

Facility Name: **Lasco Bathware**

City: Cordele

County: Crisp

AIRS #: 04-13-08100019

Application #: 11432

Date SIP Application Received: April 30, 1999

Date Title V Application Received: May 11, 1999

Permit No: 3088-081-0019-V-01-1

Program	Review Engineers	Review Managers
SSPP	Eric Cornwell	Terry Johnson
SSCP	n/a	n/a
ISMP	Mark McDonald	Richard Taylor
TOXICS	Mike Fortune	Neeraj Verma

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3088-081-0019-V-01-0	10/28/98		x

B. Regulatory Status

1. PSD/NSR

This source is PSD major because potential VOC emissions exceed 250 tons per year.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	x			x
PM ₁₀	x			x
SO ₂				
VOC	x	x		
NO _x	x			x
CO				
TRS				
H ₂ S				
Individual HAP	x	x		
Total HAPs	x	x		

II. Proposed Modification

A. Description of Modification

Lasco has proposed to modify Condition 4.2.1. This Condition currently requires that Lasco perform styrene emissions testing from the spray booths in order to determine an emission factor for the process. The original requirement came about because Lasco wanted to use styrene emission factors other than those provided by EPA. In application 11432, Lasco proposes to forgo emissions testing and use the EPA FRP styrene model emission factors. The high cost of testing is the reason stated by Lasco for this proposal. Condition 4.2.1 is the only Condition affected by this request. I see no reasons for not modifying the permit to allow the use of EPA emission factors and eliminate the testing requirement. Condition 4.2.1 will be removed.

EPD-approved emission factors will now come from the FRP emission model. Baseline emission factors are: gelcoat: 54.8% and spray resin layup: 18.9%

This change meets the definition of a "minor modification." Emissions are not increasing, there is no case-by-case determination of emission limits, and there are no changes to monitoring, reporting, or recordkeeping.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
PM	X	0		
PM ₁₀	X	0		
SO ₂				
VOC	X	0		
NO _x	X	0		
CO				
TRS				
H ₂ S				
Individual HAP	X	0		
Total HAPs	X	0		

C. PSD/NSR Applicability

Since emissions are not affected, PSD is not triggered.

III. Facility Wide Requirements

A. Emission and Operating Caps

There are no new caps, rules, or regulations associated with this minor modification.

B. Applicable Rules and Regulations

There are no new caps, rules, or regulations associated with this minor modification.

C. Compliance Status

Lasco has exceeded the deadline to test that was required under Condition 4.2.1. Testing was required within 180 days after date of Title V permit (10/28/98). This deadline would have expired ~ 4/28/99.

D. Operational Flexibility

The Company has not proposed any operational flexibility in this application.

E. Permit Conditions

There are no new permit Conditions; Condition 4.2.1 will be removed from the permit.

IV. Regulated Equipment Requirements

A. Brief Process Description

This has not changed since the initial Title V Permit issuance.

B. Equipment List for the Process

This has not changed since the initial Title V Permit issuance.

C. Equipment & Rule Applicability

There are no new limits, Rules or regulations.

D. Compliance Status

The Company did not perform the tests, or request that testing be eliminated within 180 days after permit issuance.

E. Operational Flexibility

Lasco has not proposed any operational flexibility in this application.

F. Permit Conditions

There are no new permit Conditions.

V. Testing Requirements (with Associated Record Keeping and Reporting)

- A. Lasco has proposed to eliminate Condition 4.2.1 which required styrene emissions testing in order to determine an emission factor. Lasco and EPD had originally agreed to a test because Lasco officials thought that the emission factors provided by EPA were biased high. Lasco now asks that, due to the high cost of testing, that they be allowed to use the EPA factors instead of performing the test.

Condition 4.2.1 removed from the permit. No other modifications.

- B. Condition 4.2.1 would affect the spray booths emissions calculations.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

- A. No change in monitoring
- B. No change in monitoring

VI. Other Record Keeping and Reporting Requirements

No changes to report.

VII. Specific Requirements

A. Operational Flexibility

Not applicable

B. Alternative Requirements

Not applicable

C. Insignificant Activities

No changes to report

D. Temporary Sources

Not applicable

E. Short-Term Activities

Not applicable

F. Compliance Schedule/Progress Reports

No changes to report

G. Emissions Trading

None applicable

H. Acid Rain Requirements

Not applicable

I. Prevention of Accidental Releases

Not applicable

J. Stratospheric Ozone Protection Requirements

No changes to report

K. Pollution Prevention

Not applicable

L. Specific Conditions

None applicable

No. 3088-
081-0019-V-

Closing Block: We have reviewed and recommend issuance of draft/proposed Permit 01-1

Program	Review Engineers	Dates	Review Managers	Dates
SSPP				
SSCP				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date