

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Mooresville Regional Office
County: Alexander
NC Facility ID: 0200089
Inspector's Name: Melinda Wolanin
Date of Last Inspection: 08/08/2017
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Royale Comfort Seating, Inc. - Plant No. 1</p> <p>Facility Address: Royale Comfort Seating, Inc. - Plant No. 1 141 Alspaugh Dam Road Taylorsville, NC 28681</p> <p>SIC: 3086 / Plastics Foam Products NAICS: 32614 / Polystyrene Foam Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Fee Classification: Before: Title V After:</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 02D .0515, 02D .0521, 02D .0535, 02D .0540, 02D .1806, 02Q .0207, 02Q .0504(d), 02Q .0507 NSPS: NESHAP: PSD: PSD Avoidance: 02Q .0317 NC Toxics: 112(r): Other:</p>
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Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Lee Isenhour HR and Safety (828) 632-2865 PO Box 235 Taylorsville, NC 28681	Clyde Goble President (828) 632-2865 PO Box 235 Taylorsville, NC 28681	Lee Isenhour HR and Safety (828) 632-2865 PO Box 235 Taylorsville, NC 28681	<p>Application Number: 0200089.18A Date Received: 03/12/2018 Application Type: Modification Application Schedule: TV-1st Time Existing Permit Data Existing Permit Number: 08939/R03 Existing Permit Issue Date: 04/20/2017 Existing Permit Expiration Date: 03/31/2025</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	---	---	15.20	---	---	14.00	14.00 [TCE (trichloroethylene)]
2016	---	---	13.80	---	---	13.80	13.10 [TCE (trichloroethylene)]
2015	---	---	19.64	---	---	19.44	17.96 [TCE (trichloroethylene)]
2013	---	---	22.14	---	---	10.53	10.51 [TCE (trichloroethylene)]

<p>Review Engineer: Urva Patel</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08939/T04 Permit Issue Date: Permit Expiration Date:</p>
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1. Purpose of Application:

Currently, Royale Comfort Seating, Inc. – Plant No. 1 holds Air Quality Permit No. 08939R03 for the construction and operation of the facility with an expiration date of March 31, 2025. The primary purpose of this permit application is a First-time Title V permit without modification. The First-time Title V application (**Application No. 0200089.18A**) was received on March 12, 2018 per Air Quality Permit No. 08939R03, Condition No. 2.1 A.11. All terms and conditions of the existing permit shall remain in effect until the First-time Title V permit has been issued or denied.

2. Facility Description:

Royale Comfort Seating, Inc. is a manufacturer of cushions for upholstery furniture including glue spraying operation. Foam cutting and glue operation, no flame laminate or loop splitter. This facility is located in Taylorsville, Alexander County, North Carolina.

3. History / Background / Application Chronology:

Permit History

September 22, 2000	Air Quality Permit No. 08939R00 issued with an expiration date of August 31, 2005. It includes construction and operation of ID No. 2 (One (1) foam fabrication operation (ID No. 2, 7.06 pounds per hour process rate) consisting of a glue spraying operation).
June 25, 2005	Air Quality Permit No. 08939R01 issued with an expiration date of June 30, 2010 for renewal of the air permit.
April 30, 2010	Air Quality Permit No. 08939R02 issued with an expiration date of March 31, 2015 for renewal of the air permit.
April 20, 2017	Air Quality Permit No. 08939R03 issued with an expiration date of March 31, 2025. It includes removal of Title V avoidance condition and reclassification as Title V.

Application Chronology

March 12, 2018	Received application for modification of the permit- 1 st time TV.
March 13, 2018	Sent acknowledgement letter indicating that the application for permit modification was complete.

4. Summary of Changes to the Existing Permit (Permit No. 08939R03):

Page No.	Section	Description of Changes
Cover Letter	N/A	<ul style="list-style-type: none">Update cover letter with application number, permit numbers, dates, fee class, PSD increment statement, and Director name.
Permit Cover	N/A	<ul style="list-style-type: none">Insert new issuance and complete application date, application number, facility information.
	Section 2 and Section 3	<ul style="list-style-type: none">Updating regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistent with regulation nomenclature.
4	2.1 A.3	<ul style="list-style-type: none">Removal of permit condition and renumbered the remaining conditions accordingly.
5,6	2.1 A.6 2.1 A.7 2.1 A.8 2.1 A.9	<ul style="list-style-type: none">Removal of permit condition as per filing of First-time Title V permit application and renumbered the remaining conditions accordingly.
	Section 3	<ul style="list-style-type: none">Section was revised from v.5.1 to current shell version 5.2 (04/03/2018).References to DENR were revised to DEQ

5. Compliance Status:

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on August 8, 2017, Melinda Wolanin of the Mooresville Regional Office indicated that the facility appeared to be in compliance with all the applicable requirements. Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was submitted with Application No. 0200089.18A on March 12, 2018.

Five-year Compliance History:

- On November 21, 2014, the Mooresville Regional Office of Air Quality (DAQ) sent facility a letter serving as a Notice of Violation for violation of 15A North Carolina Administration Code (NCAC) 02Q .0803, for operations exceeding Title V threshold levels in violation of Air Permit No. 08939R02 Specific Condition and Limitation No. A.9. This issue was resolved on June 26, 2015 with a final action.
- On March 17, 2016, the Mooresville Regional Office of Air Quality (DAQ) sent facility a letter serving as a Notice of Deficiency for failure to submit the required reports within the required timeframe in violation of Air Permit No. 08939R02, Specific Condition and Limitation No. A.9.b.i.
- The facility was inspected on August 02, 2016 and appeared to be in compliance with all applicable air quality regulations.
- On March 6, 2017, the Mooresville Regional Office of Air Quality (DAQ) sent facility a letter serving as a Notice of Violation for violation of 15A North Carolina Administration Code (NCAC) 02Q .0803, for operations exceeding Title V threshold levels in violation of Air Permit No. 08939R02 Specific Condition and Limitation No. A.9 (for late reporting of VOCs and total HAPs). This issue was resolved on March 28, 2017 with a final action.

6. New/Modified Equipment/Changes in Emissions:

This is a First-time Title V permit. There is NO modification to the equipment list in this permitting action.

7. Regulatory Review

Unless specifically noted, a detailed discussion of the following list of equipment and all associated permit conditions is not included as applicability status has not changed. See permit review R03 dated April 20, 2017. The permit conditions have been modified to reflect the most current language, as necessary. The facility is expected to be in continued compliance.

A. Foam fabrication process consisting of glue spraying operation (ID No. ES-2)

1. Applicable Regulatory Requirements:

- 15A NCAC 02D .0515: Particulate from Miscellaneous Industrial Processes
- 15A NCAC 02D .0521: Control of Visible Emissions
- 15A NCAC 02D .1806: Control and Prohibition of Odorous Emissions (State-enforceable only)
- 15A NCAC 02Q .0317: Avoidance Condition (PSD Avoidance)

2. Changes in this permit

- Removal of 15A NCAC 02D .0535, Notification Requirement, 15A NCAC 02D .0540: Particulates from Fugitive Dust Emission Sources, and 15A NCAC 02Q .0207: Annual Emission Inventory Requirement as it's a first-time TV permit application. (*These appear in the General Conditions of a Title V permit rather than specific conditions*)
- Removal of 15A NCAC 02Q .0504(d), Option for Obtaining Construction and Operation Permit and 15A NCAC 02Q .0507, (Title V) Application as it's a first-time TV permit application.

8. NSPS, NESHAP/MACT, NSR/PSD, 112(r), CAM

NSPS

This facility is NOT subject to New Source Performance Standards (NSPS), 40 CFR 60. This permit modification does not change this status.

NESHAP/MACT

This facility is a major source for HAPs emissions and is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63. Therefore, it is no longer subject to GACT OOOOOO (National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources).

The facility is not subject to 40 CFR Part 63 Subpart III (NESHAP for Flexible Polyurethane Foam Production) because the facility is not engaged in foam production. The facility is considered a flexible polyurethane foam fabrication facility as defined in §63.11419.

The facility is not subject to 40 CFR Part 63 Subpart M (NESHAP for Flexible Polyurethane Foam Fabrication Operations) because they do not operate a flame lamination source or a loop splitter affected source.

NSR/PSD

Alexander County is currently designated as attainment for all PSD regulated pollutants. Alexander County is triggered for SO₂ with respect to minor source baseline date. However, this new permit does not affect these triggered pollutants.

This facility is a “250 ton” industrial category source and currently a “minor” source for PSD. The facility has taken limitation to avoid PSD by limiting the VOC potential to emit to less than 250 tons/yr.

- 15A NCAC 02Q .0317, Avoidance Conditions – The facility has accepted the following conditions to avoid applicability of 2D .0530, Prevention of Significant Deterioration (PSD):

Emission Source(s)	PSD Avoidance Condition for VOC
Foam fabrication process consisting of glue spraying operation (ID No. ES-2)	< 250 tons per year of VOC emissions

The permit includes requirements to calculate VOC emissions based on material usage and submit semi-annual reports of calculations (monthly and yearly).

112(r)

This facility is NOT subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above applicability thresholds.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, the provisions of the Compliance Assurance Monitoring (CAM) rule are applicable to emission units that meet all of the following criteria:

- Criteria #1: The unit is subject to an emission limitation AND uses a control device to achieve compliance with the limit;
- Criteria #2: The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source (i.e., 100 tpy of any criteria pollutant or 10 tpy of any HAP); and,
- Criteria #3: The unit is not exempt under 40 CFR 64.2(b).

The following table summarizes CAM applicability at Automated Solutions, LLC:

Emission Unit	Criteria #1: Does the Source Use a Control Device?	Criteria #2: Pre-control PTE ≥100% of major source thresholds?	Criteria #3: Exempt Under 40 CFR 64.2(b)?	CAM Source?
ES-2	No	No (VOC)	VOC: No	No

Therefore, the facility is NOT subject to CAM.

9. Facility-Wide Air Toxics:

The facility is NOT subject to the requirements of air toxics permitting. This application did not trigger an air toxics review as there were no physical changes or changes in the methods of operations/processes. No unacceptable risk to human health is suggested. No further air toxics evaluation is required at this time.

10. Facility Emission Review:

Based on the potential emissions shown below, this facility is classified as a Title V facility. VOC emissions are referenced from the permit application. This First-time Title V permit does not affect this status.

Pollutant	Expected Actual Emissions	Potential Emissions
VOCs	19.9 lb/hr	87.16 tons/year
Trichloroethylene	17 lb/hr	17 tons/year = 34277.9 lb/year
Total HAPs	17 lb/hr	17 tons/year = 34277.9 lb/year

Expected Operating Schedule: 8 hr/day; 5 day/week; 50 week/year

11. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia is an affected state; Forsyth County and Mecklenburg County are affected local programs within 50 miles of the facility.

12. Other Regulatory Considerations:

- A Permit Application fee was received for Permit Application No. 0200089.18A and was included as part of the permit application.
- A P.E. Seal is NOT required for this permit application.
- A 30-day public notice and 45-day EPA review is required for this application.

13. Recommendations/Conclusion:

TBD