The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner

June 30, 2011

Mr. Charles A. Howland
President/CEO
Warwick Mills, Inc.
301 Turnpike Road, PO Box 409
New Ipswich, NH 03071

RE: Inspection Report for Warwick Mills

Dear Mr. Howland:

The New Hampshire Department of Environmental Services, Air Resources Division conducted an On-site Full Compliance Evaluation of Warwick Mills, Inc. (WMI) on May 26, 2011. DES identified the following issues during the inspection:

1. WMI failed to demonstrate that the capture efficiency of the PTE is 100% for EU02 after the coater was modified and relocated to an adjacent room per Table 3, Item 15. b.), 2.)ii.) of TP-0057.

2. The 2010 Semi-Annual Permit Deviation and Monitoring Report and Annual Compliance Certification had numerous omissions and erroneous entries. A list of these discrepancies was given to WMI during the inspection,

3. WMI has not included descriptions of changes to the CPMS, web coating operation or the emission capture system in the Semi-Annual reports as required by Table 6, Item 5) h.5) of TP-0057. Changes such as the additional flow measuring devices for the downdraft tables, the changes associated with EU02 and the movement of EU02 are required to be noted in the Semi-Annual reports required by Table 6, Item 5) h.5) of TP-0057 and the federal MACT standards.

4. WMI has not updated its Env-A 1400 compliance demonstration to the February 2011 revision of Table Env-A 1450-1 within the 90 days as required by Table 3, Item 3 of the Permit. At the time of the inspection, WMI was operating the downdraft tables only and the boiler temperatures were observed to be: Boiler #1= 380 degF and Boiler #2=525 degF. WMI has not demonstrated a minimum destruction efficiency of 95% at these temperatures and therefore must perform an Env-A 1400 compliance demonstration for this and any other time the boilers were operating below the temperatures recorded during the compliance testing of June 2010 as required by Table 3, Item 1.e.) of TP-0057.

5. WMI provided DES with a CPMS Quality Control Program dated May 4, 2011. DES has determined that this plan does not meet the requirements as stated in Table 3, Item 21 of TP-0057. Specifically, this plan does not address the additional monitoring equipment for the downdraft tables, spare parts inventory, calculations, sampling, analysis methods and other data as required by Table 3, Item 21 of TP-0057 and 40 CFR 63.8(d).

In order for WMI to return to compliance:

1. WMI shall coordinate with DES and demonstrate 100% capture and control of the PTE for EU02.

2. WMI shall revise and resubmit the 2010 Annual Compliance Certification and both the 2010 Semi-annual reports correcting the deficiencies noted in Items 2 and 3 above.

3. WMI shall provide DES with an updated Env-A 1400 compliance demonstration using the February 2011 revision of Env-A 1400. WMI shall also provide to DES an Env-A 1400 demonstration for May 26, 2011 when the downdraft tables were operating and the boilers were operating at temperatures below those recorded during compliance testing in June 2010. WMI shall also provide DES an Env-A 1400 compliance demonstration for all other times since October 1, 2010 when the downdraft tables were operating with the boiler temperatures below those recorded during the June 2010 compliance test.

4. WMI shall revise the CPMS Quality Control Program to address all the requirements in Table 3, Item 21 and 40 CFR 63.8(d.) and provide DES with a copy.

5. WMI shall provide to DES a revised copy of the Capture System Monitoring Plan as described in Table 4, Item 12 of TP-0057.

Enclosed is a copy of the Inspection Report for your records.

If you have any questions regarding the inspection or the final report, please feel free to call me at (603) 271-0650.

Sincerely,

Greg Helve

Greg Helve
Senior Compliance Assessment Engineer
Air Resources Division

Enclosure: Warwick Mills On-site Full Compliance Evaluation
cc: Town of New Ipswich – Board of Selectmen

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

ON-SITE FULL COMPLIANCE EVALUATION

Warwick Mills, Inc.
301 Turnpike Road, PO Box 409
New Ipswich, NH 03071
603-878-1565

Hillsborough County

AFS # 3301100129

Inspection Date: May 26, 2011
Final Report: June 30, 2011

Inspected and Report Prepared by:

New Hampshire Department of Environmental Services
Air Resources Division
29 Hazen Drive, P.O. Box 95
Concord, New Hampshire 03302-0095

Greg Helve
Sr. Compliance Assessment Engineer

I. Inspection

On May 26, 2011, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") completed an On-Site Full Compliance Evaluation ("FCE") of Warwick Mills, Inc. (WMI) in New Ipswich, NH (Hillsborough County). WMI was targeted for inspection based on DES inspection criteria, which recommends that a major source be inspected every two years or after the issuance of a Temporary Permit. The On-site FCE was conducted in accordance with EPA's Compliance Monitoring Strategy.

Date/Time of Inspection:	May 26, 2011 9:30 am
Type of Inspection:	On-Site Full Compliance Evaluation
Weather Conditions:	70 degF, partly cloudy, winds light and variable
Inspected by:	Greg Helve- Senior Compliance Assessment Engineer
Source Contact:	Maureen MacAdam- Compliance Manager Jonathan Queen- Manufacturing Manager Peter Ripley- Computer Data System
Last compliance inspection conducted at facility:	August 19, 2009
Last Inspection Result:	Numerous reporting and compliance issues
Permit Number(s):	TP-0001 expired June 30, 2010; application shield applies TP-0057 expires April 30, 2012

The DES Inspector discussed the purpose of the inspection with the WMI personnel and discussed the rules pertaining to claims of confidentiality. Ms. MacAdam agreed to the inspection and authorized access to the facility. No material provided to the DES Inspector during the inspection was stated to be confidential. After the opening meeting and a safety briefing, Ms. MacAdam and members of her team conducted a tour of the facility. During the tour, coaters #1 and #2 were not operating, the downdraft tables were operating, boiler #1 was operating at 380 degF and boiler #2 was operating at 525 degF.

II. Facility Description

WMI manufactures specialty coated fabrics and fabric products, and operates two boilers for building heat, process steam and VOC destruction. Processes include the application of solvent based adhesive primer to woven fabric and the coating of metal coil with hazardous air pollutant (HAP) containing coatings. WMI completed the work on its capture and control system for the minor core activities as required by TP-0057 and demonstrated compliance with the June 2010 testing. WMI also modified EU02 to handle wide fabric similar to EU01. EU02 was moved to an adjacent room to accommodate the modifications. Work was completed in October 2010. WMI operates a diesel fire pump that is below permitting thresholds.

III. Emission Unit Identification and Operating Conditions

Table 1 contains the Emission Unit Identification, Operating Restrictions and Usage Data during this inspection period.

Table 1 – Emission Unit Identification and Operating Data

Emission Unit ID	Process	Manufacturer and Installation Date	Maximum Design Capacity	Reported Operating Data
EU01	Coater 1	Warwick Mills March 2005	Max web width: 65 inches Max feed rate: 15 yards per minute[1]	
EU02	Coater 2	Warwick Mills March 2005	Max web width: 65 inches Max feed rate: 7 yards per minute	
EU03	Slasher 1	Charles B. Johnson- 1940	Max fed rate: 500 lb yarn per hour	
EU04	Slasher 2	Charles B. Johnson-1940	Max feed rate 500 lb yarn per hour	
EU05	Assembly Machine 1	Warwick Mills 2007	Max feed rate 45 placements per minute	
EU06	Assembly Machine 2	Warwick Mills 2007	Max feed rate: 30 placements per minute	
EU07	Tape-off Machine	Warwick Mills 2006	Max feed rate: 140 placements per minute	
EU08	Mixing/Compounding Room	NA	Brick room approximately 8 feet by 12 feet	
EU11	Portable Downdraft Table #1	NA	37,500 feet of seaming	
EU12	Portable Downdraft Table #2	NA	37,500 feet of seaming	
Boilers				
EU09	Boiler 1	Clever Brooks CB-621-50 0-15670 1956-updated 2007	2.475 MMBtu/hr No. 6 fuel oil – equivalent to 16.5 gal/hr 144,540 gals/yr max combined 610 gals/day max combined	2010: 44,802 gal #6 oil 2009: 52,497 gal #6 oil
EU10	Boiler 2	Clever Brooks CB-621-80 0-15671 1956-updated 2007	2.1 MMBtu/hr No. 6 fuel oil – equivalent to 14.0 gal/hr 144,540 gals/yr max combined 610 gals/day max combined	2010: 59,464 gal #6 oil 2009: 61,224 gal #6 oil

[1] Although the coaters EU01 and EU02 have the capacity to feed 15 and 7 yards of web per minute respectively, the rate at which continuous web is coated is dependent on the concentration of the VOC/HAP emissions from the associated curing ovens. Due to health/safety concerns, the processes are only operated at 20-30% of the Lower Explosive Limit (LEL) of the VOC laden fumes leaving the ovens.

IV. Control Equipment

The exhaust gas from each coating process and associated curing oven (EU01 and EU02), and production processes EU05 (WMI assembly machine #1, downdraft table 3), EU06 (WMI assembly machine #2, downdraft table 4), EU11 (WMI downdraft table 5) and EU12 (WMI downdraft table 6) are directed to the boilers (EU09 and EU10) for VOC/HAP destruction. WMI is required to operate EU09 and/or EU10 at all times that production processes EU05, EU06, EU11, and/or EU12 are operating, and whenever EU01 and EU02 are operating and not using coatings that comply with the limitations specified in subparts OOOO and SSSS of 40 CFR 63, sections 63.4291(a)(1), and 63.5120(a)(2), respectively. EU09 and EU10 shall be maintained in accordance with the manufacturer's specifications.

WMI is required to operate a Continuous Parameter Monitoring System (CPMS) to continuously monitor the oxidizer's (boiler's) operating parameters and the capture and control systems for EU01, EU02, EU05, EU06, EU11 and EU12.

V. Stack Criteria

The following devices at the Facility shall have exhaust stacks that discharge vertically, without obstruction, and meet the criteria in Table 2:

Table 2 – Stack Criteria

Stack Number	Emission Unit ID	Maximum Height (above ground surface)	Maximum Exit Diameter (feet)
1	EU03	20.5	1.33
2	EU04	9.5	1.33
5	EU07	5.0	0.25
6	EU08	9.5	0.83
7	EU09 & EU10	21.5	1.33

VI. Compliance with Permitting Requirements

CHAPTER Env-A 300 Ambient Air Quality Standards

DES evaluated WMI's compliance with Ambient Air Quality Standards ("AAQS") in 1999 when WMI applied for a permit to operate two boilers. There were no predicted exceedances of any of the AAQS while complying with the fuel limits noted in the Permit.

CHAPTER ENV-A 500 – Standards Applicable to Certain New or Modified Facilities and Sources of Hazardous Air Pollutants

WMI is not subject to the requirements in 40 CFR 60 subpart Da, Db or Dc, as incorporated by

reference in Env-A 503.01, as the sizes of the boilers are less than the applicable thresholds. WMI is subject to the New Source Performance Standards (NSPS) Subparts TT (Standards of Performance for Metal Coil Surface Coating) and VVV (Standards of Performance for Polymeric Coating of Supporting Substrate Facilities). While the Facility is a major source of Hazardous Air Pollutants ("HAPs"), these HAPs are not regulated by 40 CFR 61, as incorporated by reference in Env-A 504.01. Instead, these HAP emissions are regulated by the Maximum Achievable Control Technology (MACT) Standards referenced in Env-A 505.01, specifically; 40 CFR 63 Subpart OOOO-"National Emission Standards for Hazardous Air Pollutants: Printing, Coating and Dyeing of Fabrics and Other Textiles" and Subpart SSSS-"National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil". See "Compliance with Applicable Federal Rules" for further discussion.

CHAPTER ENV-A 600 –Statewide Permit System

The initial State Permit to Operate # FP-S-0060, was issued August 4, 1998 for two #6 oil-fired boilers and expired August 31, 2003. WMI filed a late permit renewal application on December 22, 2003. On July 5, 2005, FP-S-0060 was renewed with an expiration date of July 31, 2010. Temporary permit #TP-BP-0699, was issued on September 16, 2005 for a fabric coating process and expired on March 31, 2007. WMI filed a late renewal application for TP-BP-0699. During this time, WMI reported actual toluene emissions from the coating operations above the 10 tpy major source threshold for a single HAP, making WMI subject to MACT, NSPS and Title V. WMI is now exhausting the HAP/VOC emissions from the fabric and metal coil coating operations through the two boilers for destruction. A temporary permit was required to authorize the metal coil coating operations, incorporate changes to the boilers, and add the applicable MACT and NSPS regulatory conditions. Therefore, Temporary permit #TP-0001 (the Permit) was issued December 22, 2008 and expired June 30, 2010.

A second Temporary Permit (#TP-0057) was issued October 1, 2010 to authorize construction of a supplemental environmental project (SEP) to route the HAP/VOC emissions from EU05, EU06, EU11 and EU12 to the boilers for destruction. The second temporary permit also covered the modifications to EU02. The SEP was a condition of a Consent Decree asserted to by WMI and granted as an order by the Hillsborough County Superior Court, DES v. Warwick Mills, Inc., docket no. 09-E-0336, on November 10, 2009. The temporary permit expires April 30, 2012.

Table 3 is a summary of the reported emissions by WMI for this inspection period.

Table 3 – Facility Total Emissions (tpy)

	PT	SO_2	NOx	CO	VOCs	TOTAL (tons)
Emission Limit					<50	
2010	1.13	16.37	2.89	0.27	1.26	23.20
2009	1.23	17.86	3.15	0.29	1.15	23.89

Part ENV-A 606 – Air Dispersion Modeling Impact Analysis

Air dispersion modeling has been conducted on three separate occasions. In July 1999, the criteria pollutant emissions for the two boilers were modeled, resulting in modeled exceedances of the one-hour and three-hour SO_2 NAAQS. Based on this modeling, WMI agreed to a fuel use permit limit of 610 gallons per consecutive 24-hour period and 144,450 gallons per year of #6 fuel oil. On June 30, 2005, toluene and tetra hydro furan (THF) emissions were modeled, and no modeled exceedances of the AALs were indicated. RTAP emissions were modeled again on June 10, 2008. These emissions were based on the maximum use rates from 2006/2007 (calculated based on the highest one day use rate reported and scaled up to 8760 hours/year for potential) and assuming the process coater emissions were controlled at 98%. Compliance with Env-A 1400 was demonstrated at that time.

VII. Compliance with Permit Fee System

CHAPTER ENV-A 700 – Permit Fee System

Emission-based fees are due by April 15 of the year following the emission year.
WMI submitted timely payment of its emission-based fees for calendar years 2009-2010.

VIII. Source Testing and Monitoring

CHAPTER Env-A 800 – Testing and Monitoring Procedures

WMI has demonstrated compliance with the Monitoring and Testing Requirements listed in Table 4 of TP-0057 except for the following:

- ***WMI failed to demonstrate that the capture efficiency of the Permanent Total Enclosure (PTE) is 100% for EU02 after the coater was relocated to an adjacent room per Table 3, Item 15. b.), 2.)ii.) of TP-0057.***

IX. Compliance with Recordkeeping and Reporting

CHAPTER Env-A 900 – Compliance with Recordkeeping and Reporting

Part Env-A 902-Availability of Records

WMI demonstrated that it is keeping records for the minimum of 5 years.

Env-A 903.02-General Recordkeeping Requirements for Process Operations

WMI demonstrated via electronic records that it is keeping the required records on a monthly basis for the raw material used by the coating processes.

Part Env-A 904-VOC Emission Statements Recordkeeping Requirements

WMI has demonstrated compliance with the requirements in Table 5, items 6, 7, 8 and 9 of the Permit. The records are kept via logbooks, files and computerized spreadsheets.

Part Env-A 906-Additional Recordkeeping Requirements

WMI demonstrated that it is keeping the required records for a 12-month running total of facility wide emissions of VOCs. Pressure readings, temperatures and leak checks are recorded via logbooks and electronically.

Part Env-A 907.01-General Reporting Requirements

The FCE Records Review is included in Appendix A to this report. The appendix lists all the reports that were received and reviewed in order to complete this compliance evaluation. The records review attachment includes a determination of each report's timeliness with regard to the required submittal date, and if the report was acceptable in terms of its content. Based on a review of the documents submitted by WMI, it has been determined that WMI is in compliance with this section with the following exceptions:

- ***The 2010 Title V Semi-Annual Permit Deviation and Monitoring Report and Annual Compliance Certification had numerous omissions and erroneous entries. A list of these discrepancies was given to WMI during the inspection***
- ***WMI has not been including a description of the changes to the CPMS, web coating operation or the emission capture system in the Semi-Annual reports as required by Table 6, Item 5) h.5) of TP-0057. Changes such as the additional flow measuring devices for the downdraft tables, the changes associated with Coater #2 and the movement of Coater #2 are required to be noted in the Semi-Annual reports required by Table 6, Item 5) h.5) of TP-0057 and the federal MACT standards.***

Part Env-A 908-VOC Emission Statements Reporting Requirements

WMI is not required to submit these statements as total VOC emissions are less than 10 tons per year for years 2009 and 2010.

X. Compliance with RACT

CHAPTER ENV-A 1200–Prevention, Abatement, and Control of Stationary Source Air Pollution

CHAPTER ENV-A 1200 – Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT)

Effective June 1, 2011, requirements in Env-A 1204 were superseded by Env-A 1200.

Part Env-A 1204 – Stationary Sources of Volatile Organic Compounds (VOC)

WMI has the potential to emit greater than 10 tons of VOCs in a consecutive 12-month period as defined in Env-A 1204.10 (a) and 1204.14 (a) and is therefore subject to the compliance options. WMI has chosen to comply with these requirements by implementing add-on control techniques and complying with the minimum destruction efficiency as stated in Table 3, Item 15. b.) 2.) i.) of TP-0057 and 40 CFR 63.4291(a). The control technique consists of exhausting the HAP/VOC laden emissions from the fabric and metal coil coating operations through the two boilers for destruction. WMI has demonstrated compliance by the addition of the ductwork and controls to the boilers and compliance with the calculated emission rate.

Part Env-A 1211-Nitrogen Oxides (NOx)

This part is not applicable as WMI's maximum potential NOx emissions are less than 50 tpy.

CHAPTER Env-A 1300 – Nitrogen Oxides (NOx) Reasonably Available Control Technology (RACT)

Effective October 31, 2010, requirements in Env-A 1211 were superseded by Env-A 1300.

XI. Compliance with Toxics Regulations

CHAPTER ENV-A 1400 – Regulated Toxic Air Pollutants

Compliance was demonstrated at the time of the Permit application (March 2010). WMI must update the compliance demonstration if there is a revision to the list of RTAPs lowering the AAL for any RTAP emitted at the facility; the amount of any RTAP emitted is greater than the amount that was evaluated in the Application Review Summary (e.g., use of a coating will increase); an RTAP that was not evaluated in the Application Review Summary will be emitted (e.g., a new coating will be used); or if emissions from EU01 and/or EU02 are not vented through EU09 and/or EU10 for destruction, or if the destruction efficiency decreases to less than 98%, or if the destruction efficiency of EU09 and/or EU10 falls below 95% only when emissions are vented from EU05, EU06, EU11 and/or EU12. ***WMI has not updated its Env-A 1400 compliance demonstration to the February 2011 revision of Env-A 1400 within the 90 days as required by Table 3, Item 3 of TP-0057. At the time of the inspection, WMI was operating the downdraft tables only and the boiler temperatures were observed to be: Boiler #1= 380 degF and Boiler #2=525 degF. WMI has not demonstrated a minimum destruction efficiency of 95% at these temperatures and therefore must perform an Env-A 1400 demonstration for this and any other time the boilers were operating below the temperatures tested in the June 2010 test as required by Table 3, Item 1.e.) of TP-0057.***

XII. Compliance with other Miscellaneous Provisions

Part Env-A 1604.01 - Maximum Sulfur Content Allowable in Liquid Fuels

WMI has demonstrated compliance by retaining fuel delivery tickets showing the sulfur content of the fuel delivered has not exceeded 2.0 percent sulfur by weight.

Part Env-A 2002.02 – Visual Emission Standards for Fuel Burning Devices Installed After May 13, 1970

WMI is compliant with the visual (≤20%) emission standards. Opacity of approximately 5% was observed from the combustion devices during the inspection.

Part Env-A 2002.06 – Particulate Emission Standards for Fuel Burning Devices Installed After May 13, 1970

The particulate matter emissions from fuel burning devices installed after May 13, 1970 shall not exceed 0.60 lb/MMBtu. This rate can only be verified via stack testing. To date, no stack testing to measure particulates has been required.

XIII. Compliance with Applicable Federal Rules

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Not Applicable – WMI has boilers that are below the minimum size threshold.

40 CFR 60 Subpart TT – Standards of Performance for Metal Coil Surface Coating

This subpart requires a minimum of 90 percent reduction of VOC emissions through the control device. WMI demonstrated compliance with a stack test in June of 2010. Results showed a minimum of 98.0 percent reduction in VOC emissions.

40 CFR 60 Subpart VVV - Standards of Performance for Polymeric Coating of Supporting Substrates Facilities

WMI has demonstrated compliance by supplying the VOC usage records in the Annual Emission Statement and by supplying the projected 6-month VOC usage with the Semi-Annual Compliance Report.

40 CFR 61 – National Emission Standards for Hazardous Air Pollutants

Not Applicable – There are no applicable standards for the processes at WMI.

40 CFR 63 Subpart OOOO-National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles

This subpart requires a minimum of 98 percent reduction of VOC/HAP emissions through the control device and assurance that the capture efficiency of the Permanent Total Enclosure (PTE) is 100 percent. WMI demonstrated compliance by conducting a stack test in June of 2010. Results showed a minimum of 98 percent reduction in VOC/HAP emissions and a capture efficiency for the PTE of 100 percent. WMI also certified in the Title V Annual Compliance Certification that all operations are in accordance with the Work Practice Plan and all startups, shutdowns and malfunctions are in accordance with the Startup, Shutdown and Malfunction Plan.

During the inspection, DES requested that WMI provide a Continuous Parameter Monitoring System (CPMS) Quality Control Program. WMI provided "DC 410-093-005 Coater 1 & 2 CPMS/SSMP Operating Procedure" dated May 4, 2011.

DES has determined that the CPMS does not meet the requirements as stated in Table 3, Item 21 of TP-0057. This plan does not address the additional monitoring equipment for the downdraft tables, spare parts inventory, calculations, sampling, analysis methods and other data as required by Table 3, Item 21 of TP-0057 and 40 CFR 63.8(d).

40 CFR 63 Subpart SSSS-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

The same conditions apply to coating metal coil as described in Subpart OOOO above. WMI has demonstrated compliance.

XIV. Enforcement History and Status

DES issued a Notice of Past Violation on December 14, 2010 for incomplete reporting issues.

XV. Conclusions and Recommended Actions

This on-site inspection and complete records review conducted by DES indicate the following deficiencies:

1. WMI failed to demonstrate that the capture efficiency of the PTE is 100% for EU02 after the coater was modified and relocated to an adjacent room per Table 3, Item 15. b.), 2.)ii.) of TP-0057.

2. The 2010 Semi-Annual Permit Deviation and Monitoring Report and Annual Compliance Certification had numerous omissions and erroneous entries. A list of these discrepancies was given to WMI during the inspection,

3. WMI has not included descriptions of changes to the CPMS, web coating operation or the emission capture system in the Semi-Annual reports as required by Table 6, Item 5) h.5) of TP-0057. Changes such as the additional flow measuring devices for the downdraft tables, the changes associated with EU02 and the movement of EU02 are required to be noted in the Semi-Annual reports required by Table 6, Item 5) h.5) of TP-0057 and the federal MACT standards.

4. WMI has not updated its Env-A 1400 compliance demonstration to the February 2011 revision of Table Env-A 1450-1 within the 90 days as required by Table 3, Item 3 of the Permit. At the time of the inspection, WMI was operating the downdraft tables only and the boiler temperatures were observed to be: Boiler #1= 380 degF and Boiler #2=525 degF. WMI has not demonstrated a minimum destruction efficiency of 95% at these temperatures and therefore must perform an Env-A 1400 compliance demonstration for this and any other time the boilers were operating below the temperatures recorded during the compliance testing of June 2010 as required by Table 3, Item 1.e.) of TP-0057.

5. WMI provided DES with a CPMS Quality Control Program dated May 4, 2011. DES has determined that this plan does not meet the requirements as stated in Table 3, Item 21 of TP-0057. Specifically, this plan does not address the additional monitoring equipment for the downdraft tables, spare parts inventory, calculations, sampling, analysis methods and other data as required by Table 3, Item 21 of TP-0057 and 40 CFR 63.8(d).

In order for WMI to return to compliance:

1. WMI shall coordinate with DES and demonstrate 100% capture and control of the PTE for EU02.

2. WMI shall revise and resubmit the 2010 Annual Compliance Certification and both the 2010 Semi-annual reports correcting the deficiencies noted in Items 2 and 3 above.

3. WMI shall provide DES with an updated Env-A 1400 compliance demonstration using the February 2011 revision of Env-A 1400. WMI shall also provide to DES an Env-A 1400 demonstration for May 26, 2011 when the downdraft tables were operating and the boilers were operating at temperatures below those recorded during compliance testing in June 2010. WMI shall also provide DES an Env-A 1400 compliance demonstration for all other times since October 1, 2010 when the downdraft tables were operating with the boiler temperatures below those recorded during the June 2010 compliance test.

4. WMI shall revise the CPMS Quality Control Program to address all the requirements in Table 3, Item 21 and 40 CFR 63.8(d.) and provide DES with a copy.

5. WMI shall provide to DES a revised copy of the Capture System Monitoring Plan as described in Table 4, Item 12 of TP-0057.

Appendix A: Full Compliance Evaluation Records Review

Facility: Warwick Mills
Date of FCE: May 26, 2011
Reviewer: Greg Helve

Annual Emission Reports (incl. NOx, VOC etc.):

Reporting Period	When Rec'd	Report OK	In Database
2010	4/15/2011	Yes	Yes
2009	4/15/2010	Yes	Yes

Annual Emissions-Based Fee Payments:

Reporting Period	When Rec'd	In Database
2010	4/15/2011	Yes, in DES Emission Section's Spreadsheet
2009	4/15/2010	Yes, in DES Emission Section's Spreadsheet

TV Annual Compliance Certifications:

Reporting Period	When Rec'd	Report OK	In Database
2010	4/15/2011	No	Yes
2009	4/15/2010	No	Yes

TV Semi-Annual Permit Deviation and Monitoring Reports:

Reporting Period	When Rec'd	Report OK	In Database
2010 2nd	1/31/2011	No	Yes
2010 1st	7/29/2010	No	Yes
2009 2nd	2/01/2010	No	Yes
2009 1st	7/30/2009	No	Yes

Individual Permit Deviations Reports:

Malfunction date	When Rec'd	Report OK	In Database
4/24/2009	5/04/2009	Yes	Yes
9/21/2010	9/30/2009	Yes	Yes
12/16/2010	12/22/2010	Yes	Yes

Quarterly Continuous Emission Monitoring Excess Emission Reports (CEM EERs):

Reporting Period	When Rec'd	Report OK	In Database
2011 1st	4/29/2011	No	Yes
2010 4th	1/31/2011	No	Yes
2010 3rd	10/29/2010	No	Yes
2010 2nd	7/29/2010	No	Yes
2010 1st	Report missing from files		
2009 4th	Report missing from files		
2009 3rd	12/18/2009	***Late***	Yes
2009 2nd	12/18/2009	***Late***	Yes
2009 1st	12/18/2009	***Late***	Yes

CEM Audits (OPAs, CGAs, RAAs, RATAs):

Reporting Period	Report Type	When Rec'd	Report OK	In Database
N/R				

Stack Tests:

Stack Test Date	Device Tested	When Rec'd	Report OK	In Database
6/09/2010	Boilers as control	08/11/2010,	No	Yes
		2/11/2011 Rev 1	Yes	Yes