



Company Name:	Johns Manville Spartanburg Plant	Permit Writer:	Kirk G. Schneider
Agency Air Number:	2060-0344	Date:	DRAFT
Permit Number:	TV-2060-0344 v2.0		

DATE APPLICATION RECEIVED: March 20, 2025

DATE OF LAST INSPECTION:

The last comprehensive inspection took place on November 6, 2023. No violations of permit conditions or applicable regulations were observed during the inspection.

PROJECT DESCRIPTION

Title V Operating Permit Renewal

FACILITY DESCRIPTION

Spunbond mat manufacturer
SIC CODE: 2297 (Non-Woven Fabrics)
NAICS CODE: 313230 (Nonwoven Fabric Mills)

OPERATING PERMIT STATUS

This facility is required to have a Title V permit because it has individual HAP emissions greater than 10 tpy and its uncontrolled combined (total) HAP emissions are greater than 25 tpy.

SINGLE SOURCE DETERMINATION

Per a July 3, 2003 letter to this facility, the Department determined that Johns Manville and Teijin Monofilament (2060-0380) (Now an exempt facility) should be treated as separate and individual sources. The Department also determined Johns Manville is not co-located for Title V purposes with Auriga Polymers, Inc. (2060-0345) or Hagner Future Films (2060-0376) (Closed). In a letter dated June 3, 2003, to the Department, the EPA concurred with this decision.

CHANGES SINCE LAST OP ISSUANCE

No changes

EMISSIONS

FACILITY WIDE EMISSIONS			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
PM	44.60	--	44.60
PM ₁₀	37.85	--	37.85
PM _{2.5}	37.85	--	37.85
SO ₂	0.051	--	0.051
NO _x	8.52	--	8.52



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FACILITY WIDE EMISSIONS			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
CO	7.09	--	7.09
VOC	98.59	--	98.59
Lead (Pb)	4.10E-05	--	4.10E-05
Formaldehyde (Highest HAP)	50.38	--	50.38
Total HAP	65.08	--	65.08

SOURCE TEST REQUIREMENTS

No performance testing is required. 40CFR63 Subpart JJJJ only requires that a performance test be conducted if a control device is used to comply with the organic HAP limit and this facility does not have a control device.

SPECIAL CONDITIONS, MONITORING, LIMITS

Based on operational process knowledge and historical weekly monitoring records showing no deviations, it was determined that monthly visual observations will ensure compliance with opacity limits.

REGULATIONS

Not Applicable - Section II(E) (Synthetic Minor)

No synthetic minor limits needed.

Not Applicable - Standard No. 1 (Emissions from Fuel Burning Operations)

This facility does not have any sources that meet the definition of a fuel burning operation as specified by SC Regulation 61.62.1. The Spunbond Line No.5 does have natural gas fired dryers but these units are direct heat systems in which the products of combustion come into contact with the material being heated.

Not Applicable - Standard No. 3 (state only) (Waste Combustion and Reduction)

This facility does not combust any waste

Applicable - Standard No. 4 (Emissions from Process Industries)

PM limits for this facility's processes are not specified elsewhere and so Section VIII is applicable. This facility previously determined it would have 4 processes consisting of Spunbond Line No. 3, Spunbond Line No. 4, Spunbond Line No. 5 and the Silo System. These have not changed:



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Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
Spunbond Line No. 3	Confidential	5.49	1.73	No Control	Not required Uncontrolled emissions are less than PM Allowable
Spunbond Line No. 4	Confidential	5.65	1.73	No Control	Not required Uncontrolled emissions are less than PM Allowable
Spunbond Line No. 5	Confidential	5.57	1.73	No Control	Not required Uncontrolled emissions are less than PM Allowable
Silo System	Confidential	2.21 (per silo)	0.29 (per silo)	No Control	Not required Uncontrolled emissions are less than PM Allowable

Visible emissions limits for all of this facility's equipment are not specified elsewhere and so each piece of equipment was assigned the appropriate opacity limit as specified by Section IX based on their installation dates.

All other sections of this regulation do not apply because they apply to types of equipment that this facility does not have. This facility also does not have any non-enclosed operations.

Not Applicable - Standard No. 5 (Volatile Organic Compounds)

This regulation applies to specific processes. This facility does not have any of the processes specified in this regulation.

Not Applicable - Standard No. 5.2 (Control of Oxides of Nitrogen (NO_x))

This facility has the following sources that burn a fuel and emit NO_x:

(1) Spunbond Line No. 5 Drum Dryer No.1 and Spunbond Line No. 5 Drum Dryer No. 2 - These sources were constructed prior to 2004, have NO_x emissions that have not undergone a BACT review, do not qualify for any of the exemptions specified by Section I(B) and each is classified as an existing source as specified by Section I(A)(2). Section IV(A) states that existing sources are not subject to Standard 5.2 until their burner assemblies are replaced. None of the burner assemblies have been replaced.

Not Applicable - Standard No. 7 (Prevention of Significant Deterioration)

This facility is not specified as one of the 28 specific industry types for PSD applicability (SIC Code 2297) and is in the other category which specifies a PSD applicability trigger of 250 tpy. This facility emits PM, PM_{2.5}, PM₁₀, SO₂, CO, NO_x and VOC which are PSD pollutants. Uncontrolled facility-wide emissions of these pollutants are each less than 250 tpy.



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Applicable - 61-62.6 (Control of Fugitive Particulate Matter)

This facility is required to comply with the applicable requirements of this regulation.

40CFR60 and 61-62.60 (New Source Performance Standards (NSPS))

Not Applicable – NSPS Subpart Ka

40CFR60 Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984) was reviewed for applicability because this facility has the following storage tanks that were constructed during this time period consisting of F00301S, F00302S, F00601S, F00602S and F005. These storage tanks have not been modified but do not meet the size requirement and do not store any petroleum liquids.

Not Applicable – NSPS Subpart Kb

40CFR60 Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984, and On or Before October 4, 2023) because this facility has the following storage tanks that were constructed during this time period consisting of F00303S, F00304S, F00603S, F00604S, F00605S and F00606S. These storage tanks do not store any volatile organic liquids.

Not Applicable – NSPS Subpart DDD

Subpart DDD (Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry) was reviewed for applicability. This subpart applies to the manufacture of the polymers listed in 60.560(a) and this facility does not manufacture any of those polymers.

Not Applicable – NSPS Subpart HHH

Subpart HHH (Standards of Performance for Synthetic Fiber Production Facilities) was reviewed for applicability. 60.600(a) (Applicability and Designation of Affected Facility) states that this subpart applies to each solvent-spun synthetic fiber process that produces more than 500 Mg (551 ton) of fiber per year. This facility does not use solvent spun processes.

Not Applicable - 40 CFR 61 and 61-62.61 (National Emission Standards for Hazardous Air Pollutants (NESHAP))

This facility does not have any sources that meet any of the applicability requirements of all the subparts contained in this regulation.

40 CFR 63 and 61-62.63 (National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories)

Applicable - 40CFR63 and 61-62.63 MACT Major Source

This facility has uncontrolled individual HAP emissions greater than 10 tpy and its uncontrolled combined (total) HAP emissions are greater than 25 tpy and so is classified as a major source for MACT.

Applicable – MACT Major/Area Source Subpart A

Because this facility has equipment subject to Subpart JJJJ, that equipment is also subject to 40CFR63 Subpart A (General Provisions).



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Applicable - MACT Major Source Subpart JJJJ

Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating) was reviewed for applicability. Each Spunbond Line meets the definition of a web coating line as specified in 63.3310 and so this subpart applies as specified by 63.3290. As specified by 63.3300 the affected source is the collection of all web coating lines which is Spunbond Line No. 3, Spunbond Line No. 4 and Spunbond No .5. The Spunbond Lines are classified as an existing affected source as specified by 63.3310 because they were all constructed before September 13, 2000. As specified by 63.3330(a) and 63.3320(a), this affected source had to be in compliance with the applicable requirements by July 9, 2021.

Not Applicable - 61-62.68 (Chemical Accident Prevention Provisions)

This facility does not store any chemicals specified by this regulation above the threshold quantities required to trigger applicability to this regulation.

Not Applicable - 40 CFR 64 (Compliance Assurance Monitoring)

CAM applies to each PSEU when it is located at major source that is required to obtain Title V permit. This facility is classified as a major source for HAP but does not use any control devices to control HAP emissions.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 (Ambient Air Quality Standards)

This facility has demonstrated compliance with this standard by using air dispersion modeling. See modeling summary dated January 3, 2025. No changes have been made since the issue of the last Title V permit that would require this standard to be updated.

Applicable - Standard No. 8 (state only) (Toxic Air Pollutants)

This facility has demonstrated compliance with this standard by using air dispersion modeling. See modeling summary dated January 3, 2025. No changes have been made since the issue of the last Title V permit that would require this standard to be updated.

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.70.7(h).

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.