

Facility Name: **Spurlin Industries, Inc. – Palmetto, GA**
 City: Palmetto
 County: Fulton
 AIRS #: 04-13-121-00705

Application #: TV-17679
 Date Application Received: September 18, 2007
 Permit No: 3088-121-0705-V-02-0

Program	Review Engineers	Review Managers
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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. Section 391-3-1.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 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 **Spurlin Industries, Inc. – Palmetto, GA** 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: Spurlin Industries, Inc. – Palmetto, GA
2. Parent/Holding Company Name
Spurlin Industries, Inc.
3. Previous and/or Other Name(s)
None.
4. Facility Location
625 Main Street
Palmetto, GA 30268 (Fulton County)
5. Attainment, Non-attainment Area Location, or Contributing Area
The facility is located in the Atlanta Ozone non-attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3088-121-0705-V-01-0	August 14, 2003	Initial Title V

D. Process Description

1. SIC Codes(s)
3088
2. Description of Product(s)

The operation consist of a fiberglass bath products manufacturing facility. Products in clued reinforced fiberglass tubs and shower.

3. Overall Facility Process Description

The Spurlin Industries facility located in Palmetto, Georgia manufactures gelcoat bath products. The facility first receives raw materials including gelcoat and catalyst materials, which are spray-applied to molds to form molded bath products at Gelcoat Spray Booth #1. Emissions from this spray booth are exhausted through stack S001. The molds are then sent to a Chop Booth where a styrene-based resin mix and fiberglass filament are spray-applied to add structural support to the molds. This operation is vented to the outside via stack S002. Next, the molds are transferred to the Trim Station, where they are trimmed as needed. The molds are then pulled and the products cut and drilled at the Pull, Cut, and Drill Station. The bath products are the sent to the Grinding Booth, where the edges are removed by sawing operations. Particulate matter generated by this process is collected by an indoor dust collector, and the filtered air is exhausted to the inside plant air. The product is then sent to buffing and inspection, packaging, and storage prior to shipping.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Spurlin is a major source for VOC emissions since the non-attainment PSD/NSR threshold is currently 25 tons per year. The facility has a 100 tons per year VOC limit from a previous NSR avoidance. When the facility was constructed in 1991, the Atlanta-area non-attainment NSR threshold at that time was 100 tpy. The threshold decreased to 50 tpy and then to 25 tpy in 2004. The facility's potential NO_x emissions are less than 25 tons per year.

2. Title V Major Source Status by Pollutant

Table 2: 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	✓			✓

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
CO	No			
TRS	No			
H ₂ S	No			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The facility is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastics Composites Production, which is codified as 40 CFR Part 63 Subpart WWWW.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Emission and operating caps specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

No noncompliance issues were identified in the application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Permit Conditions specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative. There are no new permit conditions for the Title V Renewal.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 3088-121-0705-V-01-0. Please refer to this narrative.

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
GS01	Gelcoat Spray Booth #1	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, 3.4.4, 3.5.1, 6.1.7, 6.2.1 through 6.2.16	FF1	Fabric Filter
CB01	Chop Booth #1	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, 3.4.4, 3.5.1, 6.1.7, 6.2.1 through 6.2.16	FF2	Fabric Filter
GRT1	5,000-gallon Resin Tank	391-3-1-.02(2)(vv) 40 CFR 63 Subpart WWWW	2.1.1, 3.4.3, 6.2.1 through 6.2.16	N/A	None

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3088-121-0705-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Emission and Operating Caps:

Emission and Operating Caps specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Since the initial Title V permit was issued in 2003, 40 CFR 63 Subpart WWWW has been amended for clarification to sections of the rule. These updates are reflected in conditions 3.3.3 and 3.3.4.

Since standards of 40 CFR 63 Subpart WWWW were adopted as RACT per Georgia Rule (tt), the table in condition 3.4.4 was updated as well.

Rules and Regulations Assessment:

Rules and Regulations Assessment specified in Permit No. 3088-121-0705-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

D. Compliance Status

No noncompliance issues were identified in the application.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Permit Conditions specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

Condition 3.3.1 has been modified to omit the last sentence of the condition. The listed conditions are currently effective because it is now after the NESHAP compliance date.

Condition 3.3.2 has been added as a result of the clarification of 40 CFR 63 Subpart WWWW.

Conditions 3.3.3, 3.3.4, and 3.4.4 have been modified as a result of the amended 40 CFR 63 Subpart WWWW.

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

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**1. Individual Equipment**

None applicable.

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

None applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements**1. Individual Equipment:**

Monitoring requirements specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

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

Monitoring requirements specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 3088-121-0705-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition 6.1.8 was added because the facility is located in the metro-Atlanta non-attainment area and is major for VOC's. The facility is required to submit an annual VOC emissions statement to the Division.

After the initial Title V permit was issued in 2003, 40 CFR 63 Subpart WWWW was amended for clarification to sections of the rule. Conditions 6.2.4 through 6.2.10 were modified and renumbered to 6.2.4 through 6.2.14 to reflect the 2005 amendment of 40 CFR 63 Subpart WWWW.

VII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The Division's files indicate that the facility does not currently have any compliance issues

G. Emissions Trading

None Applicable.

H. Acid Rain Requirements

None Applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they have air conditioners or refrigeration equipment that use CFC's, HFC's or other stratospheric ozone-depleting substances. The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

J. Pollution Prevention

None Applicable.

K. Specific Conditions

None 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 30-day public review ended on April 4, 2008. Comments were not received by the Division.