# ADEQ MINOR SOURCE AIR PERMIT

Permit No.: 235-AR-2

IS ISSUED TO:

Yanoor Corporation D.B.A. Burlington Rugs - Plant 2 1093 U.S. Highway 278E Monticello, AR 71655 Drew County AFIN: 22-00057

THIS PERMIT IS THE ABOVE REFERENCED PERMITTEE'S AUTHORITY TO CONSTRUCT, MODIFY, OPERATE, AND/OR MAINTAIN THE EQUIPMENT AND/OR FACILITY IN THE MANNER AS SET FORTH IN THE DEPARTMENT'S MINOR SOURCE AIR PERMIT AND THE APPLICATION. THIS PERMIT IS ISSUED PURSUANT TO THE PROVISIONS OF THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT (ARK. CODE ANN. SEC. 8-4-101 *ET SEQ*.) AND THE REGULATIONS PROMULGATED THEREUNDER, AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds Chief, Air Division Date Amended

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A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
СО	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SO2	Sulfur Dioxide
Тру	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

# Section I: FACILITY INFORMATION

PERMITTEE:	Yanoor Corporation D.B.A. Burlington Rugs - Plant 2
AFIN:	22-00057
PERMIT NUMBER:	235-AR-2
FACILITY ADDRESS:	1093 U.S. Highway 278E Monticello, AR 71655
MAILING ADDRESS:	1093 U. S. Highway 278E Monticello, Arkansas 71655
COUNTY:	Drew
COUNTY: CONTACT POSITION:	Drew J.W. Smith, Environmental Manager
CONTACT POSITION:	J.W. Smith, Environmental Manager (870) 367-6270
CONTACT POSITION: TELEPHONE NUMBER:	J.W. Smith, Environmental Manager (870) 367-6270

# Section II: INTRODUCTION

#### Summary of Permit Activity

Yanoor Corporation, doing business as Burlington Rugs, operates two rug/carpet manufacturing facilities in Monticello, Arkansas. This permit addresses operations at Plant 2 (Burlington Rugs – Plant 2), who's primary operations include dyeing and tufting of the rugs. This modification to the existing permit addresses process and equipment changes to 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 emissions decrease in  $PM/PM_{10}$ ,  $SO_2$ ,  $NO_x$  and  $SO_3$  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.

#### **Process Description**

Yarn is tufted into rug backing on large, computer-operated looms. The backing is in 12-foot widths and varied lengths. The computer program controls is the pattern, size, shape, pile height, and other characteristics of the rugs. After the backing is tufted, it is sent to a separate Burlington Rugs facility for further processing.

Dying operation is also performed at Plant 2. Eight dye becks (SN-03) are located at the facility for rug and carpet dyeing. Five of the becks are vented to the atmosphere while the other three units are pressurized and therefore have no associated emissions. All carpet and rug drying is done at natural gas-fired, three zone drying unit (SN-02). Each of the three zones is equipped with two burners. The unit is rated at 16.8 MMBtu/hr.

One boiler is used to provide steam for the facility. The Cleaver-Brooks boiler (SN-01) was installed in 1969 and is rated at 70,000 lb/hr of steam (77.9 MMBtu/hr).

#### Regulations

The facility is subject to the following regulations: Regulation 18, Arkansas Air Pollution Control Code and Regulation 19, Regulations for the Arkansas Plan of Implementation for Air Pollution Control.

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

TOTAL ALLOWABLE EMISSIONS			
Pollutant	Emission Rates		
	lb/hr	tpy	
PM	0.8	3.6	
PM <sub>10</sub>	0.8	3.6	
SO <sub>2</sub>	0.2	1.0	
VOC	0.5	2.3	
СО	7.6	33.4	
NO <sub>x</sub>	9.0	39.4	
Ammonia	7.4	32.4	

# Total Allowable Emissions

#### Section III: PERMIT HISTORY

Air Permit #235-A, issued July 26, 1974, was the initial permit for this facility. This permit included all three sites operated by Burlington Industries, Inc.; Burlington House Area Rug I, Burlington House Area Rug II, and Burlington House Area Rug III.

Air Permit #235-AR-1 was issued June 29, 1993. Two other Burlington Industries facilities, BHAR I and BHAR II, performed operation related to BHAR II. Originally, all three sites were assigned the same county serial number (CSN), but separate numbers. This permit modification served to assign a distinct CSN to each site. Also, the facility proposed to modify the existing permit to limit the use of N0. 6 fuel oil in the boiler to periods of natural gas curtailment.

# Section IV: EMISSION UNIT INFORMATION

### Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 19, §19.501 et seq., effective December 19, 2004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Cleaver-Brooks Boiler	$PM_{10}$	0.6	2.7
		$SO_2$	0.1	0.5
		VOC	0.4	1.8
		СО	6.2	27.2
		NO <sub>x</sub>	7.4	32.4
02	Three-Zone Dryer	$PM_{10}$	0.2	0.9
		$SO_2$	0.1	0.5
		VOC	0.1	0.5
		СО	1.4	6.2
		NO <sub>x</sub>	1.6	7.0

2. The permittee shall not exceed the emission rates set forth in the following table. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Cleaver-Brooks Dryer	PM	0.6	2.7
02	Three-Zone Dryer	PM	0.2	0.9
03	Dye Becks	Ammonia	7.4	32.4

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

SN	Limit	Regulatory Citation
01	10%	§18.503
02	10%	§18.503

- 4. The permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation 18, §18.901 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 5. The permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation 18, §18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 6. The permittee shall not process more than 250,000 pounds of ammonia sulfate at the facility per consecutive 12-month period. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 7. The permittee shall maintain monthly records which demonstrate compliance with Specific Condition #6. The permittee will update the records by the fifteenth day of the month following the month to which the records pertain. The permittee will keep the records onsite, and make the records available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 8. The permittee shall only use pipeline quality natural gas to fire the boiler, ovens and dryers located at the facility. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 9. The permittee shall not use in excess of 783 million standard cubic feet of natural gas at the facility in any consecutive twelve months. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 10. The permittee shall maintain records of the amount of natural gas used at the facility in order to demonstrate compliance with Specific Condition #9 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. [Regulation 19, §19.705 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

# Section V: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and 19 Appendix A. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated November 6, 2002.

Description	Category
NONE	

# Section VI: GENERAL CONDITIONS

- 1. Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit that specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
- 2. This permit does not relieve the owner or operator of the equipment and/or the facility from compliance with all applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated under the Act. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 3. The permittee will notify the Department in writing within thirty (30) days after commencement of construction, completion of construction, first operation of equipment and/or facility, and first attainment of the equipment and/or facility target production rate. [Regulation 19, §19.704 and/or A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 4. Construction or modification must commence within eighteen (18) months from the date of permit issuance. [Regulation 19, §19.410(B) and/or Regulation 18, §18.309(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 5. The permittee must keep records for five years to enable the Department to determine compliance with the terms of this permit such as hours of operation, throughput, upset conditions, and continuous monitoring data. The Department may use the records, at the discretion of the Department, to determine compliance with the conditions of the permit. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 6. A responsible official must certify any reports required by any condition contained in this permit and submit any reports to the Department at the address below. [Regulation 19, §19.705 and/or Regulation 18, §18.1004 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Arkansas Department of Environmental Quality Air Division ATTN: Compliance Inspector Supervisor Post Office Box 8913

Little Rock, AR 72219

- 7. The permittee will test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) newly constructed or modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) existing equipment already operating according to the time frames set forth by the Department. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee must submit compliance test results to the Department within thirty (30) days after the completion of testing. [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 8. The permittee will provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. Sampling ports adequate for applicable test methods
  - b. Safe sampling platforms
  - c. Safe access to sampling platforms
  - d. Utilities for sampling and testing equipment
- 9. The permittee will operate equipment, control apparatus and emission monitoring equipment within their design limitations. The permittee will maintain in good condition at all times equipment, control apparatus and emission monitoring equipment. [Regulation 19, §19.303 and/or Regulation 18, §18.1104 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 10. If the permittee exceeds an emission limit established by this permit, the permittee will be deemed in violation of said permit and will be subject to enforcement action. The Department may forego enforcement action for emissions exceeding any limits established by this permit provided the following requirements are met: [Regulation 19, §19.601 and/or Regulation 18, §18.1101 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. The permittee demonstrates to the satisfaction of the Department that the emissions resulted from an equipment malfunction or upset and are not the result of negligence or improper maintenance, and the permittee took all reasonable measures to immediately minimize or eliminate the excess emissions.
  - b. The permittee reports the occurrence or upset or breakdown of equipment (by telephone, facsimile, or overnight delivery) to the Department by the end of the next business day after the occurrence or the discovery of the occurrence.
  - c. The permittee must submit to the Department, within five business days after the occurrence or the discovery of the occurrence, a full, written report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences,

including, but not limited to, action to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded, and to reduce the length of time for which said limits are exceeded. If the information is included in the initial report, the information need not be submitted again.

- 11. The permittee shall allow representatives of the Department upon the presentation of credentials: [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
  - a. To enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
  - b. To have access to and copy any records required to be kept under the terms and conditions of this permit, or the Act;
  - c. To inspect any monitoring equipment or monitoring method required in this permit;
  - d. To sample any emission of pollutants; and
  - e. To perform an operation and maintenance inspection of the permitted source.
- 12. The Department issued this permit in reliance upon the statements and presentations made in the permit application. The Department has no responsibility for the adequacy or proper functioning of the equipment or control apparatus. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 13. The Department may revoke or modify this permit when, in the judgment of the Department, such revocation or modification is necessary to comply with the applicable provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated the Arkansas Water and Air Pollution Control Act. [Regulation 19, §19.410(A) and/or Regulation 18, §18.309(A) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 14. This permit may be transferred. An applicant for a transfer must submit a written request for transfer of the permit on a form provided by the Department and submit the disclosure statement required by Arkansas Code Annotated '8 1 106 at least thirty (30) days in advance of the proposed transfer date. The permit will be automatically transferred to the new permittee unless the Department denies the request to transfer within thirty (30) days of the receipt of the disclosure statement. The Department may deny a transfer on the basis of the information revealed in the disclosure statement or other investigation or, deliberate falsification or omission of relevant information. [Regulation 19, §19.407(B) and/or Regulation 18, §18.307(B) and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 15. This permit shall be available for inspection on the premises where the control apparatus is located. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

- 16. This permit authorizes only those pollutant emitting activities addressed herein. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- This permit supersedes and voids all previously issued air permits for this facility.
  [Regulation 18 and 19 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
- 18. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 9. [A.C.A §8-1-105(c)]