

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Lasco Bathware, Inc.**

City: Cordele

County: Crisp

AIRS #: 04-13-081-00019

Application #: 17073

Date SIP Application Received: November 17, 2006

Date Title V Application Received: November 17, 2006

Permit No: 17073

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced 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 proposed 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 EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3088-081-0019-V-02-0	July 8, 2004	✓	
3088-081-0019-V-02-2	April 20, 2006	✓	
3088-081-0019-V-02-3	November 21, 2006	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3088-081-0019-V-02-0	Title V Renewal; includes 40 CFR 63 Subpart WWWW
3088-081-0019-V-02-2	Significant modification for the installation and operation of a concentrator and thermal oxidizer to control VOC and HAP emissions
3088-081-0019-V-02-3	Modification in performance test deadline on the concentrator and oxidizer

B. Regulatory Status

1. PSD/NSR/RACT

Lasco Bathware is considered a major source under PSD regulations because potential VOC emissions exceed 250 tpy. The facility has never undergone PSD permitting because the majority of the plant was constructed prior to 1975 and therefore is “grandfathered” from PSD review. All expansions and increases in emissions have been accomplished through PSD-avoidance measures.

Nonattainment NSR does not apply because the facility is located in an attainment area.

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	✓			✓
PM ₁₀	✓			✓
SO ₂	n/a			

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
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

Condition 3.5.1 of Permit Amendment No. 3088-081-0019-V-02-2 requires the facility to replace the concentrator bed material within 120 days after any performance test that indicates that the overall VOC control efficiency of the concentrator and oxidizer is less than 86%. The facility requests that the condition be modified to allow the facility to make necessary repairs and allow for retests if the cause of the low efficiency was determined to be a result of conditions other than the concentrator bed performance. Condition 4.2.3 has also been modified to reflect these changes. Condition 4.2.2 has been modified to account for the fact that the materials listed would only need to be monitored and recorded if they are used in the area which is controlled by the air pollution control system.

B. Emissions Change

This modification will not affect emissions from the facility.

C. PSD/NSR Applicability

This modification does not trigger PSD review.

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

- A. Individual Equipment: Conditions 3.5.1 and 4.2.3 have been modified to allow the facility to make necessary repairs and allow for retests if the cause of the low efficiency was determined to be a result of conditions other than the concentrator bed performance. Condition 4.2.2 has been modified to account for the fact that the materials listed would only need to be monitored and records if they are used in the area which is controlled by the air pollution control system.
- B. Equipment Groups (all subject to the same test requirements): None applicable.

VII. Specific Requirements

- A. Operational Flexibility
No changes.
- B. Alternative Requirements
No changes.
- C. Insignificant Activities
No changes.
- D. Temporary Sources
No changes.
- E. Short-Term Activities
No changes.
- F. Compliance Schedule/Progress Reports
No changes.
- G. Emissions Trading
No changes.
- H. Acid Rain Requirements
No changes.
- I. Prevention of Accidental Releases
No changes.
- J. Stratospheric Ozone Protection Requirements
No changes.
- K. Pollution Prevention
No changes.
- L. Specific Conditions
No changes.

Addendum to Narrative

The 45-day EPA review started on October 9, 2007 and ended on November 23, 2007. Comments were not received by the Division.