6	Manufacturers Data
19	01	NO _x	7.01	30.7	Manufacturers Data
19	01	CO	1.57	6.88	Manufacturers Data
19	01	VOC _(fuel)	0.366	1.6	Manufacturers Data
19	02	PM/PM ₁₀	1.12	4.91	Manufacturers Data
19	02	SO ₂	5.39	23.6	Manufacturers Data
19	02	NO _x	7.01	30.7	Manufacturers Data
19	02	CO	1.57	6.88	Manufacturers Data
19	02	VOC _(fuel)	0.366	1.6	Manufacturers Data
19	03	PM/PM ₁₀	1.12	4.91	Manufacturers Data
19	03	SO ₂	5.39	23.6	Manufacturers Data
19	03	NO _x	7.01	30.7	Manufacturers Data
19	03	CO	1.57	6.88	Manufacturers Data
19	03	VOC _(fuel)	0.366	1.6	Manufacturers Data
19	04	PM/PM ₁₀	1.12	4.91	Manufacturers Data
19	04	SO ₂	5.39	23.6	Manufacturers Data



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UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)

ID	Equipment ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
19	04	NO _x	7.01	30.7	Manufacturers Data
19	04	CO	1.57	6.88	Manufacturers Data
19	04	VOC _(fuel)	0.366	1.6	Manufacturers Data
19	05	PM/PM ₁₀	0.006	0.026	AP-42 Table 1.4 - 1&2
19	05	SO ₂	0.001	0.00438	AP-42 Table 1.4 - 1&2
19	05	NO _x	0.122	0.534	AP-42 Table 1.4 - 1&2
19	05	CO	0.064	0.280	AP-42 Table 1.4 - 1&2
19	05	VOC _(fuel)	2.81	12.31	Engineers Calculations
19	06	PM/PM ₁₀	0.006	0.026	AP-42 Table 1.4 - 1&2
19	06	SO ₂	0.001	0.00438	AP-42 Table 1.4 - 1&2
19	06	NO _x	0.122	0.534	AP-42 Table 1.4 - 1&2
19	06	CO	0.064	0.280	AP-42 Table 1.4 - 1&2
19	06	VOC _(fuel)	2.81	12.31	Engineers Calculations
20	07	PM/PM ₁₀	0.012	0.053	AP-42 Table 1.4 - 1&2
20	07	SO ₂	0.003	0.013	AP-42 Table 1.4 - 1&2
20	07	NO _x	0.250	1.10	AP-42 Table 1.4 - 1&2
20	07	CO	0.131	0.574	AP-42 Table 1.4 - 1&2
20	07	VOC _(fuel)	0.03	0.12	AP-42 Table 1.4 - 1&2
20	07	VOC _(process)	2.81	12.31	Engineers Calculations
20	07	Ethylene Glycol	0.7	3.1	Engineers Calculations
20	07	Formaldehyde	0.007	0.031	Engineers Calculations
20	07	Glycol Ethers	0.7	3.1	Engineers Calculations
20	07	Methanol	0.7	3.1	Engineers Calculations
20	07	Toluene	0.7	3.1	Engineers Calculations
20	07	Xylene	0.7	3.1	Engineers Calculations
20	08	PM/PM ₁₀	0.012	0.053	AP-42 Table 1.4 - 1&2
20	08	SO ₂	0.003	0.013	AP-42 Table 1.4 - 1&2
20	08	NO _x	0.250	1.10	AP-42 Table 1.4 - 1&2
20	08	CO	0.131	0.574	AP-42 Table 1.4 - 1&2
20	08	VOC _(fuel)	0.03	0.12	AP-42 Table 1.4 - 1&2
20	08	VOC _(process)	2.81	12.31	Engineers Calculations
20	08	Ethylene Glycol	0.7	3.1	Engineers Calculations
20	08	Formaldehyde	0.007	0.031	Engineers Calculations
20	08	Glycol Ethers	0.7	3.1	Engineers Calculations
20	08	Methanol	0.7	3.1	Engineers Calculations
20	08	Toluene	0.7	3.1	Engineers Calculations
20	08	Xylene	0.7	3.1	Engineers Calculations
20	09	PM/PM ₁₀	0.2	0.876	AP-42 & Process Knowledge
20	09	SO ₂	0.0047	0.0206	AP-42 Table 1.4 - 1&2
20	09	CO	0.6586	2.885	AP-42 Table 1.4 - 1&2
20	09	NO _x	1.218	5.33	AP-42 Table 1.4 - 1&2
20	09	VOC _(fuel)	1.0	4.38	Based on Raw Material Usage
20	10	PM/PM ₁₀	0.2	0.876	AP-42 & Process Knowledge
20	10	SO ₂	0.0047	0.0206	AP-42 Table 1.4 - 1&2
20	10	CO	0.6586	2.885	AP-42 Table 1.4 - 1&2
20	10	NO _x	1.218	5.33	AP-42 Table 1.4 - 1&2
20	10	VOC _(fuel)	1.0	4.38	Based on Raw Material Usage
21	15	VOC _(process)	0.2	0.876	Process Knowledge
21	16	VOC _(process)	0.4	1.752	Process Knowledge



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CONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)					
ID	Equipment ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
12	12	PM/PM ₁₀	0.05	0.22	Engineers Calculation, 99% Efficiency
13	13	PM/PM ₁₀	0.01	0.0438	Engineers Calculation, 99% Efficiency

FACILITY WIDE EMISSIONS				
Pollutant	Uncontrolled Emissions		Controlled Emissions	
	TPY		TPY	
PM/PM ₁₀	48.21		21.97	
SO ₂	94.55		N/A	
NO _x	140.21		N/A	
CO	36.80		N/A	
VOC	79.58		N/A	
Ethylene Glycol (HAP,TAP,VOC)	9.20		N/A	
Formaldehyde (HAP,TAP,VOC, 112(r)Tox)	0.92		N/A	
Glycol Ethers (HAP,TAP,VOC)	9.20		N/A	
Methanol (HAP,TAP,VOC)	9.20		N/A	
Toluene (HAP,TAP,VOC)	9.20		N/A	
Xylene (HAP,TAP,VOC)	9.20		N/A	

* The ESP is a voluntary control device. The device is in place because it is an integral part of their process.

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		X	This is a renewal of the facility's Conditional Major Operating permit.
Section II(G): Conditional Major	X		The facility already is a Conditional Major and holds a Conditional Major permit. The facility has taken limits to bring their potential emissions of NO _x below 100 TPY and 10TPY/25YPY for single HAP/Total HAP.
Standard 1: Fuel Burning Operations	X		ID01-04 and ID09-10 have PM, SO ₂ , and Opacity limits imposed by this standard which are listed in Table 1 below.
Standard 2: Ambient Air Quality Standards	X		This facility has demonstrated compliance through modeling; see modeling summary dated 11/19/08. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 3: Waste Combustion/Reduction (state only)	X		This process contains waste combustion or reduction sources (Use/spec. oil).
Standard 3.1: HMI Waste Incinerators		X	No medical waste incineration.
Standard 4: Emissions from Process Industries	X		The emission sources listed in Table 2 have opacity limits (including any fugitives) and Particulate Matter (PM) allowable emissions rates (based on a process weight rate in tons per hour) imposed by this standard.
Standard 5: Volatile Organic Compounds		X	The facility-wide PTE of VOCs is too low to be subject to this regulation. (PTE = 550 lbs/any one day or greater than 150 lbs/any one hour – does not to apply to Part N.)



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PROJECT REGULATORY APPLICABILITY REVIEW			
Regulation	Applicable		Comments
	Yes	No	
Standard 5.1: BACT/LAER For VOC (state only)		X	The facility's baseline VOC emissions, current actual VOC emissions, and current PTE of VOC emissions in Table 3. Based on this table, the facility is not subject to LAER at this time.
Standard 5.2: Control of Oxides of Nitrogen		X	ID01-04 are above the exemption regulations limit of 10×10^6 BTU/hr limit but were constructed before the effective date of June 25, 2004 therefore are not subject to this regulation. All other sources are below the 10×10^6 BTU/hr limit therefore are exempt from this regulation.
Standard 7: Prevention of Significant Deterioration		X	The facility's PTE for any pollutant is not greater than 250 TPY.
Standard 7(c): Ambient Air Increments		X	There are no baselines established for PM ₁₀ , SO ₂ , or NO _x for Kershaw County.
Standard 7.1: Standards for Non Attainment Areas		X	This facility is not in a Non Attainment Area.
Standard 8: Toxic Air Pollutants (state only)	X		This facility has demonstrated compliance through modeling for all TAPs; see modeling summary dated 11/19/08.
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		The emission sources listed in Table 5 are subject to NSPS Standards. It is not subject to Subpart QQ because the print machine does not utilize a rotogravure.
Regulation 61-62.61: NESHAP		X	This facility does not emit any pollutants subject to this standard.
Regulation 61-62.63: NESHAP For Source Categories		X	This facility is major for HAP's. As such, the emission sources listed in Table 4 have taken federally enforceable emissions limitations to be a Conditional Major facility.
Regulation 61-62.68: Chemical Accident Prevention		X	This facility does not have more than a threshold quantity of a regulated substance under this subpart in a process.
Regulation 61-62.70: Title V		X	This facility is major for NO _x and HAP's. As such, the emission sources listed in Table 4 have taken federally enforceable emissions limitations to be a Conditional Major facility.
Regulation 61-62.72: Acid Rain		X	This facility does not meet applicability requirements under this regulation.
Regulation 61-62.96: Nitrogen Oxides (NO _x) Budget Trading Program		X	This facility is not in the NO _x or SO ₂ budget trading program.
Regulation 61-62.99: Nitrogen Oxides (NO _x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	This facility does not have any NO _x emissions from cement manufacturing.
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)	X		The emission sources listed in Table 5 are subject to NSPS Standards.
NESHAP (Part 61) Subpart(s)		X	This operation 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	This facility is major for HAP's. As such, the emission sources listed in Table 4 have taken federally enforceable emissions limitations to be a Conditional Major facility.
Area Source Standards (Part 63) Subpart(s)		X	This facility does not meet any of the area source requirements.



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
Compliance Assurance Monitoring (CAM) (Part 64)		X	This is not a Title V facility.

Table 1

ID	Equipment ID	Opacity	PM Allowable (0.6 lb/10 ⁶ BTU) lb/hr	SO ₂ Allowable (3.5 lb/10 ⁶ BTU) lb/hr	Uncontrolled Emissions (lb/hr)		Controlled Emissions (lb/hr)		Periodic Monitoring
					PM	SO ₂	PM	SO ₂	
ID19	01-04	20%, each	6.1, each	35.72, each	1.12, each	5.39, each	N/A	N/A	See Conditions
ID19	05-06	20%, each	5.04, each	29.4, each	0.006, each	0.001, each	N/A	N/A	See Conditions

Table 2

ID	Equipment ID	Opacity (%)	PM Allowable (lb/hr)	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Controlled PM Emissions (lb/hr)	Periodic Monitoring
12	12	20	1.67 lb/hr	0.263	5.25	0.05	Lint Collection System
13	13	20	2.22 lb/hr	0.39	0.8	0.01	N/A
14	14	20	3.53 lb/hr	0.8	0.04	N/A	N/A
20	07	20	N/A	N/A	0.012	N/A	N/A
20	08	20	N/A	N/A	0.012	N/A	N/A
20	09	20	11.23 lb/hr	4.5	0.2	N/A	N/A
20	10	20	11.23 lb/hr	4.5	0.2	N/A	N/A
21	15	20	3.53 lb/hr	0.8	0.0	N/A	N/A
21	16	20	3.53 lb/hr	0.8	0.0	N/A	N/A

Table 3

OP ID	Equipment ID	LAER Baseline (TPY)	Actual VOC Emissions (TPY)*	Potential VOC Emissions (TPY)
Facility Wide	All	0	25.20	79.34

*Actual VOC Emissions based on year from July 2008 through June 2009

Table 4

OP ID	Equipment ID	CP Issue Date	Public Notice Date	Emission Limitation (TPY)	Compliance Method
Facility Wide	ALL	N/A	N/A	HAP's < 10/25 NO _x < 100	12- Month Reporting

Table 5

OP ID	Equipment ID	Affected Source(s)	Equipment ID	NSPS Standard
ID19	01-04	N/A	Boilers	A & Dc

*Boilers 05 and 06 are not subject because they are less than 10 X 10⁶ BTU/hr.

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.