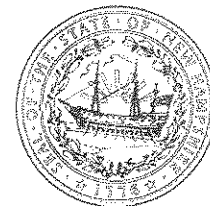




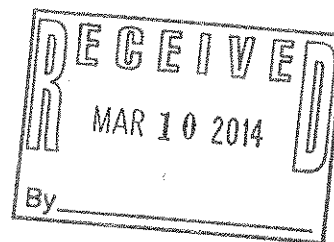
The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

March 4, 2014

Kenneth Boranian, General Manager
Perfect Fit Yarn, LLC
25 Canal ST
Allentown, NH 03275



RE: On-Site Full Compliance Evaluation Report

Dear Mr. Boranian:

The New Hampshire Department of Environmental Services, Air Resources Division ("DES") has completed a Full Compliance Evaluation of Perfect Fit Yarn, LLC ("Perfect Fit"). The compliance evaluation included an on-site inspection completed on February 19, 2014. This is a copy of the On-Site Full Compliance Evaluation Report for your review and records.

DES identified deficiencies during this compliance evaluation, as detailed in this report.

The results of the compliance evaluation may be forwarded to the Enforcement Section for further review. If you have any questions, please do not hesitate to give Alan Moulton a call at (603) 271-6797 or by email at Alan.Moulton@des.nh.gov.

Sincerely,

Greg Helve
Compliance Assessment Section Supervisor
Air Resources Division

cc: Town Administrator, Town of Allentown, 16 School ST, Allentown, NH 03275

Abbreviations and Acronyms

AAL	Ambient Air Limit
acf	actual cubic foot
ags	above ground surface
ASTM	American Society of Testing and Materials
Btu	British thermal units
CAS	Chemical Abstracts Service
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DER	Discrete Emission Reduction
DES	New Hampshire Department of Environmental Services
Env-A	New Hampshire Code of Administrative Rules – Air Resources Division
ERC	Emission Reduction Credit
ft	foot or feet
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
kW	kilowatt
lb	pound
LPG	Liquefied Petroleum Gas
MM	million
MSDS	Material Safety Data Sheet
MW	megawatt
NAAQS	National Ambient Air Quality Standard
NG	Natural Gas
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standard
PM ₁₀	Particulate Matter < 10 microns
ppm	parts per million
psi	pounds per square inch
RACT	Reasonably Available Control Technology
RSA	Revised Statutes Annotated
RTAP	Regulated Toxic Air Pollutant
scf	standard cubic foot
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate
tpy	tons per consecutive 12-month period
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

I. Facility Description

DES conducted an On-Site Full Compliance Evaluation of Perfect Fit on February 19, 2014. The compliance evaluation covers the period 2008 to February 19, 2014, and the results are presented herein.

Perfect Fit manufactures knitting yarn. The raw material for the yarn is dyed prior to arriving at the facility. The company does not dye or treat the yarn. The company takes the dyed material fibers and spins them into yarn. The yarn is sold as knitting yarn. Perfect Fit has a permit for two boilers (a 10.88 MMBtu/hr unit and an 8.70 MMBtu/hr unit) that produce steam for the building heat and process operations.

Facility name and address	Perfect Fit Yarn, LLC 25 Canal ST Allenstown, New Hampshire 03275
County	Merrimack
Telephone	(603) 485-7161
AFS#	3301300021
Source Type	Minor
Inspection Date/Time	February 19, 2014, 10:10 am
Inspection Type	On-Site Full Compliance Evaluation
Weather	25-30 Deg. F., calm wind, partially sunny
Inspection Period	2008 to February 19, 2014
Inspected by	Alan Moulton, DES Compliance Assessment Engineer Sheila Rydel, Senior State Permit Engineer
Source Contact(s)	Ken Boranian, General Manager Gene Heath, Maintenance Manager
Last Inspection	December 2, 2004
Last Inspection Results: <ul style="list-style-type: none">a) Perfect Fit operated its two boilers without a valid permit to operate from June 1, 2001 through May 28, 2004.b) Perfect Fit had not maintained fuel usage records for calendar year 2000.c) Perfect Fit had not submitted Annual Emissions Reports for calendar years 1998 through 2003. (On January 25, 2005, DES received from Perfect Fit Emissions Reports for years 2001 through 2004.)d) Perfect Fit had not submitted annual emission-based fees for calendar years 1998 through 2003. (On November 17, 2005, DES received from Perfect Fit payment on Emission-based fees owed for years 2001 through 2004.)	

Permit Number(s):

SP-0037: Issued July 14, 2009, Expires July 31, 2014

Note: Renewal application filed on January 23, 2009, application shield applied.

FP-S-0238: Issued May 29, 2004, Expired May 31, 2009

The on-site inspection included an opening meeting to discuss the purpose of the inspection as well as the rules pertaining to claims of confidentiality and facility safety concerns. Perfect Fit agreed to the inspection and authorized access. Material provided and operations conducted by the facility at the time of the inspection were not claimed as confidential.

II. Emission Unit Identification and Facility Wide Emissions

Table 1 below, taken from permit SP-0037, lists the permitted emission units as verified during the inspection.

Table 1 - Emission Unit Identification				
Emission Unit ID	Device Identification	Manufacturer Model Number Serial Number	Installation Date	Maximum Design Capacity and Fuel Type(s)
EU01	Boiler #1	Bigelow NHB ID 12400 3913	March 1951	10.88 MMBtu/hr #4 fuel oil – equivalent to 75 gal/hr
EU02	Boiler #2	Bigelow NHB ID 12401 3914	March 1951	8.70 MMBtu/hr #4 fuel oil – equivalent to 60 gal/hr

DES observed the devices identified in this table and the facility has made no changes to these devices nor has it added devices classified as significant or insignificant activities. Boiler #2 (EU02) was in operation during the inspection. Boiler #1 (EU01) was not in operation during the inspection.

The table below lists the facility-wide reported annual emissions for the review period.

Facility-Wide Reported Annual Emissions					
	Nitrogen Oxides (tpy)	Sulfur Dioxide (tpy)	Carbon Monoxide (tpy)	Particulate Matter (tpy)	VOCs (tpy)
Permitted Limits	---	---	---	---	---
2012	0.24	1.78	0.06	0.05	0.00
2011	0.24	1.78	0.06	0.05	0.00
2010	0.30	2.22	0.07	0.06	0.01
2009	0.24	1.78	0.06	0.05	0.00
2008	0.24	1.78	0.06	0.05	0.00

III. Control Equipment

There is no air pollution control equipment required for the devices listed in Table 1.

IV. Stack Criteria

Table 2 below, taken from permit SP-0037, lists the permitted stack requirements for the facility. During the inspection, DES observed that the stack was vertical and unobstructed, with no modifications.

Table 2 - Stack Criteria			
Stack Number	Emission Unit or Pollution Control Equipment ID	Minimum Height (feet above ground surface)	Maximum Exit Diameter (feet)
1	EU01 and EU02	115	4

V. **Compliance with Operating and Emission Limitations**

Table 3 below, taken from permit SP-0037, lists the operation and emission limitations for the facility, and any deficiencies noted during the evaluation.

Table 3 - Operating and Emission Limitations				
Item #	Requirement	Applicable Emission Unit	Regulatory Basis	Compliant
1	<u>Maximum Sulfur Content Allowable in Liquid Fuels</u> The sulfur content of No. 4 oil shall not exceed 1.0 percent sulfur by weight.	EU01 & EU02	Env-A 1604.01(b)	Yes
2	<u>Fuel Usage Limitations</u> Fuel consumption for the two boilers combined shall be limited to 150,000 gallons of #4 fuel oil in any consecutive 12-month period.	EU01 & EU02	PO-B-0858 & PO-B-0859 Issued 10/11/96	Yes
3	<u>Particulate Emission Standards for Fuel Burning Devices Installed on or Prior to May 13, 1970</u> The particulate matter emissions from fuel burning devices installed on or prior to May 13, 1970 shall not exceed 0.59 lb/MMBtu.	EU01	Env-A 2002.06	Unknown
Finding: Compliance can only be determined by stack testing, which is not required at this time.				
4	<u>Particulate Emission Standards for Fuel Burning Devices Installed on or Prior to May 13, 1970</u> The particulate matter emissions from fuel burning devices installed on or prior to May 13, 1970 shall not exceed 0.60 lb/MMBtu.	EU02	Env-A 2002.06	Unknown
Finding: Compliance can only be determined by stack testing, which is not required at this time.				
5	<u>Visible Emission Standard for Fuel Burning Devices Installed on or Prior to May 13, 1970</u> The average opacity from fuel burning devices installed on or prior to May 13, 1970 shall not exceed 40 percent for any continuous 6-minute period.	EU01 & EU02	Env-A 2002.01	Yes
6	<u>Activities Exempt from Visible Emission Standards</u> The average opacity shall be allowed to be in excess of those standards specified in Env-A 2002.02 for one period of 6 continuous minutes in any 60 minute period during startup, shutdown, malfunction, soot blowing, grate cleaning, and cleaning of fires.	EU01 & EU02	Env-A 2002.04(c)	Yes

Table 3 - Operating and Emission Limitations				
Item #	Requirement	Applicable Emission Unit	Regulatory Basis	Compliant
7	<p><u>Activities Exempt from Visible Emission Standards</u></p> <p>Exceedances of the opacity standard in Env-A 2002 shall not be considered violations if the Owner or Operator demonstrates to the Division that such exceedances:</p> <ul style="list-style-type: none"> a. Were the result of the adherence to good boiler operating practices which, in the long term, result in the most efficient or safe operation of the boiler; b. Occurred during periods of cold startup of a boiler over a continuous period of time resulting in efficient heat-up and stabilization of its operation and the expeditious achievement of normal operation of the unit; c. Occurred during periods of continuous soot blowing of the entire boiler tube section over regular time intervals as determined by the operator and in conformance with good boiler operating practice; or d. Were the result of the occurrence of an unplanned incident in which the opacity exceedance was beyond the control of the operator and in response to such incident, the operator took appropriate steps in conformance with good boiler operating practice to eliminate the excess opacity as quickly as possible. 	EU01 & EU02	Env-A 2002.04(d), (e), and (f)	Yes

VI. Compliance with Monitoring and Testing Requirements

Table 4 below, taken from permit SP-0037, lists the monitoring and testing requirements for the facility, and any deficiencies noted during the evaluation.

Table 4 - Monitoring and Testing Requirements						
Item #	Parameter	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis	Compliant
1	To Be Determined	When conditions warrant, the Division may require the Owner or Operator to conduct stack testing in accordance with USEPA or other Division approved methods.	Upon request by the Division	Facility Wide	RSA 125-C:6, XI	Not Applicable
<p><i>Finding: Division has not required extra testing to date.</i></p>						

Table 4 - Monitoring and Testing Requirements						
Item #	Parameter	Method of Compliance	Frequency	Applicable Unit	Regulatory Basis	Compliant
2	Sulfur Content of Liquid Fuels	Conduct testing in accordance with appropriate ASTM test methods or retain delivery tickets in accordance with Table 5, Item 3 in order to demonstrate compliance with the sulfur content limitation provisions specified in this permit for liquid fuels.	For each delivery of fuel oil/diesel to the facility	Facility Wide	Env-A 806.02 & Env-A 806.05	Yes

VII. Compliance with Recordkeeping Requirements

Table 5 below, taken from permit SP-0037, lists the recordkeeping requirements for the facility, and any deficiencies noted during the evaluation.

Table 5 - Recordkeeping Requirements					
Item #	Requirement	Duration/Frequency	Applicable Unit	Regulatory Basis	Compliant
1	<u>Record Retention and Availability</u> Keep the required records on file. These records shall be available for review by the Division upon request.	Retain for a minimum of 5 years	Facility Wide	Env-A 902	Yes
2	<u>General Recordkeeping Requirements for Combustion Devices</u> Maintain the following records of fuel characteristics and utilization for the fuel used in the combustion devices: a. Type (e.g. diesel fuel, natural gas) and amount of fuel burned in each device, or type and amount of fuel burned in multiple devices and hours of operation of each device to be used to apportion fuel use between the multiple devices.	Monthly	EU01, EU02	Env-A 903.03	Yes
3	<u>Liquid Fuel Oil Recordkeeping Requirements</u> In lieu of sulfur testing pursuant to Table 4, Item 2, the Owner or Operator may maintain fuel delivery tickets that contain the following information: A written statement from the fuel supplier that the sulfur content of the fuel as delivered does not exceed state or federal standards for that fuel.	Whenever there is a change in fuel supplier but at least annually	Facility Wide	Env-A 806.05	Yes

Compliance with Reporting Requirements

Table 6 below, taken from permit SP-0037, lists the reporting requirements for the facility, and any deficiencies noted during the evaluation.

Table 6 - Reporting Requirements					
Item #	Requirement	Frequency	Applicable Emission Unit	Regulatory Basis	Compliant
1	<u>Annual Emissions Report</u> Submit an annual emissions report which shall include the following information; a. Actual calendar year emissions from each emission unit of NO _x , CO, SO ₂ , TSP, VOCs and HAPs; b. The methods used in calculating such emissions in accordance with Env-A 705.02, <i>Determination of Actual Emissions for Use in Calculating Emission-Based Fees</i> ; and c. All information recorded in accordance with Table 5, Items 2 and 3.	Annually (no later than April 15th of the following year)	EU01 & EU02	Env-A 907.01	No
<i>Findings: Perfect Fit has not included the sulfur content of the #4 fuel oil in the annual emission reports. Perfect Fit has reported the fuel usage and the emissions for each unit in its annual emission reports.</i>					
2	<u>Permit Deviation Reporting Requirements</u> Report permit deviations that cause excess emissions in accordance with Condition VIII.B.	Within 24 hours of discovery of excess emission	EU01	Env-A 911.04(b)	Yes
3	<u>Emission Based Fees</u> Pay emission-based fees in accordance with Condition X.	Annually (no later than April 15th of the following year)	EU01	Env-A 700	No
<i>Findings: Perfect Fit submitted late annual emission-based fees for calendar year 2012. DES received payment of the emission-based fees on May 20, 2014. This was five days late.</i>					

VIII. Permit Deviation Reporting Requirements

Perfect Fit is aware of the recordkeeping and reporting requirements for permit deviations. Since the time of the last inspection, no permit deviations have been reported by the facility.

IX. Other Findings

- a) EPA has promulgated 40 CFR 63, Subpart JJJJJ, *NESHAP for Industrial, Commercial, and Institutional Boilers Area sources*. On October 13, 2011, Perfect Fit submitted an initial notification to EPA of the oil-fired boilers, as required.

For the oil-fired boilers, Subpart JJJJJ requires Perfect Fit to conduct the following:

- An initial tune up of the boilers by March 21, 2014.
- After the initial tune up, tune ups to be conducted every two years thereafter. Periods between tune ups not to exceed 25 months.
- For the boiler rated greater than 10 MMBtu/hr, a one-time Energy Assessment performed by a Qualified Energy Assessor by March 21, 2014.
- Submit to EPA and DES an Initial Notification of Compliance Status by July 19, 2014.

Perfect Fit had both boilers tuned up last fall. The company, at the time of the inspection, did not know about the Energy Assessment. After the inspection, DES, via email, provided Perfect Fit with Energy Assessment information.

X. Enforcement History and Status

During the inspection period, DES has had no enforcement actions against Perfect Fit.

XI. Compliance Assistance, Recommendations and Corrective Actions

During the inspection DES provided the following compliance assistance to the facility:

- a) DES discussed the facility's annual emission reports and indicated that the sulfur content of the fuel must be listed on the reports.
- b) DES discussed the requirements of 40 CFR 63, Subpart JJJJJ and the Energy Assessment that is due to be completed by March 21, 2014. After the inspection, additional information on Subpart JJJJJ was emailed to the facility.

Based on the findings of this compliance evaluation, DES recommends the following actions to bring the facility into compliance with the identified deficiencies and future reporting requirements:

- a) Submit all future annual emission-based fees to DES so that they are received at DES no later than April 15th of each year. If Perfect Fit requires an invoice from DES in order to pay the emission-based fees, then DES should receive the annual emissions report by March 1, at the latest. The cover page of the annual emissions report shall include a statement requesting DES to send an invoice for payment.
- b) Include the sulfur content of the #4 fuel oil used in the boilers on the boiler forms in the Annual Emissions Report.

During the inspection, Perfect Fit gave the inspectors a completed ARD-1 Form that changed the name of the facility to Perfect Fit Yarn, LLC.

Report Prepared By	Alan H. Moulton
Title	Compliance Assessment Engineer
Signed	