

Facility Name: **Atlanta Marble Manufacturing, Inc.**
 City: Decatur
 County: DeKalb
 AIRS #: 04-13-089-00317

Application #: TV-13749
 Date Application Received: April 25, 2002
 Date Application Deemed Administratively Complete: September 16, 2002
 Date of Draft Permit: August 21, 2003
 Permit No: 3089-089-0317-V-01-0

Program	Review Engineers	Review Managers
SSPP	Edu Enin-Okut	Matthew Page
SSCP	n/a	n/a
ISMP	Sid Stephens	Richard Taylor
Toxics	n/a	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Atlanta Marble Mfg., Inc. and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It 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. Facility Identification**

1. Facility Name: Atlanta Marble Manufacturing, Inc.
2. Parent/Holding Company Name: Atlanta Marble Manufacturing, Inc.
3. Previous and/or Other Name(s): None.
4. Facility Location:

224 Rio Circle
Decatur, Georgia 30030
DeKalb County
5. Attainment or Non-attainment Area Location:

This facility is located in the Atlanta ozone non-attainment area.
6. Class I Area Impacts:

The facility is not located within 100 km of a Class I Area.

B. Site Determination

There are no site determination issues. No other facilities could possibly be contiguous or adjacent and under common control.

C. Existing Permits**Table 1: List of Current Permits as Amended**

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
3088-089-0321-S-01-0	July 14, 2003	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3088-089-0321-S-01-0	Issued to International Bath Corp. Facility bought by Atlanta Marble Mfg, Inc. All equipment moved to Atlanta Marble Mfg; and, said equipment was included in its Title V application.

D. Process Description

1. SIC Codes(s): 3089

2. Description of Product(s)

The facility manufactures marble-cast countertops, sinks and fiberglass tubs.

3. Overall Facility Process Description

Cast Marble Operations

Open molds are cleaned and waxed in mold preparation area. The molds are then sprayed with a clear gel coat in either gel coat booth #1 or #2 (GB01 and GB02, respectively) in order to provide a hard gloss finish to the marble product. Arrestor pads (AP01 and AP02) control styrene emissions from coating processes in the gel coat booths. The molds are allowed to cure in either a heated cure tunnel or an open-air cure.

After the mold has cured and hardened, a matrix of catalyzed casting resin and marble dust are poured into the molds in the marble cast area or the marble pour area (MC01 or MP01, respectively). The full molds are placed on cure racks.

After completing the curing process, marble parts are removed from the molds and moved to the grind and final finish areas where they are trimmed, buffed, and polished.

Tub Division

Vacuum formed tub shells are shaped in a forming machine and sent to the chopper gun spray areas (CG01 and CG02). To provide reinforcement, fiberglass chop strand and catalyzed polyester resins are sprayed onto the underside of the tub shells. Particulate emissions from this process are filtered out using filter banks (FB01 and FB02).

In the laminate area, the fiberglass laminate is rolled out to eliminate air pockets and placed on cure racks to harden into a finished product. After curing, the tubs' rough edges are removed in the grind booth. Plumbing is then installed and the finished product is packaged and shipped.

4. Overall Process Flow Diagram (optional)

Process flow diagrams were submitted as attachments to the Title V application.

E. Regulatory Status

1. PSD/NSR

The facility is potentially major under NSR regulations with a potential to emit volatile organic compounds (VOC) greater than 50 tons/yr (tpy) in a serious ozone non-attainment area. The facility will avoid NSR review if they maintain VOC emissions below 50 tons/yr. Actual facility VOC emissions in 2001 were 12 tons/yr.

Are VOC Potential Emissions > 50 tons/yr? Yes.

Are NO_x Potential Emissions > 50 tons/yr? No.

Note: Because the facility is located in the Atlanta non-attainment area and emits greater than 25 tpy of VOC, it will be subject to “reasonably available control technology” (RACT) requirements to control its VOC emissions (Georgia Rule 391-3-1-.02(2)(tt)).

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

3. MACT Standards

The facility is subject to the MACT, 40 CFR Part 63 Subpart WWWW, “Reinforced Plastic Composites Production”, promulgated on April 21, 2003. Atlanta Marble Mfg. is an “existing source” with respect to the rule due to its construction prior to August 2, 2001, the proposal date Subpart WWWW. The rule has a compliance date of April 21, 2006. Also, the case-by-case MACT determination described by Section 112(g) of the Clean Air Act was not required for this facility because it was constructed prior to this section’s trigger date of June 29, 1999. Modifications made to the facility in 2001 (i.e., the addition of two chopper guns) did not elicit Section 112(g) review.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No

Program Code	Applicable (y/n)
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Condition 2.1.1 establishes a 49-ton per year plant-wide cap on VOC emissions in order to avoid NSR review.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

Atlanta Marble has not indicated any noncompliance situations. However, the SSCP indicated that the facility: (1) failed to apply for and obtain the required air quality permits to construct and operate, (2) did not submit a Title V application within 12 months of becoming a major source, and (3) has not paid Permit Fees for calendar year 2000. Currently, the facility is under a consent order (Consent Order No. EPD-AQC-3243). A requirement to comply with the Consent Order is included in this permit.

D. Operational Flexibility

Atlanta Marble has not requested any operational flexibility.

E. Permit Conditions

2.1.1 Limits VOC from the facility to less than 49 tons during any 12 consecutive months to avoid NSR review.

III. Regulated Equipment Requirements

A. Brief Process Description

Cast Marble Operations

Open molds are cleaned and waxed in mold preparation area. The molds are then sprayed with a clear gel coat in either gel coat booth #1 or 2 (GB01 and GB02, respectively) in order to provide a hard gloss finish to the marble product. Arrestor pads (AP01 and AP02) control styrene emissions from coating processes in the gel coat booths. The molds are allowed to cure in either a heated cur tunnel or an open-air cure.

After the mold has cured and hardened, a matrix of catalyzed casting resin and marble dust are poured into the molds in the marble cast area or the marble pour area (MC01 or MP01, respectively). The full molds are placed on cure racks.

After completing the curing process, marble parts are removed from the molds and moved to the grind and final finish areas where they are trimmed, buffed, and polished.

Tub Division

Vacuum formed tub shells are shaped in a forming machine and sent to the chopper gun spray areas (CG01 and CG02). To provide reinforcement, fiberglass chop strand and catalyzed polyester resins are sprayed onto the underside of the tub shells. Particulate emissions from this process are filtered out using filter banks (FB01 and FB02).

In the laminate area, the fiberglass laminate is rolled out to eliminate air pockets and placed on cure racks to harden into a finished product. After curing, the tubs' rough edges are removed in the grind booth. Plumbing is then installed and the finished product is packaged and shipped.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CG01	Chopper Gun #1 <i>Fabricated spray booth with Venus/Magnum chopper gun.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 5.2.1, 5.2.2, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	FB01	Filter Bank #1
CG02	Chopper Gun #2 <i>Fabricated spray booth with Venus/Magnum chopper gun.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 5.2.1, 5.2.2, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	FB02	Filter Bank #2

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
GB01	Gel Coat Booth #1 <i>Prefabricated gel booth with Magnum HVLP gel coat gun.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.1, 5.2.2, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	AP01	Arrestor Pad Bank #1
GB02	Gel Coat Booth #2 <i>Prefabricated gel booth with Magnum HVLP gel coat gun.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.1, 5.2.2, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13	AP02	Arrestor Pad Bank #2
MC01	Marble Casting Operation #1 <i>Mixing of casting resin and calcium carbonate and pouring of matrix into open molds.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12	None	None
MP01	Manual Pour Area #1 <i>Mixing of casting resin and calcium carbonate and pouring of matrix into open molds.</i>	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12	None	None
RT01	Main Resin Tank	391-3-1-.02(2)(vv)	2.1.1, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12	None	None

C. Equipment & Rule Applicability

Emission and Operating Caps –

None applicable.

Applicable Rules and Regulations -

With potential to emit more than 50 tpy of VOC, more than 10 tpy of any single HAP, and more than 25 tpy of combined HAP, Atlanta Marble Mfg.'s operations using VOC and HAP-containing materials are subject to Title V and Georgia Air Quality Rule 391-3-1-.02(2)(tt) requirements. The facility is a minor source with respect to non-attainment NSR regulations due to a VOC emission limit of less than 50 tpy.

1. Equipment Federal Rule Standards:

40 CFR 63 Subpart WWWW, "Reinforced Plastic Composites Production", applies to open molding operations at Atlanta Marble Mfg using HAP-containing materials. The NESHAP requires regulated sources to meet a total HAP emissions limit based on a point value system weighted and determined by the facility's method of operation and application methods. Sources are also subject to work practice standards that include

utilizing cleaning solutions that do not contain HAPs and ensuring all HAP-containing storage vessels remain covered. If total HAP emissions for an existing source from centrifugal casting or continuous lamination/casting operations exceed 100 tons per year, then the facility must install pollution abatement technology in order to realize a 95% decrease in emissions. Atlanta Marble Mfg. is an existing source that does not operate any centrifugal or continuous lamination/casting operations; therefore, the facility is not subject to that control requirement as specified in 40 CFR 63.5799 (not required to calculate emissions to determine if 95% control is applicable because the facility does not operate a centrifugal or continuous lamination/casting operation).

2. Equipment SIP Rule Standards:

Ga. Rule (b), “Visible Emissions”, applies to all sources of visible emissions. Visible emissions are limited by this rule to less than 40 percent opacity, actual visible emissions from all operations are expected to be much less than the allowable. Incorporated into permit as Condition 3.4.1.

Ga. Rule (e), “Particulate Emission from Manufacturing Processes”, applies to all particulate-generating processes that are not covered by a more specific rule or regulation. Particulate emissions are limited by the equation $E = 4.1(P^{0.67})$. Incorporated into the permit as Condition 3.4.2.

Ga. Rule (tt), “VOC Emissions from Major Sources”, applies to counties in the non-attainment area (included DeKalb County) that have the potential VOC emissions, not subject to another VOC rule, in amounts equal to or greater than 25 tpy. The facility is required to use “reasonably available control technology” (RACT) in controlling VOC emissions. RACT means the utilization and/or implementation of water-based or low solvent coatings, VOC control equipment such as incineration, carbon absorption, refrigeration, or other like means as determined by the Director to represent reasonably available control technology for the source category in question. The facility’s VOC emissions are composed mainly of styrene, both a HAP and a VOC. As a result, the facility is also subject to the 40 CFR 63 Subpart WWWW (Reinforced Plastic Composites NESHAP). The Division is adopting the standards of NESHAP Subpart WWWW as RACT per Ga. Rule (tt) because the majority of facility emissions are comprised of both HAP and VOC. However, Ga. Rule (tt) applies to all VOC. Thus, the RACT provision based upon the standards of the NESHAP will apply to all VOC at this facility as well. Incorporated into the permit as Condition 3.4.3.

Ga. Rule (vv), “Volatile Organic Liquid Handling and Storage”, applies to storage tanks with capacities greater than 4,000 gallons. Rule (vv) limits the transfer of VOL other than gasoline from a delivery vessel to a storage tank unless the tank has submerged fill lines. These requirements are detailed in Condition 3.4.4.

D. Compliance Status

Section 11.10 forms were not submitted by the facility indicating noncompliance with any Federal or State rules. However, as discussed in Section II.C of this narrative, the facility has

been found to be out of compliance and is currently under a consent order (Consent Order No. EPD-AQC-3243).

E. Operational Flexibility

Atlanta Marble has not requested any operational flexibility.

F. Permit Conditions

Equipment Federal Rule Standards

- 3.3.1 Established 40 CFR 63 Subpart WWWW, Reinforced Plastic Composites NESHAP.
- 3.3.2 Describes the applicable HAP emission limits (or HAP content limits) as specified by Reinforced Plastic Composites NESHAP for specific facility operations (open molding).
- 3.3.3 Describes the applicable work practice standards of the Reinforced Plastic Composites NESHAP.

Equipment SIP Rule Standards

- 3.4.1 Establishes Ga. Rule (b).
- 3.4.2 Establishes Ga. Rule (e).
- 3.4.3 Establishes the RACT (“reasonably available control technology”) as required by Ga. Rule (tt). Describes VOC emission limits (or VOC content limits) for specific facility operations (open molding).
- 3.4.4 Establishes Ga. Rule (vv).

Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

- 3.5.1 Details the filter change-out procedures for Emission Unit Groups CG01 and CG02.
- 3.5.2 Details the arrestor pad change-out procedures for Emission Unit Groups GB01 and GB02.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

Conditions are included which specify that a performance test may be required to determine compliance with the emission limits in Part 3.0 and that list the test methods to be used to determine compliance. A condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

None applicable.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

The permit requires that any monitoring system installed be in continuous operation except when under repair, and that maintenance or repair be conducted in an expedient manner.

B. Specific Monitoring Requirements**1. Individual Equipment:****a. Specific monitoring requirements**

Condition 5.2.1 requires that the pressure drop on emission units CG01, CG02, GB01 and GB02 be recorded once per day of operation. The facility monitors this parameter in order to determine when filters and/or pads require replacement (as required by Conditions 3.5.1 and 3.5.2). The filter or pad manufacturer's specifications establish the pressure drop range that, when exceeded, filter or pad replacement must be done.

No monitoring is required for opacity or particulate matter for Emission Units MC01 and MP01 listed in Conditions 3.4.1 and 3.4.2. The facility uses only natural gas and propane for its combustion process, typically producing insignificant opacity and particulate emissions. The organic VOC and HAP used likewise have insignificant levels of opacity and particulate matter emissions.

Note: There is no likelihood of Emission Units MC01 and MP01 violating the standards of Ga. Rules (b) and (e) due to the inherent design and operation of these units. Consequently, no specific monitoring to demonstrate compliance with these emission standards is included in this permit.

b. Record keeping and Reporting for monitoring

Condition 5.3.1 requires that the data acquired from compliance with Conditions 5.2.1 be kept as specified by Conditions 6.1.1 and 6.1.6. It also requires reports to be submitted as specified by Condition 6.1.4.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

Records are required to be retained for a period of five years. The records are required to be kept in a permanent form suitable for inspection and submission to the Division and EPA. The permit requires reporting of any deviations as indicated by the required monitoring to be reported every six months. A requirement to promptly report upset conditions resulting in lengthy excess emissions is also included.

B. Specific Record Keeping and Reporting Requirements

1. Plant wide

Condition 6.2.1 requires the maintenance of records of any materials used throughout the facility containing VOC or HAP.

Conditions 6.2.2 through 6.2.3 describe the emission calculations, notifications and reporting the facility must do to demonstrate compliance with the plant-wide VOC emission limit specified in Condition 2.1.1 (i.e., 49 tons per 12 consecutive months). The Permittee is to perform VOC emission calculations on a monthly basis, maintain records of these calculations, and notify the Division if VOC emissions exceed 4.08 tons during any calendar month. From these monthly records, the Permittee is to calculate a 12-month rolling total of VOC emissions for each calendar month. These totals are to be included in the Permittee's semi-annual excess emissions, exceedances, and /or excursions report.

Conditions 6.2.4 through 6.2.10 describe the emission calculations, notifications and reporting the facility must do to demonstrate compliance with compliance with the HAP emission limits of the Reinforced Plastic Composites NESHAP (specified in Conditions 3.3.2 and 3.3.3). Condition 6.2.4 provides guidance on the determination of HAP content. Condition 6.2.5 details how the facility can demonstrate compliance with NESHAP requirements through: (a) calculating HAP emission factors, (b) HAP emission factor averaging, or (c) compliance with HAP content limits. Conditions 6.2.6 through 6.2.8 describe the record keeping requirements of the NESHAP. (Note: Condition 6.2.7 describes how the facility can avoid the requirements of Condition 6.2.6 (i.e., maintaining records of the HAP content of resins and gel coats used at the facility) by an initial demonstration that materials used by the facility comply with the NESHAP's HAP emission or content limits specified in Condition 3.3.2.) Condition 6.2.9 describes how the facility will show initial compliance with the requirements of the NESHAP. Condition 6.2.10 describes the NESHAP's notification and reporting requirements.

Conditions 6.2.11 and 6.2.12 describe the emission calculations, notifications and reporting the facility must do to demonstrate compliance with the VOC emission limits of Ga. Rule (tt)'s RACT requirements (specified in Condition 3.4.3). Condition 6.2.11 details how the facility can demonstrate compliance with RACT requirements through the calculation of VOC emission factors. Condition 6.2.12 requires the facility to maintain usage records of VOC-containing resins and gel coats.

2. Individual Equipment

Condition 6.2.13 requires a log to be kept of all filter and arrester pad changes as specified by Conditions 3.5.1 and 3.5.2, respectively.

3. Equipment Groups

None applicable.

VII. Specific Requirements

Note: Be sure to discuss any stratospheric ozone protection requirements (see subsection J.) that may apply to the source.

A. Operational Flexibility

- Not applicable.

B. Alternative Requirements

- Not applicable.

C. Insignificant Activities

- The insignificant activities are listed in Appendix B of the Title V operating permit. This list was created from Section 4.10 of the Permittee's permit application.

D. Temporary Sources

- Not applicable.

E. Short-Term Activities

- Not applicable.

F. Compliance Schedule/Progress Reports

- The facility will be required to comply with conditions of Consent Order No. EPD-AQC-3243 (executed on November 22, 2002).

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Prevention of Accidental Releases

- Not applicable.

J. Stratospheric Ozone Protection Requirements

- Facility is not subject to Title VI of the Clean Air Act per Section 3.11 of Application No. TV-13749.

K. Pollution Prevention

- Not applicable.

L. Specific Conditions

- Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The public notice for Atlanta Marble Manufacturing's Title V permit was published in on in *The Champion Newspaper* on October 16, 2003. The only comments received were those made the Georgia Chapter of the Sierra Club. Dina B. Crockett submitted these comments. The 30-day comment period ended on November 15, 2003. The comments are reproduced below, along with Division responses.

Comments from the Georgia Chapter of the Sierra Club:

- 1.1 Comment: THE FULL REPORT ON MALFUNCTIONS SHOULD BE SUBMITTED WITHIN 7 DAYS.

Condition 6.1.2 does not represent 391-3-1-.02(6)(b)1(iv) accurately. It can therefore be interpreted as requiring two reports: the first to inform the Division of a malfunction within 7 days of the occurrence; the second to discuss probable causes and corrective actions, to be submitted any time after the occurrence of the malfunction at the facility's discretion. There is no deadline for the facility to submit the latter report.

The US EPA Region IV must have overlooked the ambiguity of this condition when it approved the template. We do recommend that the condition be corrected in the template to make it clear that the full report is due within 7 days, as required by the cited regulation

Response: EPD disagrees with this comment. Condition 6.1.2 is one of the standard conditions in the Georgia Title V permit template, per an agreement with US EPA Region IV, which reviewed and approved the wording of the template. EPD believes the condition is clear and that it requires a single report to be submitted within 7 days and shall contain information specified in the second sentence. The permit has not been changed in response to this comment.

- 1.2 Comment: CONDITION 6.1.4 MUST NOT RELY ON DISCRETIONARY DECISIONS.

Section (c) under 6.1.4 seems to rely on off-permit definitions determined by the Director:

The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.

According to this paragraph, the Director is granted sole discretion in determining the applicable definitions for non-compliance. We suggest 'as determined by this permit' instead.

Response: EPD disagrees with this comment. Condition 6.1.4 is one of the standard conditions in the Georgia Title V permit template, per an agreement with US EPA Region IV, which reviewed and approved the wording of the template. EPD believes the condition is clear and that it requires the facility to "... submit a written report containing any excess emissions, exceedances, and/or excursions *as described in this permit* [emphasis added] and any monitor malfunctions for the semiannual period ...". The permit has not been changed in response to this comment.

1.3 Comment: COMPLIANCE RECORDS MUST BE SUBMITTED TO THE DIVISION.

Title V is supposed to make it possible for the public to determine the degree to which facilities comply with air pollution laws and regulations. Hence the Division should aim to provide open access to all compliance records.

The Permittee is instructed to maintain all compliance records in a form suitable for inspection or submittal. Requiring submittal will allow members of the public to track the facility's emission levels and its efforts to minimize the harm it does to the quality of the air we breathe.

Response: The permit has not been changed in response to this comment. This comment has previously been made by the Sierra Club and has been rejected by EPA Region IV. 40 CFR §70.6(a)(3)(iii)(A) does require the submittal of monitoring reports every 6 months, but not the submittal of all monitoring data. Condition 6.1.4 of the permit complies with this requirement. In a letter from Winston Smith, Director of Air, Pesticide and Toxics Management Division of Region 4 EPA to Robert Ukeiley, Counsel for the Sierra Club, dated March 29, 2002, Mr. Smith noted that "EPD has reasonably interpreted 40 CFR§70.6(a)(3)(iii)(A)" in EPA's review of condition 6.1.4.

1.4 Comment: SECTION 112(r) PROBLEM.

Condition 7.10.1 is to apply "when and if" the requirements of 40 CFR Part 68 become applicable. At the very least, the permit must state explicitly whether the requirements are applicable at the time the permit is issued

Response: The applicability of 112(r) is triggered by a facility storing certain specific chemicals or flammable materials in amounts above their corresponding threshold quantities. Different sections of 112(r) apply, depending on the chemical or substance being stored. A facility may increase or decrease the amount of a material stored, or start or cease storing a particular material, all without triggering any air quality permitting activity. The applicability of 112(r) to a facility may change several times during the lifetime of their Title V permit, therefore, this permit condition is included in all of Georgia's Title V permits, whether applicable to the facility at the time of permit issuance or not.

2.1. Comment: VISIBLE EMISSIONS SHOULD BE MONITORED.

The Permittee's production processes involve marble dust as the primary raw material and also as a byproduct of grinding and trimming. Yet the Permittee is not required to control this dust in any specific way. The permit ought to include enforceable dust suppression measures and monitoring of visible emissions at regular intervals.

Response: The permit has not been changed in response to this comment. The facility's fugitive dust emissions are regulated by Section 8.22, "Fugitive Dust" of the permit. Conditions 8.22.1 and 8.22.2 detail the requirements of Georgia Rule 391-3-1-.02(2)(n), "Fugitive Dust". Condition 8.22.1 requires facility to prevent fugitive dust and suggest measures on how to do so. Condition 8.22.2 limits the opacity from fugitive dust to no greater than 20%.

2.2. Comment: OPACITY MONITORING METHODS MUST BE SPECIFIED.

Condition 4.1.3.f defines appropriate testing methods for determining the opacity of emissions. In addition to Method 9, the Permittee is instructed to use “the procedures of Section 1.3”. Section 1.3 is an overall process description. Procedures for determining opacity must be identified clearly in Condition 4.1.3.f.

Response: Condition 4.1.3.f refers to Section 1.3, “Compliance with Standards and Maintenance Requirements”, of the Division’s *Procedures for Testing and Monitoring Sources of Air Pollutants*. The following change was made to Condition 4.1.3.f:

- f. Method 9 and the procedures of Section 1.3 of the above referenced document for the determination of the opacity of emissions, and; ...

2.3 Comment: EMISSION CAPS IN THE NARRATIVE MUST BE CORRECTED.

Sections II.E and VI.B.1 in the Narrative cite incorrect limits for VOC emissions: 100 tpy, and 8.3 tons during any calendar month. These limits must be corrected to 49 tpy and 4.08 tons.

Response: These changes were made.

2.4 Comment: TABLES 1 and 3 MUST BE EXPLAINED.

Condition 3.3.2 sets HAP emission limits by reference to Table 1. The table contains HAP limits in two columns. In the MACT, the right-hand column is explained as follows:

A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.

Without this explanation, it is impossible to understand the table.

Table 3 requires the same explanation.

Response: The following changes made:

A footnote was added below Table 1 with the explanation of Column 4 as presented by the commenter. (This footnote mirrors the language of 40 CFR Subpart WWWW’s Table 3, footnote 2.)

A footnote was also added to Table 3 stating the following: “A compliant resin or gel coat means that if its VOC content is used to calculate a VOC emissions factor, the factor calculated does not exceed the appropriate VOC emissions limit shown in the table.”

2.5 Comment: TABLES 4 AND 8 MUST BE ADAPTED TO THE PERMIT.

Tables 4 and 8 refer to a nonexistent Footnote f. Footnote b under these tables reproduces the reference from the MACT, which makes no sense within the permit. Please correct.

Response: References made to “footnote f” in Tables 4 and 8 were changed to “footnote e”.

2.6 Comment: CALCULATIONS OF HAP EMISSIONS MUST BE CORRECTED.

Condition 6.2.4 explains how the facility should demonstrate compliance with the limits on HAP emissions that are set in Condition 3.3.2. The methods of Condition 6.2.4 depart from the guidelines in 40 CFR 63.5810 and are consequently quite confusing. What is more, they will not demonstrate compliance adequately. The following are the specifics.

2.6.1 Paragraphs 6.2.4.a.i and 6.2.4.a.ii require calculations of emission factors for the preceding month. The corresponding paragraphs in the MACT require calculations of the same factors for the preceding 12 months, to be performed every month.

2.6.2 Paragraph 6.2.4.a.iii requires calculation of an additional monthly factor. This calculation is absent from the MACT and we have been unable to determine its purpose.

2.6.3 Paragraph 6.2.4.a.iv requires the calculation of a factor for the preceding 12 months based on the factor obtained in 6.2.4.a.iii. We doubt the validity of the resultant factor and whether it can be compared to the limits found in Table 1 of Condition 3.3.2. In any case the calculations in step iv are not necessary if the Permittee is instructed to perform the calculations in steps 6.2.4.a.i and 6.2.4.a.ii on a 12-month basis as mandated by the MACT.

2.6.4 Condition 6.2.4.b.i yields a 12-month emission limit, as required by the MACT. The following condition, Condition 6.2.4.b.ii, is supposed to calculate a monthly factor, but the “Material” in the formula represents the last twelve months. The product of this calculation cannot possibly be valid.

2.6.5 Condition 6.2.4.b.iii treats the 12-month product of Condition 6.2.4.b.i as a monthly limit and requires the Permittee to sum it up in order to obtain a 12-month limit. This is not only unnecessary but also totally invalid. The calculation of a 12-month factor from 6.2.4.b.ii is likewise unnecessary if the initial calculations are made for 12 months as specified in the MACT.

Response: 2.6.1, 2.6.2 and 2.6.3 The language of Condition 6.2.4 has been replaced with guidance on the determination of HAP content. Condition 6.2.5(a) represents the previous Condition 6.2.4(a) rewritten for clarity and ease of application. See the following changes below:

6.2.4 For any emission calculations require in Condition Nos. 6.2.5 through 6.2.10, the Permittee may rely on information provided by the material manufacturer, such as manufacturer’s formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this condition, as applicable, to determine the organic HAP content of resins and gelcoats.
[40 CFR 63.5797]

- a. The Permittee shall include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
- b. If the organic HAP content is provided by the material supplier or manufacturer as a range, the Permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, the Permittee shall use the measured organic HAP content to determine compliance.
- c. If the organic HAP content is provided as a single value, the Permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee must use the measured organic HAP content to determine compliance.

6.2.5 The Permittee shall maintain written records demonstrating compliance of open molding gelcoat operations with the applicable standards specified in Condition No. 3.3.2, using one of the methods specified in paragraphs (a) through (c) below. The necessary calculations must be completed within 20 days after the end of each calendar month. The Permittee may switch between the compliance options in paragraphs (a) through (c). When changing to an option based on a 12-month rolling average, the Permittee must base the average on the previous 12 months of data calculated using the compliance option currently being used, unless currently using the compliant materials option in paragraph (c). In that case, the Permittee must immediately begin collecting gelcoat usage data and demonstrate compliance 12 months after changing options.

[40 CFR 63.5810(a), (b), and (d)]

a. Calculated organic HAP emission factor option:

The Permittee shall meet the individual organic HAP emissions limits for each operation and demonstrate compliance with the individual organic HAP emissions limits for each applicable type of open molding gelcoat operation listed in Condition No. 3.3.2. This is to be done in two steps. First, determine an organic HAP emission factor for each individual gelcoat and application method used in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on gelcoat use. The calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Condition No. 3.3.2 based on a 12-month rolling average. The Permittee shall use the procedures described in paragraphs (i) through (iii) below to calculate average organic HAP emissions factors for each operation.

- i. Calculate the *actual* emission factors for each different process stream within each operation type using the appropriate equations from Table 4, below. A process stream is defined as each individual combination of gelcoat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following three characteristics vary: the neat gelcoat plus organic HAP content, the application technique, or the control technique. The Permittee shall calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 4 on the next page for open molding gelcoat application (or site-specific organic HAP emissions factors as described in 40 CFR 63.5796). If using vapor suppressants to meet the organic HAP emissions limit for open molding gelcoat application, determine the

vapor suppressant effectiveness by conducting testing according to the procedures specified in appendix A to 40 CFR 63 Subpart WWWW.

[Table 4 presented here.]

- ii. Calculate the *actual* operation organic HAP emissions factor for the last 12 months for each open molding operation type by calculating the weighted average of the individual process stream organic HAP emissions factors within each respective operation. To do this, sum the product of each individual organic HAP emissions factor (calculated in paragraph (a)(i) above) and the amount of neat gelcoat plus usage that correspond to the individual factors, then divide the numerator by the total amount of neat gelcoat plus used in that operation type. Use the equation below to calculate the actual organic HAP emissions factor for each open molding gelcoat operation type.

$$AEF = \frac{\sum_{i=1}^n (APSEF_i * Material_i)}{\sum_{i=1}^n Material_i}$$

Where:

AEF = Actual operation organic HAP emissions factor, lbs/ton of neat gelcoat plus

APSEF_i = Number of process streams where facility calculated a point value

Material_i = Neat resin plus or neat gel coat plus used during calendar month for process stream "i", in tons

n = Number of process streams for which an organic HAP emissions factor must be calculated

2.6.4 and 2.6.5 Condition 6.2.5(b) represents the previous Condition 6.2.4(b) rewritten for clarity and ease of application. See the following changes below:

- b. HAP emission factor averaging option:

The Permittee shall demonstrate compliance each month with the weighted average of the applicable organic HAP emissions limits in Condition No. 3.3.2. When using this option, compliance with overall weighted average organic HAP emissions limit for all open molding gelcoat operations must be demonstrated, using the procedures described in paragraphs (i) through (iii) below.

- i. Each month calculate the weighted average organic HAP emissions limit for all open molding gelcoat operations at the facility for the last 12-month period. To do this, multiply the individual organic HAP emissions limits in Table 1 of Condition No. 3.3.2 for each open molding gelcoat operation type by the amount of neat gel coat plus used in the last twelve months for each operation type. The results are summed and then divided by the total amount of neat gel coat plus used throughout the facility over the last twelve months. The following equation illustrates this method.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * Material_i)}{\sum_{i=1}^n Material_i}$$

Where:

EL_i = Organic HAP emissions limit for operation type i, lbs/ton from Condition No. 3.3.2

$Material_i$ = Neat gelcoat plus used during the last 12-month period for operation type i, tons

n = Number of operations

- ii. Each month, calculate the actual weighted average organic HAP emissions factor for open molding gelcoat operations. To do this, multiply each actual open molding gelcoat operation organic HAP emissions factor by the amount of neat gelcoat plus used in each open molding gelcoat operation type. The results are summed for all operation types and divided by the total amount of neat gelcoat plus used in all open molding gelcoat operations. Individual actual organic HAP emissions factors for each open molding gelcoat operation type must be calculated as described in paragraphs (a)(i) and (a)(ii) of this Condition. This procedure is illustrated by the following equation.

$$AWAEF = \frac{\sum_{i=1}^n (\text{Actual Individual } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

Where:

AWAEF = Actual weighted average organic HAP emissions factor, lbs/ton of neat gelcoat plus

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton

$Material_i$ = Neat gelcoat plus used during the last 12 calendar months for operation type i, tons

n = Number of operations

- iii. Compare the values calculated in paragraphs (b)(i) and (b)(ii) above. If each 12-month rolling average organic HAP emissions factor calculated in paragraph (b)(ii) is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit calculated in paragraph (b)(i), compliance has been demonstrated.

2.7 Comment: CALCULATIONS OF VOC EMISSIONS MUST ALSO BE CORRECTED.

The procedures for determining compliance with limits on VOC emissions are described under Condition 6.2.10. They correspond to the faulty procedures for determining compliance with limits on HAP emissions. Our comments under 2.6 above also apply to Condition 6.2.10.

Response: Condition 6.2.11 (previously Condition 6.2.10) has been rewritten to reflect the changes made to the language of the previous Condition 6.2.4 (described in the Response to Comment 2.6 above).

2.8 Comment: THE PERMIT MUST REQUIRE AN SSM PLAN.

Condition 6.2.10.d.iv refers to “the facility’s startup, shutdown, and malfunction plan”. The requirement to develop the plan is missing from the permit.

Response: It appears that the commenter was referring to the previous Condition 6.2.9.d.iv (it is now Condition 6.2.10.d.iv). 40 CFR §63.5835(d) states: “You must develop and implement a written startup, shutdown, and malfunction plan according to the provisions in § 63.6(e)(3) for any organic HAP emissions limits you meet using an add-on control.” This facility will not use add-on controls to meet its HAP emission limits; thus, it is not required by 40 CFR Subpart WWW to submit the above-described startup, shutdown, and malfunction (SSM) plan. With respect to the language of the 40 CFR §63.5835(d), the following change was made:

- iv. In the event of a startup, shutdown, or malfunction during the reporting period, if 40 CFR 63.5835(d) requires the Permittee to develop and implement a startup, shutdown, and malfunction plan and actions were taken consistent with those specified in this plan, the report shall include information specified in 40 CFR 63.10(d)(5)(i).

2.9 Comment: CONDITION 7.7.1 HAS NO DEADLINE.

Condition 7.7.1 should include a deadline for the facility’s compliance with the requirements of the Consent Order.

Response: This change was not made. The Consent Order referenced to in Condition 7.7.1 contains the Order’s compliance requirements, including the deadline for the facility’s compliance.

2.10 Comment: THE NARRATIVE SHOULD BE CORRECTED.

- 2.10.1.1 The Process Description in the Narrative and in the Draft Permit refers to a “heated cur tunnel”. This is apparently a “cure” tunnel.
- 2.10.1.2 Section VI.B states “The engineer should give an explanation ...”. It is not clear which engineer.
- 2.10.1.3 The third paragraph under VI.B.1 has several errors which make it unintelligible.

Response: 2.10.1.1 This change was made.
2.10.1.2 This paragraph was removed. It is internal guidance to the permitting engineer and is not meant to be included in the Narrative.
2.10.1.3 This paragraph was rewritten in order to make the information presented more easily understood.