

STATEMENT OF BASIS

for the issuance of Draft Air Permit # 235-AR-2

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

2. APPLICANT:

Yanoor Corporation D.B.A Burlington Rugs - Plant 2
1093 U.S. Highway 278E
Monticello, Arkansas 71655

3. PERMIT WRITER: Kimberly Lindsey

4. PROCESS DESCRIPTION AND SIC CODE:

SIC Description: Carpet and Rug Mills
SIC Code: 2273

5. SUBMITTALS: November 6, 2002

6. REVIEWER'S NOTES:

Yanoor Corporation, doing business as Burlington Rugs, operates two rug/carpet manufacturing facilities in Monticello, AR. This permit addresses operations at Plant 2 (Burlington Rugs – Plant 2), whose primary operations include dyeing and tufting of the rugs. This modification to the existing permit addresses process and equipment changes at the facility including the addition of dye becks (SN-03) and a 3-zone natural gas fired dryer (SN-02) and the removal of #6 fuel oil at the Cleaver Brooks Boiler (SN-01). The dye becks and the dryer are existing equipment; however they have been shut down since 1985. Granulated Ammonia Sulfate is added to the dye to act as a catalyst. It is assumed that 100% of the ammonia sulfate is emitted as ammonia.

Additionally, the facility wishes to revise emission rates that have since changed due to emission factor revisions. This modification will result in an emission decrease in PM/PM₁₀, SO₂,NO_x and SO₃ by 1.8 tpy, 59.9 tpy, 17.8 and 0.8 tpy, respectively. CO emissions will increase by 20.7 tpy and ammonia emissions will increase by 94.2 tpy. Total emissions from Plant 1 and Plant 2 are less than Title V threshold limits.

7. COMPLIANCE STATUS:

Permit #: 0237-AR-2

CSN #: 22-0002

Page 2 of 5

The following summarizes the current compliance status of the facility including active/pending enforcement actions and recent compliance activities and issues.

There are no active/pending enforcement actions for this facility at this time.

8. APPLICABLE REGULATIONS:

PSD Applicability

Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, et cetera?)	Y/N	N
Has this facility undergone PSD review in the past?	Y/N	N
Is this facility categorized as a major source for PSD? \$ 100 tpy and on the list of 28 (100 tpy)?	Y/N	N
\$ 250 tpy all other	Y/N	N

PSD Netting

Was netting performed to avoid PSD review in this permit? Y/N N

If so, indicate increases and decreases used in netting for PSD purposes only.

Source and Pollutant Specific Regulatory Applicability

Source	Pollutant	Regulation [NSPS, NESHAP (Part 61 & Part 63), or PSD only]
NONE		

9. EMISSION CHANGES:

The following table summarizes plant wide emission changes associated with this permitting action.

Plant Wide Permitted Emissions (ton/yr)			
Pollutant	Air Permit #235-AR-1	Air Permit #235-AR-2	Change
PM/PM ₁₀	5.4	3.6	-1.8
SO ₂	60.9	1.0	-59.9
VOC	2.3	2.3	0
CO	12.7	33.4	20.7
NO _x	57.2	39.4	-17.8
SO ₃	0.8	0	-0.8
Ammonia	0	94.2	94.2

10. MODELING:

Criteria Pollutants

Examination of the source type, location, plot plan, land use, emission parameters, and other available information indicate that modeling is not warranted at this time.

11. Non-Criteria Pollutants

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department deemed PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11*TLV	Proposed lb/hr	Pass?
Ammonia	17.41	1.92	21.5	No

2nd Tier Screening (PAIL)

ISCST3 air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound was deemed by the Department to be one one-hundredth of the Threshold Limit Value, as listed by the ACGIH.

Pollutant	(PAIL, $\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Ammonia	174.1	113.06	Yes

12. CALCULATIONS:

Permit #: 0237-AR-2

CSN #: 22-0002

Page 4 of 5

SN	Emission Factor Source (AP-42, Testing, etc)	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type (if any)	Control Equipment Efficiency	Comments (Emission factor controlled/uncontrolled, etc)
01	AP-42	NOx: 100 lb/10 ⁶ scf CO: 84 lb/10 ⁶ scf SO ₂ : 0.6 lb/10 ⁶ scf PM/PM ₁₀ : 7.6 lb/10 ⁶ scf VOC 5.5 lb/10 ⁶ scf			AP-42 Section 1.4; uncontrolled emission factor
02	AP-42	NOx: 100 lb/10 ⁶ scf CO: 84 lb/10 ⁶ scf SO ₂ : 0.6 lb/10 ⁶ scf PM/PM ₁₀ : 7.6 lb/10 ⁶ scf VOC 5.5 lb/10 ⁶ scf			AP-42 Section 1.4; uncontrolled emission factor
03	Material Balance	50 lb ammonia sulfate/cycle			It is assumed that 100% of ammonia sulfate is emitted as ammonia

13. TESTING REQUIREMENTS:

There are no stack testing requirement for this facility.

14. MONITORING OR CEMS

The permit requires no parameter monitoring or CEMS.

15. RECORD KEEPING REQUIREMENTS

The following are items (such as throughput, fuel usage, VOC content of coating, etc) that must be tracked and recorded, frequency of recording and whether records are needed to be included in any annual, semiannual or other reports.

SN	Recorded Item	Limit (as established in permit)	Frequency*	Report (Y/N)**
02	Natural gas usage	783 million scf/year	Monthly	Y

* Indicate frequency of recording required for the item (Continuously, hourly, daily, etc)
 ** Indicates whether the item needs to be included in reports

Permit #: 0237-AR-2

CSN #: 22-0002

Page 5 of 5

16. OPACITY

SN	Opacity %	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism (daily observation, weekly, control equipment operation, etc)
01	10	Previous Permitted Limit	Observation
02	10	Previous Permitted Limit	Observation

17. DELETED CONDITIONS:

The previous permit contained the following deleted Specific Conditions.

Former SC	Justification for removal
07	Fuel Oil will no longer be used for SN-01

18. VOIDED, SUPERSEDED OR SUBSUMED PERMITS

List all active permits voided/superseded/subsumed by issuance of this permit for this facility.

Permit #
0235-AR-1

19. CONCURRENCE BY:

The following supervisor concurs with the permitting decision:

Lyndon Poole, P.E.