

## Application Review

Issue Date: Date needed

**Region:** Mooresville Regional Office  
**County:** Alexander  
**NC Facility ID:** 0200089  
**Inspector's Name:** Joe Foutz  
**Date of Last Inspection:** 07/27/2023  
**Compliance Code:** 3 / Compliance - inspection

<p style="text-align: center;"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Royal Comfort Seating, Inc. -Plant No. 1</p> <p><b>Facility Address:</b>          140 Alspaugh Dam Road          Taylorsville, NC 28681</p> <p><b>SIC:</b> 3086 / Plastics Foam Products  <b>NAICS:</b> 32614 / Polystyrene Foam Product Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V                      <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V                              <b>After:</b> Title V</p>	<p style="text-align: center;"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b> 15A NCAC 02D .0515, 02D .0521, 02D.1806          02Q.0317 of 02D .0530</p> <p><b>NSPS:</b> N/A  <b>NESHAP:</b> N/A  <b>PSD:</b> N/A  <b>PSD Avoidance:</b> VOCs  <b>NC Toxics:</b> N/A  <b>112(r):</b> N/A  <b>Other:</b> N/A</p>
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Contact Data			Application Data
<p style="text-align: center;"><b>Facility Contact</b></p> <p>Bradley Looper          Operations Manager          (828) 640-3843          PO Box 235          Taylorsville, NC 28681          BrdKLoop@att.net</p>	<p style="text-align: center;"><b>Authorized Contact</b></p> <p>Clyde Goble          President          PO Box 235          Taylorsville, NC 28681          (828) 632-2865          CWGoble@gmail.com</p>	<p style="text-align: center;"><b>Technical Contact</b></p> <p>Bradley Looper          Operations Manager          (828) 640-3843          PO Box 235          Taylorsville, NC 28681          BrdKLoop@att.net</p>	<p><b>Application Number:</b> 0200089.22B  <b>Date Received:</b>  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b style="text-align: center;">Existing Permit Data</b>  <b>Existing Permit Number:</b> 08939T04  <b>Existing Permit Issue Date:</b> 07/10/2018  <b>Existing Permit Expiration Date:</b> 6/30/2023</p>

<b>Total Actual emissions in TONS/YEAR:</b>							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	---	14.76	---	---	14.76	14.76 [TCE (trichloroethylene)]
2020	---	---	17.53	---	---	17.53	17.53 [TCE (trichloroethylene)]
2019	---	---	9.52	---	---	8.87	8.87 [TCE (trichloroethylene)]
2018	---	---	26.20	---	---	20.35	20.35 [TCE (trichloroethylene)]
2017	---	---	15.20	---	---	14.00	14 [TCE (trichloroethylene)]

<p><b>Review Engineer:</b> Jacob Larson</p> <p><b>Review Engineer's Signature:</b>                      <b>Date:</b></p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue:</b> 08939T05  <b>Permit Issue Date:</b> <span style="background-color: yellow;">Date needed</span>  <b>Permit Expiration Date:</b> <span style="background-color: yellow;">Date needed</span></p>
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## 1. Purpose of Application

Royal Comfort Seating, Inc. – Plant No. 1 currently holds Title V Permit No. 08939T04 with an expiration date of June 30, 2023 for a cushion manufacturer for upholstery including a glue spraying operation located in Taylorsville, Alexander County, North Carolina. This permit application is for a permit renewal without modification. The renewal application was received on December 08, 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.

Royal Comfort Seating has one permitted Foam Fabrication Process consisting of one Glue Spraying Operation (ES-2) containing 6 spray booths with 2 spray stations on each side of the booth (per renewal application 0200089.22B), for a total of 12 active glue spraying stations. The facility has ductwork that can accommodate 2 more spray booths (4 spray guns/stations) but the spray booths have been removed. However, during a recent site inspection, an unpermitted building (ES-3) was discovered that had been constructed and was operational without having received an air permit for these sources. This newer building contained two glue spray booths (at the time of inspection) with each booth consisting of 2 glue spray stations. Currently, building 2 no longer conducts any glue spraying operations. The unpermitted spray booths and spray guns have been removed and the ductwork in building 2 has been filled with spray-foam insulation.

## 2. Facility Description

Royal 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 slitter. This facility is located in Taylorsville, Alexander County, North Carolina.

## 3. History/Background/Application Chronology

### History/Background

July 10, 2018	Air Permit No. 08939T04 was issued on July 10, 2018 with an expiration date of June 30, 2023.
March 12, 2019	Notice of Violation (NOV) of Air Permit No. 08939T04, General Condition P. Permittee response to NOV including annual compliance certification resolving violation on March 18, 2019.
September 24, 2020	Notice of Violation and Recommendation for Enforcement (NOV/NRE), of Air Permit No. 08939T04, Specific Limitations and Conditions Nos. 2.1.A.2.e and 2.1.A.4.d. Permittee response to NOV/NRE to resolve violation on October 05, 2020.
July 21, 2021	NOV of Air Permit No. 08939T04, Specific Conditions and Limitations No. 2.1.A.2.d, failure to properly maintain records of visual emissions. Permittee response to NOV to resolve violation July 30, 2021.

February 16, 2022 NOV of Air Permit No. 0839T04, Specific Conditions and Limitations 2.1.A.2.e and 2.1.A.2.d. Permittee response to NOV to resolve violation February 28, 2022.

March 25, 2022 NOV/NRE, of Air Permit No. 08939T04, General Condition P. Permittee response to NOV/NRE to resolve violation on April 04, 2022.

July 25, 2022 NOV of North Carolina General Statute 143-215.108, construction, and operation of equipment without a permit. Permittee response received September 9, 2022.

September 14, 2022 Air permit application 0200089.22A for minor modification of Air Permit No. 08939T04 did not contain all required elements. Application deemed incomplete.

July 19, 2023 Air permit application 0200089.22A was paused via a request letter from the applicant. The DAQ contacted Royal Comfort via email on two separate occasions (August 7<sup>th</sup> and 30<sup>th</sup>, 2023 requesting the submittal of a withdrawal request with authorized contact signature for application 0200089.22A.)

August 18, 2023 Air permit application 0200089.22A was withdrawn via request from applicant.

Application Chronology

December 08, 2022 DEQ received permit application 0200089.22B for Title V renewal.

December 09, 2022 Sent acknowledgment letter indicating that the application for permit renewal was complete.

June 03, 2023 Draft permit and review forwarded for comments to Permitting Supervisor.

June 28, 2023 Comments received from Booker Pullen, Permitting Supervisor.

August 16, 2023 Draft permit and review forwarded to the Mooresville Regional Office for comments. Minor comments were received August 22, 2023.

August 23, 2023 Draft permit and review forwarded to the Stationary Compliance Branch for comments. Minor comments were received August 28, 2023.

XXXX xx, 2023 Draft permit forwarded to the applicant for comments. \_\_\_\_ comments were received XXXX xx, 2023.

XXXX xx, 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	<ul style="list-style-type: none"> <li>Updated all dates and permit revision numbers.</li> </ul>
3	Cover page	<ul style="list-style-type: none"> <li>Added "Notice Regarding The Right To Contest A Division Of Air Quality Permit Decision" page</li> </ul>
4	Summary of Changes to Permit	<ul style="list-style-type: none"> <li>Added summary of changes made to Permit No. 09315T07 according to the most recent requirements of the renewal Title V permit</li> </ul>
2	Table of Contents	<ul style="list-style-type: none"> <li>Added Section 3.0 as "Insignificant Activities List"</li> <li>Added Section 4.0 as "General Permit Conditions"</li> </ul>
3	List of Acronyms	<ul style="list-style-type: none"> <li>Added "List of Acronyms"</li> </ul>
6	2.1.A.4.a.	<ul style="list-style-type: none"> <li>Referenced emission source was corrected from ES-1 to ES-2</li> </ul>
6	2.1.A.4.c.	<ul style="list-style-type: none"> <li>Updated permit condition for clarity</li> </ul>
10	Section 3	<ul style="list-style-type: none"> <li>Added Insignificant Activities as section 3 of the Title V Permit</li> </ul>
11-19	Section 4	<ul style="list-style-type: none"> <li>Added the most current General Conditions (Revision 7) as Section 4 of the Title V Permit</li> </ul>

This permit renewal is without modification, and no changes to the Title V Equipment Editor are needed.

#### 5. Regulatory Review

This facility is subject to the following air quality regulations, in addition to the requirements in the General Conditions:

##### **15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

This rule applies to stacks, vents, or outlets emitting particulates from industrial processes for which no other emission control standards are applicable. The allowable emission rate is in terms of pounds per hour and is calculated using the following equation since the process input rate is less than 30 tons per hour:

$$\text{For process rates up to 30 tons per hour:}$$

$$E = 4.10(P)^{0.67}$$

Where: E = Allowable emission rate in pounds per hour  
P = Process weight in tons per hour

The glue spraying operation (**ID No.ES-2**) is subject to 15A NCAC 02D .0515.

At some later date, we should get the process rate input into the foam fabrication process so that we could use the equation. We should ask the consultant who filled out the application.

$$\text{For process rates up to 30 tons per hour:}$$

$$E = 4.10(P)^{0.67}$$

Royale will be required to maintain production records in tons per hour to demonstrate compliance with the allowable emissions limit, but no reporting for particulate emissions is required from this

uncontrolled source. Due to the small amount of PM emission (shown above in the emission calculations), compliance with this standard is expected.

#### **15A NCAC 02D .0521 CONTROL OF VISIBLE EMISSIONS**

This regulation applies to fuel burning operations and industrial processes where visible emissions can be reasonably expected to occur. Sources subject to visible emissions standards under specifically identified rules under 02D (including .0508, .0524, and .1111) are required to meet the standards of those rules instead of the standards in 02D .0521. Emission sources manufactured after July 1, 1971, have a visible emissions limit of 20 percent opacity when averaged over a 6-minute period. The 6-minute averaging periods may exceed 20 percent if no 6-min period exceeds 87 percent opacity, no more than one six-minute period exceeds 20 percent opacity in one hour, and no more than 4 6-minute periods exceed 20 percent in any 24-hour period. Compliance with this standard is demonstrated by conducting either daily, weekly, monthly, or semiannual stack observations. Glue spraying operations (**ID No. ES-2**) are required to conduct monthly observations to ensure compliance with the 20 percent opacity visible emissions standard, along with recordkeeping and reporting. Continued compliance is expected.

#### **15A NCAC 02D .1806: CONTROL OF PROHIBITION OF ODOROUS EMISSIONS (State-enforceable only)**

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. Continued compliance is expected.

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

#### **NSPS**

The facility is not currently subject to any New Source Performance Standards. This permit renewal does not change the facility's NSPS status.

#### **NESHAP/MACT**

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 40 CFR 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 slitter affected source as defined in 40 CFR 63.8782.

As stated above, this facility is not considered a "Flexible Polyurethane Foam Production" plant and it is also not subject to 40 CFR 63 Subpart M. There appears to be no specific MACT/ NESHAP for this type of facility. However, since this facility has HAP emissions less than 10 tons per year of a single HAP, and less than 25 tons per year for the combination of HAP at this facility, it is still considered an area source. The renewal of this facility does not change this status.

PSD

Alexander County is currently designated as attainment for all PSD regulated pollutants. Alexander County is triggered for SO<sub>2</sub> with respect to minor source baseline date. However, this permit renewal does not affect this triggered pollutant.

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 02D .0530, Prevention of Significant Deterioration (PSD):

Emission Source(s)	PSD Avoidance Condition for VOC
Foam fabrication process consisting of glue spraying operation	< 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). Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. Continued compliance is expected.

112I

112I of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112I thresholds. No change with respect to 112I is anticipated under this permit renewal.

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).

No controls are being currently used or are proposed as part of this renewal. CAM does not apply.

**7. 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.

## 8. Facility Emissions 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 renewal does not affect the Title V status of this facility.

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

## 9. Compliance Status

The following Notices of Violation (NOV) and Recommendation of Enforcement (NRE) have been issued to Royal Comfort Seating:

- March 12, 2019      Notice of Violation (NOV) of Air Permit No. 08939T04, General Condition P. Permittee response to NOV including annual compliance certification, resolving violation on March 18, 2019. No further action required.
  
- September 24, 2020      Notice of Violation and Recommendation for Enforcement (NOV/NRE), of Air Permit No. 08939T04, Specific Limitations and Conditions Nos. 2.1.A.2.e and 2.1.A.4.d. Permittee response to NOV/NRE with required reports October 05, 2020. Received payment of civil penalty on April 9, 2021. No further action required.
  
- July 21, 2021      NOV of Air Permit No. 08939T04, Specific Conditions and Limitations No. 2.1.A.2.d, failure to properly maintain records of visual emissions. Permittee response to NOV with the required explanation of corrective actions July 30, 2021. No further actions required.
  
- February 16, 2022      NOV of Air Permit No. 0839T04, Specific Conditions and Limitations 2.1.A.2.e and 2.1.A.2.d. Permittee response to NOV including required reports received February 28, 2022. No further actions required.
  
- March 25, 2022      NOV/NRE, of Air Permit No. 08939T04, General Condition P. Permittee response to NOV/NRE including the required, annual compliance certification received April 04, 2022. Received payment of civil penalty on June 16, 2022. No further actions required.
  
- July 25, 2022      NOV of North Carolina General Statue 143-215.108, construction, and operation of equipment without a permit (Building 2). Application for modification No. 0200089.22A on September 9, 2022. The facility requested that the Division of Air Quality place the application for modification proposed in No. 0200089.22A to be paused due to Business conditions. Inspection conducted on 07/27/2023 by Joe Foutz demonstrated that unpermitted equipment was removed, and facility was in compliance.



## **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 Royal Comfort Seating, Inc. – Plant No. 1. located in Taylorsville, Alexander 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. 08939T05.