

Application Review

Issue Date: Date needed

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900257
Inspector's Name: Andrew Kormos
Date of Last Inspection: 02/24/2023
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Halyard North Carolina, LLC</p> <p>Facility Address: Halyard North Carolina, LLC 389 Clyde Fitzgerald Road Linwood, NC 27299</p> <p>SIC: 2297 / Nonwoven Fabrics NAICS: 31323 / Nonwoven Fabric Mills</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0503, .0515, .0516, .0521, .0524, .1100, .1806 and 02Q .0711 NSPS: Dc, JJJJ NESHAP: ZZZZ PSD: N/A PSD Avoidance: N/A NC Toxics: arsenic, benzene, cadmium, chromium VI, di(2-ethylhexyl) phalate, methylene chloride and n-hexane 112(r): N/A Other: N/A</p>
--	--

Contact Data			Application Data				
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2900257.20A, 2900257.21A, 2900257.22A Date Received: 05/15/2020, 06/20/2021, 03/11/2022 Application Types: 502(b)(10), 502(b)(10), Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05635/T16 Existing Permit Issue Date: 06/08/2018 Existing Permit Expiration Date: 09/30/2022</p>				
Rick Wilson Environmental Coordinator (336) 693-9316 389 Clyde Fitzgerald Rd Linwood, NC 27299	James Borland Plant Manager (336) 248-7301 389 Clyde Fitzgerald Rd Linwood, NC 27299	Jordan Rummage Maintenance Manager (336) 309-4928 389 Clyde Fitzgerald Rd Linwood, NC 27299					

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	0.0700	11.79	72.26	9.91	7.23	3.14	2.00 [Hexane, n-]
2020	0.0700	11.46	80.09	9.63	7.06	3.04	1.90 [Hexane, n-]
2019	0.0600	11.36	68.68	9.54	6.36	2.97	1.92 [Hexane, n-]
2018	0.0700	11.05	100.88	9.93	6.46	2.33	1.36 [Hexane, n-]
2017	0.0800	12.85	94.40	11.95	5.68	2.62	1.62 [Hexane, n-]

<p>Review Engineer: Jacob Larson</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 05635/T17 Permit Issue Date: Date needed Permit Expiration Date: Date needed</p>
--	---

1. Purpose of Application

Halyard North Carolina, LLC currently holds Title V Permit No. 05635T16 with an expiration date of September 30, 2022 for nonwoven fabrics manufacturing facility in Linwood, Davidson County, North Carolina. This permit Application is for a permit renewal and two 502(b)(10) modifications. The renewal application was received March 11, 2022, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

The following equipment changes and modifications will be applied to this renewal.

The 502(b)(10) modifications under application 2900257.20A (05/15/2020):

An electric burnoff oven (I8) will be added to the laminator machine which will be used to burn off/clean glue tips and milt filters. Additionally, a two-bank Meltblown Machine (LX5) will be added to make material for medical facemasks. The machine will have a maximum capacity of 2,000 lbs/hr of Meltblown polypropylene polymer.

The addition of the electric burnoff oven and two-bank Meltblown Machine will result in an increase in actual and potential emissions from the facility. However, the emissions increase will not cause emissions allowed under the permit to be exceeded.

The "Off Permit Change" dated 12/18/2020, Halyard removed the 2.7 MMBtu/hr natural gas-fired sheet dryer heater ES-3-SD. Since the modification involves removal of an emission unit, no applicable emission standard or permit condition will be violated and facility emission will decrease as a result. On this basis, the modification is considered an off-permit change in accordance with 15A NCAC 02Q .0523(b).

The 502(b)(10) modifications for application 2900257.21A (07/26/2021):

The two natural gas-fired furnaces associated with the LX1 machine have incorrect maximum capacities listed in the previous renewal application. ES-1-NGF, previously permitted as a 3.1 MMBTU/hr natural gas fired furnace, has an actual rated capacity of 3.5 MMBTU/hr. ES-2-NGF, previously permitted as a 2.1 MMBTU/ hr natural gas-fired furnace, has an actual rated capacity of 2.4 MMBTU/hr. Additionally, the facility has installed a mist eliminator on the Web Treatment Machine (WT3) to increase draft on the fan.

The corrections for ES-1-NGF and ES-2-NGF will increase emissions slightly. However, actual emissions remain far below permit limits. The installation of the Mist Eliminator on I9 will result in no expected emission changes.

During the previous inspection conducted by Andrew Kormos 02/24/2023, the Natural Gas-fired Burnout oven (BO1) has a 0.85 MMBtu/hr maximum heat input capacity not 0.95 MMBtu/hr capacity as it is listed in the previous permit. It was also discovered that ES-4-PH has the incorrect heat input of 9 mmBtu/hr instead of correct 10 mmBtu/hr.

2. Facility Description

Halyard is located at 389 Clyde Fitzgerald Road, Linwood, NC 27299. The facility produces nonwoven roll goods by manufacturing fabrics from synthetic fibers. Halyard's personal care and

health care products include medical/surgical fabric products, including wraps gowns and face masks.

Halyard has the potential to emit criteria air pollutants in excess of 100 tons per year. Therefore, the facility is subject to the Title V major source program and must submit an application for an air permit to Construct/operate in accordance with the requirements of 40 CFR Part 70 and 15A NCAC 02Q .0500.

3. History/Background/Application Chronology

History/Background

June 08, 2018	TV permit renewal issued. Air Permit No. 05635T16 was issued with an expiration date of September 30, 2022
May 15, 2020	502(b)(10) Modification, addition of Electric Burnoff Oven (I9) and a Melt Blown Machine (LX5)
December 18, 2020	Off Permit change, removed natural gas fired sheet dryer (ES-3-SD) from facility
July 26, 2021	502(b)(10) Modification, correcting capacities of ES-1-NGF, ES-2-NGF and adding Web Treatment Machine WT3

Application Chronology

March 11, 2022	DEQ received permit application 2900257.22A for Title V renewal.
March 14, 2022	Sent acknowledgment letter indicating that the application for permit renewal was complete.
June 16, 2023	Draft permit and review forwarded for comments to Permitting Supervisor.
June 30, 2023	Comments received from Booker Pullen, Permitting Supervisor.
July 03, 2023	Draft permit and review forwarded to the Stationary Compliance Branch for comments. No comments were received July 07, 2023.
July 03, 2023	Draft permit and review forwarded to the Winston-Salem Regional Office for comments. Minor comments were received July 10, 2023.
July 03, 2023	Draft permit forwarded to the applicant for comments. No comments were received July 03, 2023.
July 12, 2023	Draft permit and permit review forwarded to public notice.
XXXX xx, 2023	Public comment period ends. ____ comments received.

XXXX xx, 2023 EPA comment period ends. ___ comments received.

XXXX xx, 2023 Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page No.	Section	Description of Changes
--	Cover page and throughout permit	Updated all tables, dates, and permit revision numbers.
Pg 3 of cover letter	Cover page	Added "Notice Regarding the Right To Contest A Division Of Air Quality Permit Decision" page
Pg 4 of cover letter	Summary of Changes to Permit	Added summary of changes made to Permit No. 09315T07 according to the most recent requirements of the renewal Title V permit
Page 2 of Permit	Table of Contents	Added Section 3.0 as "Insignificant Activities List" Added Section 4.0 as "General Permit Conditions"
Page 3 of Permit	List of Acronyms	Added "List of Acronyms"
Page 4 of Permit	Permitted Emissions Table	Removed the * and footnote at the bottom of the table.
Page 4 of Permit	Permitted Emissions Table	Changed heat inputs for ES-1-NGF and ES-2-NGF. 502(b)(10) submitted 6/20/2021
Page 4 of Permit	Permitted Emissions Table	Removed ES-3-SD from emissions table and all applicable regulations. Off permit change 12/18/2020
Page 5 of Permit	Permitted Emissions Table	Corrected ES-4-PH heat input from 9 million Btu per hour to 10 million Btu per hour.
Page 5 of Permit	Permitted Emissions Table	Changed maximum heat input for BO1 from 0.95 million BTU per hour to 0.85 million BTU per hour
Page 5 of Permit	Permitted Emissions Table	Added LX5 to permitted emissions table and all applicable regulations. 502(b)(10) 05/15/2020
Page 7 of Permit	2.1 B	Updated Production line description for clarity.
Page 13 of Permit	Section 3	Added Insignificant Activities as Section 3 of the Title V Permit
Page 13 of Permit	Section 3	Add Electric Burnoff Oven to insignificant activities table. 502(b)(10) 05/15/2020
Page 13 of Permit	Section 3	Add Mist Eliminator I9 to insignificant activities table. 502(b)(10) 6/20/2021
Page 14-22 of permit	Section 4	Added General Conditions as Section 4 of the Title V Permit

Changes to the Title V Equipment Editor include:

- An electric burnoff oven I8 will be added to insignificant activities.
- Maximum heat inputs for ES-1-NGF and ES-2-NGF are 3.5 and 2.4 mmBtu/hr, respectively, instead of the 3.1 and 2.1 mmBtu/hr listed on previous permit.
- ES-4-PH has maximum heat input of 10 mmBtu/hr instead of 9 mmBtu/hr.
- Add LX5 two-bank Meltblown machine (2000 lbs/hr maximum process rate).
- BO1 has a 0.85 mmBtu/hr maximum heat input not 0.95 mmBtu/hr maximum heat input.
- Add mist eliminator I9 to insignificant activities list.
- ES-3-SD was removed from the facility.

5. Regulatory Review

Halyard is subject to the following regulations. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0503, Particulate from Fuel Burning Indirect Heat Exchangers – Requires the facility to limit the particulate matter (PM) emissions from any fuel burning indirect heat exchanger, such as the two natural gas-fired boilers (LB4 and ES-LX4B2). LB4 and ES-LX4B2 are limited to 0.56 and 0.51 pounds of PM per million Btu heat input, respectively. No monitoring, recordkeeping, or reporting is required.

Example calculation for LB4: When this allowable emission rate was calculated in the 1st Time Title V permit application review (May 10, 2004), the value of the indirect heat exchanger (LB4) used was 12.8 million Btu heat input.

$$E_{\text{allow}} = 1.090 * Q^{-0.2594}$$

E equals the allowable emission limit for particulate matter in lb/million Btu.

Q equals the maximum heat input in million Btu/hour.

$$\begin{aligned} E &= 1.090 \times (12.8)^{-0.2594} \\ &= 0.56 \text{ pounds PM per million Btu heat input} \end{aligned}$$

Natural gas will produce 0.0075 pounds of PM per million Btu based upon AP-42, Table 1.4-2 emission factors. LB4 was operating during the last inspection conducted by Andrew Kormos 02/24/2023, there were no visible emissions. ES-LX4B2 was not operating. Continued compliance is expected.

- 15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes – Requires the facility to limit the particulate matter emissions from miscellaneous industrial processes, such as LX1, WT1, LX2, WT2, LX3, WT3, LX4, WT4, and WT5, according to the allowable rates. The allowable rate (E) can be calculated by the following equation: $E = 4.10 \times P^{0.67}$, where P is the process rate in tons per hour. In order to comply, the facility shall maintain production records such that the process rate (P) can be derived and make available upon request. No reporting is required. During the inspection conducted by Andrew Kormos 02/24/2023, it was confirmed that the production records are being maintained. They were reviewed from June 2022 to February 2023. Continued Compliance is expected.
- 15A NCAC 02D .0516, Sulfur Dioxide from Combustion Sources - Requires the facility to limit sulfur dioxide emissions from combustion sources, such as sources ES-2-PH, ES-4-PH, ES-4-HAK, ES-4-IR, ES-4-D, ES-1-NGF, ES-2-NGF, and BO1. The sulfur dioxide emissions should not exceed 2.3 pounds per million Btu input. No monitoring, recordkeeping, or reporting is required. Natural gas will produce 0.0006 pounds of SO₂ per million Btu based upon AP-42, Table 1.4-2 emission factors. Continued compliance is expected.
- 15A NCAC 02D .0521, Control of Visible Emissions – Requires the facility to control the visible emissions from any emission source that may be discharged from vents or stacks. Sources LX1, WT1, LX2, WT2, ES-2-PH, LX3, WT3, LX4, WT4, WT5, ES-4-PH, ES-4-HAK, ES-4-IR, ES-4-D, ES-1-NGF, ES-2-NGF, and BO1 were manufactured after July 1, 1971. Therefore, the visible emissions from these sources are not to exceed 20 percent opacity when averaged over a

six-minute period. In order to comply, the facility must perform monthly visible emissions observations of sources LX1, WT1, LX2, WT2, LX3, WT3, LX4, WT4, WT5, and BO1. If the visible emissions observed are above normal, corrective action must be taken. The monthly visible emissions observations must be recorded and maintained in a logbook with dates, times, results, and any corrective action noted. The facility must submit a summary report of the observations on a semi-annual basis. For sources ES-2-PH, ES-4-PH, ES-4-HAK, ES-4-IR, ES-4-D, ES-1-NGF, and ES-2-NGF, no monitoring, recordkeeping, or reporting is required. During the inspection conducted by Andrew Kormos 02/24/2023, observing the stacks for the sources on the building’s roof, LX-3 appeared to have 10% opacity emissions, and LX4 exhibited about 15% opacity emissions. The monthly visible emissions observations records were reviewed from June 2022 to February 2023 and found to be complete. The last semi-annual report was received on January 25, 2023, and it reported no excessive visual emissions. It should be noted that the facility has been conducting visual emission observations for LX-5 as well. Continued compliance is expected.

- 15A NCAC 02D .0524, New Source Performance Standards (40 CFR Part 60, Subpart Dc) – The facility is subject to 40 CFR Part 60, Subpart Dc for “Small Industrial-Commercial-Institutional Steam Generating Units” due to the affected boiler LB4. LB4 is subject to this rule as it is greater than 10 MMBtu/hr and was constructed after June 9, 1989. Under this rule, the facility shall record and maintain the amounts of each fuel fired during each calendar month. During the inspection conducted by Andrew Kormos 02/24/2023, the natural gas usage records were reviewed and found complete. In 2022, the facility used 44,073.9 dekatherms, in which 40% is attributed to LB4. In 2023, the facility had records showing 2,178.2 dekatherms used to date. The facility appears to be in compliance with 02D .0524 and NSPS Subpart Dc.
- 15A NCAC 02D .1100, Control of Toxic Air Pollutants - Requires the facility to limit practices that release toxic air pollutant (TAP) emissions. In accordance with the approved air toxics compliance demonstration, the emission limits in the table below shall not be exceeded.

Toxic Air Pollutant	Emission Limit(s)	CY2021 Highest Emission Rates*
Arsenic (unlisted compounds)	0.12 pounds per year	0.051 pounds per year
Benzene (71-43-2)	1,030 pounds per year	393.45 pounds per year
Cadmium (7440-43-9)	0.67 pounds per year	0.26 pounds per year
Chromium VI (non-specific compounds)	0.85 pounds per year	0.33 pounds per year
Di(2-ethylexyl)phthalate (117-81-7)	0.86 pounds per day	0.36 pounds per day
Hexane, n- (110-54-3)	28.8 pounds per day	10.94 pounds per day
Methylene chloride (75-09-2)	2,700 pounds per year AND 0.308 pounds per hour	1,193.43 pounds per year AND 0.14 pounds per hour
*Based on 24 hours per day, 7 days per week, and 52 weeks per year operation.		

To ensure compliance with the limits, the following restrictions shall apply:

- Spunbond/Meltdown machine (ID No. LX1) is limited to a 7,050 pounds per hour maximum process rate and an annual process rate of 35,478,000 pounds per year.
- Spunbond/Meltblown machine (ID No. LX2) is limited to a 6,600 pounds per hour maximum process rate;
- Spunbond machine (ID No. LX3) is limited to a 6,000 pounds per hour maximum process rate; and

- Spunbond/Meltblown machine (ID No. LX4) is limited to a 12,000 pounds per hour maximum process rate.
- Spunbond/Meltblown machine (ID No. LX5) is limited to a 2,000 pounds per hour maximum.
- The Permittee shall limit facility-wide annual natural gas combustion to 603 mmscf/yr.

The facility shall keep records of the maximum hourly process rate and the date of occurrence for each line. Also, the facility shall keep monthly records of the amount of natural gas combusted facility wide. The facility shall submit a semi-annual summary report containing the highest hourly process rate and the date of the occurrence for each machine, the monthly amount of natural gas combusted facility-wide for the previous 17 months, and the rolling 12-month totals of natural gas combusted for the previous 6 months. During the inspection conducted by Andrew Kormos 02/24/2023, the records were reviewed for June 2022 to February 2023 and found to be complete. The last semi-annual report was received on January 25, 2023, with no deviations. The following table summarizes the maximum process rates and natural gas combustion since the time of the last inspection. The facility appears in compliance with 2D .1100.

Machine ID No.	Maximum Process Rate [lbs/hr] in 2022	Date of Occurrence
LX1	4,640	12/12/2022
LX2	5,907	11/06/2022
LX3	4,135	01/14/2022
LX4	7,350	02/23/2022

- 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions – This regulation is state enforceable only and requires the facility to control and prohibit odorous emissions. During the inspection conducted by Andrew Kormos 02/24/2023, there were no detectable objectionable odors encountered near the property boundary. A review of the facility file showed that no odor complaints have been received by this office. The facility appears to be in compliance with 2D .1806. Continued compliance is anticipated.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

The facility is subject to 40 CFR Part 60, Subpart Dc for “Small Industrial-Commercial-Institutional Steam Generating Units” due to the affected boiler (LB4). LB4 is subject to this rule as it is greater than 10 MMBtu/hr and was constructed after June 9, 1989. Under this rule, the facility shall record and maintain the amounts of each fuel fired during each calendar month. During the inspection Andrew Kormos 02/24/2023, the natural gas usage records were reviewed and found complete. In 2022, the facility used 44,073.9 dekatherms, in which 40% is attributed to LB4. In 2023, the facility had records showing 2,178.2 dekatherms used to date. The facility appears to be in compliance with 2D .0524 and NSPS Subpart Dc. Continued compliance is expected.

NESHAP/MACT

The facility is subject to a National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation. The facility is subject to 40 CFR Part 63, Subpart ZZZZ for “Stationary Reciprocating Internal Combustion Engines” due to the 256-kW natural gas-fired emergency generator (I5) and the 290 HP diesel-fired fire pump (I2). Per this rule, engines are considered “existing” if construction commenced before June 12, 2006, and are considered “new” if construction commenced on or after this date. For the generator (I5), its only requirement is to comply with NSPS Subpart JJJJ as

discussed below. For the existing fire pump, the compliance date was May 3, 2013, and the facility is required to do the following:

- Emergency stationary RICE must a) change oil and filter every 500 hours of operation or annually, whichever comes first; b) inspect air cleaner or spark plugs every 1,000 hours of operation or annually, whichever comes first; and c) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. There are no other operating limitations, fuel requirements, or performance tests required.
- The facility with an engine subject to the oil change requirements has the option of utilizing an oil analysis program in order to extend the specified oil change requirement, as described under §63.6625(j).
- The stationary RICE must be operated and maintained according to the manufacturer's emission-related operation and maintenance instructions, or facilities must develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- The engine's time spent at idle during startup must be minimized. The facility must also minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- Operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for up to 50 hours per year is prohibited. There is no time limit on the use of emergency stationary RICE in emergency situations. Operation for maintenance checks and readiness testing is limited to 100 hours per year. Operation in non-emergency situations is allowed up to 50 hours per year, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility.
- The engine must be equipped with a non-resettable hour meter. The facility must keep records which would support that the 100 hour per year operating limit is not exceeded, and the facility must document why the engine was operated and maintain records to support that the work practices were followed.

During the inspection conducted by Andrew Kormos 02/24/2023, the fire pump engine's non-resettable hour meter read 656.0 hours while the emergency generator was at 269.9 hours. Since the previous inspection, the fire pump engine was operated 17.3 hours and the generator was operated 25.2 hours. The facility last conducted maintenance on September 28, 2022, with R & E Services LLC, and changed the oil and filters. The facility appears to be in compliance with the requirements of NESHAP Subpart ZZZZ.

The facility is subject to 40 CFR Part 60, Subpart JJJJ for "Stationary Spark Ignition Internal Combustion Engines" due to the 256-kW natural gas-fired emergency generator (I5) added in March 2016. The engine is subject as it was constructed after June 12, 2006, and manufactured after January 1, 2009. To comply, the engine must be certified, and the facility must operate and maintain the engine according to manufacturer specifications. The engine must be fitted with a non-resettable hour meter. Operation for maintenance checks and readiness testing is limited to 100 hours per year. Operation in non-emergency situations is allowed up to 50 hours per year, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. There is no time limit on the use of emergency stationary ICE in emergency situations. The facility is required to keep records of all notifications associated with the subpart and records of all maintenance conducted on the engine. The facility must also keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are

spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The generator engine is certified and a member of EPA Family No. GCEXB06.8GDC. The facility last conducted maintenance on September 28, 2022, with R & E Services LLC. It should also be noted that the facility conducts weekly maintenance and test running of both the generator and fire pump engine. Continued compliance is expected.

PSD

This facility is not classified as a major source for PSD purposes since its potential emissions for each regulated pollutant does not exceed the 250 tons per year threshold value. This facility has never undergone a PSD review. There are no increases associated with this renewal application.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

Halyard does not meet all the criteria for CAM. Therefore, CAM does not apply. This permit renewal does not change the facility’s CAM status.

7. Facility Wide Air Toxics

Pursuant to 15A NCAC 2Q .0711 which requires the facility to limit the toxic air pollutants (TAPs) released in accordance with the Toxic Permit Emission Rates (TPERs). The following table shows the triggered TAPs the facility emits with the associated TPERs. The actual emissions are from the CY2021 emissions inventory since the CY2022 inventory has not yet been reviewed. The facility appears to be in compliance with 2Q .0711.

Toxic Air Pollutant (CAS Number)	TPERs Limitations				CY2021 Actual Emissions*
	Carcinogens (lbs/yr)	Chronic Toxicants (lbs/day)	Acute Systemic Toxicants (lbs/hr)	Acute Irritants (lbs/hr)	
Beryllium (7441-41-7)	0.28				0.0078 lbs/yr
Carbon disulfide (75-15-0)		3.9			0.175 lbs/day
Carbon tetrachloride (56-23-5)	460				3.10 lbs/yr

Toxic Air Pollutant (CAS Number)	TPERs Limitations				CY2021 Actual Emissions*
	Carcinogens (lbs/yr)	Chronic Toxicants (lbs/day)	Acute Systemic Toxicants (lbs/hr)	Acute Irritants (lbs/hr)	
Chlorobenzene (108-90-7)		46			0.00034 lbs/day
Chloroform (67-66-3)	290				46.27 lbs/yr
Dichlorobenzene, p- (106-46-7)				16.8	0.000032 lbs/hr
Ethylene dichloride (107-06-2)	260				1.97 lbs/yr
Formaldehyde (50-00-0)				0.04	0.0020 lbs/hr
Manganese and compounds		0.63			0.00025 lbs/day
Methyl chloroform (71-55-6)		250		64	0.00059 lbs/hr
Methyl ethyl ketone (78-93-3)		78		22.4	0.028 lbs/hr
Mercury, vapor (7439-97-6)		0.013			0.00014 lbs/day
Nickel metal (7440-02-0)		0.13			0.0013 lbs/day
Phenol (108-95-2)			0.24		0.0044 lbs/hr
Styrene (100-42-5)			2.7		0.0020 lbs/hr
Toluene (108-88-3)		98		14.4	0.012 lbs/hr
*Based on 24 hours per day, 7 days per week, and 52 weeks per year operation. Also note that the CY2021 emissions inventory is currently under review.					

8. Facility Emissions Review

The facility-wide potential emissions do not change under this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the years 2017 through 2021 are provided in the header of this permit review.

9. Compliance Status

DAQ has reviewed the compliance status of Halyard. During the inspection, conducted on February 24, 2023 by Andrew Kormos of Winston-Salem Regional Office, the facility appeared to be in compliance with all applicable requirements. On March 19, 2019, this facility was issued a NOD for failing to fulfill the maintenance requirements of NESHAP Subpart ZZZZ by failing to conduct maintenance on the diesel-fired fire pump (I2) in the 2018 calendar year. The response to this letter was received on March 28, 2019.

10. 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 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 provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

12. Recommendations

The permit renewal application for Halyard North Carolina, LLC. located in Linwood, Davidson County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 05635T17.