

TITLE V APPLICATION REVIEW

Facility Name: **Scholle Corporation**

City: College Park

County: Fulton

AIRS #: 04-13-121-00715

Application #: TV- 11445

Date Application Received: May 13, 1999

Date Application Deemed

Administratively Complete: July 12, 1999

Date of Draft Permit: March 22, 2000

Permit No: 2851-121-0715-V-03-0

| Program | Review Engineers | Review Managers |
|-----------------|-------------------------|------------------------|
| SSPP/ASU | Matthew Page | Terry Johnson |
| SSCP/ASU | Chris Hurst | James Eason |
| ISMP | George Garten | Richard Taylor |
| TOXICS | n/a | n/a |

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 in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Scholle Corporation 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Scholle Corporation

2. Parent/Holding Company Name

Scholle Corporation

3. Previous and/or Other Name(s)

None

4. Facility Location

2300 West Point Avenue
College Park, Georgia 30337
Fulton County

5. Attainment or Non-attainment Area Location

The facility is located in the Atlanta non-attainment area for ground level ozone

6. Class I Area Impacts

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

B. Site Determination

There are no applicable issues.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the “Permit” file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.”

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 |
| 2851-121-0715-E-02-0 | September 30, 1999 | x | |

Table 2: Comments on Specific Permits

| Permit Number | Comments |
|----------------------|---|
| 2851-121-0715-E-02-0 | Our records indicate that a consolidated major source permit was issued for the new chemical mixer M08 and includes a 100 tpy Facility wide VOC limitation. |

D. Process Description

1. SIC Code

Primary SIC Code: 2851 - Chemical Solutions
 Other SIC Code: 2819 - Cleaners/acids/electrolytes

2. Description of Products

The facility blends a variety of specialty chemicals utilizing several non-reactive bulk mixers.

3. Overall Facility Process Description

Nitrocellulose and acrylic resins are dissolved in various solvents and blended in one of eight chemical mixers (Emission Unit ID Nos. M001 through M008) producing air-dried coatings. Sulfuric acid and water are mixed and blended to produce cleaners and battery fluids. The facility utilizes thirteen storage tanks (Emission Unit ID Nos. ST01 through ST11, ST13, and ST14) to store solvents and resins. The coatings or chemicals are dispensed into and shipped in 55 gallons drums. The facility also utilizes one small sulfuric acid storage tank (Emission Unit ID No. AT01) and three small sulfuric acid mixers (Emission Unit ID Nos. SM01, SM02, and SM03). The facility operates acid bag and box packaging lines. The emissions from the filling and mixing operations are VOC and HAP.

4. Overall Process Flow Diagram (optional)

Process diagrams are included with Title V Application No. TV-11445.

5. Facility Wide Emission Summary

The facility wide emissions were estimated as part of the review for Permit Application No. 11409.

Table 3: Facility Wide Emissions Summary for Scholle Corporation - College Park

| Pollutant | Potential Emissions - Uncontrolled (tpy) | Potential Emissions - with Permit Limits (tpy) | Anticipated Actual Emissions (tpy) |
|--------------|--|--|------------------------------------|
| VOC | > 100 | 100.0 | 68.54 |
| Combined HAP | > 25 | 25.0 | 14.0 |
| DBP | < 10 | < 10 | 0.06 |

Table 3: Facility Wide Emissions Summary for Scholle Corporation - College Park

| Pollutant | Potential Emissions - Uncontrolled (tpy) | Potential Emissions - with Permit Limits (tpy) | Anticipated Actual Emissions (tpy) |
|---------------|--|--|------------------------------------|
| Methanol | < 10 | < 10 | 0.04 |
| Toluene | > 10 | 10.0 | 6.36 |
| MEK | > 10 | 10.0 | 4.72 |
| MIBK | < 10 | < 10 | 1.41 |
| Glycol ethers | < 10 | < 10 | 1.4 |

The emissions of NO_x, SO₂, PM, and CO are primarily from the fuel burning equipment at the facility and are below major source thresholds.

6. A toxic impact assessment was performed on the facility as part of the review for Application No. 11409. SCREEN3 air dispersion modeling was performed on mixer M08 and it was determined that the new emission unit would not cause the facility to exceed the acceptable ambient concentration of any pollutant.

E. Regulatory Status

1. PSD/NSR

The facility is a major source under PSD/NSR regulations. The facility is limited to 100 tpy VOC in order to avoid LAER (lowest achievable emission rate) controls (Condition No. 5 of existing permit). The mixer M008 (Emission Unit ID Nos. M008) is limited to 15 tpy VOC (Condition No. 6 of existing permit) in order for the new mixer to avoid NSR. The 15 tpy VOC limitation for mixer M08 ensures that the facility wide VOC emissions increases during the five year contemporaneous period do not exceed 25 tpy.

The potential VOC emissions from the facility are limited to 100 tpy. The facility has potential NO_x emissions of less than 25 tpy.

2. Title V Major Source Status by Pollutant

Table 4: 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 | Yes | | | |
| PM ₁₀ | Yes | | | T |
| SO ₂ | Yes | | | T |
| VOC | Yes | T | | |

Table 4: 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 |
| NO _x | Yes | | | T |
| CO | Yes | | | T |
| TRS | n/a | | | |
| H ₂ S | n/a | | | |
| Individual HAP | Yes | | T | |
| Total HAPs | Yes | | T | |

Condition No. 7 limits the facility wide HAP emissions to less than 25 tpy of combined HAP and 10 tpy for each individual HAP. This limit ensures that the facility remains a synthetic minor source with respect to hazardous air pollutants (HAP).

3. MACT Standards

The facility was a potentially major source of HAPs before accepting practically enforceable permit limitations of 25 tpy for combined HAPs and 10 tpy for each individual HAP. The facility is now considered a synthetic minor source for HAPs. There is no MACT standard promulgated at this time for the chemical blending but one is required to be promulgated by EPA under Section 112(d) of the CAAA. The HAP limitations ensure that the facility will never be subject to review under Section 112(g) - case by case MACT.

4. Program Applicability

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

Regulatory Analysis

The following permit conditions discussed below will be federally enforceable by both the Georgia Environmental Protection Division and the US Environmental Protection Agency.

II. Facility Wide Requirements

A. Emission and Operating Caps:

1. Scholle Corporation has a VOC limitation of 100 tpy per condition No. 5 of permit No. 2851-121-0715-E-02-0. The VOC limitation was put in place in order for the facility to avoid LAER in the event that the facility had to undergo NSR for a modification. Per Georgia Rules Chapter 391-3-1-.03(8)(c)(13)iii, any facility that emits less than 100 tpy of VOC can substitute best available control technology (BACT) for LAER. However, the facility can emit 50 tpy of VOC or greater, therefore, the facility is a major source with respect to NSR. Facility wide VOC emissions are estimated to be 54.2 tpy based upon facility records submitted to the Division (letter dated February 16, 2000). The facility should continue to be in compliance with this emission limitation. The 100 tpy facility wide VOC limitation will be included in condition No. 2.1.1 of the Title V operating permit.

2. The facility will have a limitation of 25 tpy for combined HAP and 10 tpy for each individual HAP. The limitation is in place in order for the facility to be considered a synthetic minor source with respect to HAPs in order to avoid any future MACT standard that could be promulgated by USEPA per Section 112(d) of the CAAA. The HAP limitations also ensure that any future facility modification will not be subject to review under Section 112(g) as long as the facility wide HAP emissions remain below the major source thresholds. The establishment of HAP limitations of 25 tpy for combined HAPs and 10 tpy for each individual HAP via condition No. 7 of the current SIP permit (No. 2851-121-0715-E-02-0) ensure that the facility will remain a synthetic minor source for HAPs. Facility records submitted to the Division (letter dated February 26, 2000) indicate that Scholle Corporation should comply with these HAP emission limitations. Actual facility wide HAP emissions are estimated to be 15.36 tpy for combined HAP. The facility wide HAP limitations will be included in condition No. 2.1.2 of the Part 70 operating permit.

B. Applicable Rules and Regulations

! Rules and Regulations Assessment:

The facility has allowable emissions of greater than 25 tpy, therefore, the facility could be subject to Georgia VOC Rule (tt) "VOC Emissions from Major Sources." However, all of the VOC emissions from the facility are subject to a more specific VOC rule, therefore, Rule (tt) is not applicable for this facility.

! Emission and Operating Standards:

None Applicable

C. Compliance Status

The facility currently complies with all applicable requirement. Section 11.0 of the facility's Title V application does not note any compliance issues nor does the Division files.

D. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application. There are no new rules, regulations, or work practices that will be applicable to this source for the purpose of operational flexibility

E. Permit Conditions

1. Condition No. 2.1.1 limits the facility wide VOC emissions to less than 100 tons per any twelve consecutive month period. This condition is the same as Condition No. 5 of the current SIP Permit (No. 2851-121-0715-E-02-0).
2. Condition No. 2.1.2 limits the facility wide HAP emissions to less than 25 tons during any twelve consecutive month period for combined HAP and 10 tons during any twelve consecutive month period for each individual HAP. This condition is the same as Condition No. 7 of the current SIP Permit (No. 2851-121-0715-E-02-0).

III. Regulated Equipment Requirements

A. Brief Process Description

Nitrocellulose and acrylic resins are dissolved in various solvents and blended in one of eight chemical mixers (Emission Unit ID Nos. M001 through M008) producing air-dried coatings. All of the chemical mixers have an operating temperature of ambient. The mixers process nitrocellulose, ethyl acetate, acetone, methyl ethyl ketone (MEK), L.D. naphtha, isobutyl acetate, ethyl alcohol, toluene, isopropyl acetate, n-propyl acetate, methyl isobutyl ketone (MIBK), and isopropyl alcohol (IPA). Sulfuric acid and water are mixed and blended to produce cleaners and battery fluids. The facility utilizes thirteen storage tanks (Emission Unit ID Nos. ST01 through ST11, ST13, and ST14) to store solvents and resins. The coatings or chemicals are dispensed into and shipped in 55 gallons drums. The facility also utilizes one small sulfuric acid storage tank (Emission Unit ID No. AT01) and three small sulfuric acid mixers (Emission Unit ID Nos. SM01, SM02, and SM03). The facility operates acid bag and box packaging lines. The emissions from the filling and mixing operations are VOC and HAP.

B. Equipment List for the Process

Table 5: Equipment List for Scholle Corporation - College Park Facility

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|---|---|---|-------------------------------|-------------|
| ID No. | Description | Applicable Requirements / Standards | Corresponding Permit Conditions | ID No. | Description |
| M001 | 650 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M002 | 650 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M003 | 1500 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M004 | 1500 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M005 | 2100 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M006 | 1800 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M007 | 1800 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.11 | None | None |
| M008 | 1300 gallon non-reactive chemical mixer | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ccc) | 2.1.1, 2.1.2, 3.2.1, 3.4.1, 3.4.2, 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, and 6.2.11 | None | None |

Table 5: Equipment List for Scholle Corporation - College Park Facility

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|-------------------------------------|-------------------------------------|---|-------------------------------|-------------|
| ID No. | Description | Applicable Requirements / Standards | Corresponding Permit Conditions | ID No. | Description |
| ST01 | 10,000 gallon ethyl acetate UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST02 | 10,000 gallon acetone UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST03 | 10,000 gallon MEK UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST04 | 6,000 gallon naphtha UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST05 | 6,000 gallon isobutyl acetate UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST06 | 10,000 gallon ethyl alcohol UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST07 | 10,000 gallon toluene UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST08 | 10,000 gallon isopropyl acetate UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST09 | 6,000 gallon n-propyl acetate UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST10 | 6,000 gallon MIBK UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST11 | 6,000 gallon IPA UST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST13 | 8,000 gallon ethyl alcohol AST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |
| ST14 | 8,000 gallon n-propyl acetate AST | 391-3-1-.02(2)(vv) | 2.1.1, 2.1.2, 3.4.3, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, and 6.2.10 | None | None |

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

! Emission and Operating Caps:

1. The facility has a limitation on the VOC emissions from mixer M008 (Emission Unit ID No. M008) of 15 tons per any twelve consecutive month period. The mixer M08 was limited to 15 tpy of VOC in order to avoid NSR. A facility modification is subject to NSR if the VOC emission increases exceed 25 tpy over the five year contemporaneous period. The 15 tpy VOC limitation allows the facility to keep track of the VOC emission increases during the contemporaneous period and ensure that NSR is avoided. Condition No. 6 of the current SIP permit (No. 2851-121-0715-E-02-0) limits the VOC emissions from mixer M008 to less than 15 tpy.

! Applicable Rules and Regulations -

Rules and Regulations Assessment:

The facility is subject to the following Georgia Rules:

| | |
|---------------------|--|
| 391-3-1-.02(2)(b) | Visible Emissions |
| 391-3-1-.02(2)(e) | Particulate Emissions from Manufacturing Processes |
| 391-3-1-.02(2)(vv) | Volatile Organic Liquid Handling and Storage |
| 391-3-1-.02(2)(ccc) | VOC Emissions from Bulk Mixing Tanks |

The mixers (Emission Unit ID Nos. M001, M002, M003, M004, M005, M006, M007, and M008) are subject to Georgia Rule 391-3-1-.02(2)(b) because it applies to all sources that are subject to at least one other emission limitation and not subject to any other, more stringent, opacity standard.

All of the mixers (Emission Unit ID Nos. M001, M002, M003, M004, M005, M006, M007, and M008) are subject to Georgia Rule 391-3-1-.02(2)(e) because these emission units are considered new equipment, constructed after July 2, 1968. Therefore, the allowable particulate matter emissions is based on the following equation:

$E = 4.1 * (P)^{0.67}$ where E equals the allowable particulate emissions rate in lb/hr and P equals the process input weight rate in tons/hr. This equation applies only to process input rates up to and including 30 tons/hr. The emission units above will have very minor particulate matter emissions.

The storage tanks (Emission Unit ID Nos. ST01, ST02, ST03, ST04, ST05, ST06, ST07, ST08, ST09, ST10, ST11, ST13, and ST14) are subject to Georgia Rule 391-3-1-.02(2)(vv) because they each have a storage capacity of greater than 4,000 gallons, are located in Fulton County (a non-attainment county for ground level ozone), and the facility is subject to a more specific VOC Rule [Rule (ccc)].

The mixers (Emission Unit ID Nos. M001, M002, M003, M004, M005, M006, M007, and M008) are subject to Georgia Rule 391-3-1-.02(2)(ccc) because the emissions from the above emission units are greater than 25 tpy, combined and the facility is located in Fulton County (a non-attainment county for ground level ozone).

Emission and Operating Standards:

- 391-3-1-.02(2)(b) Visible Emissions: Limits opacity of an air contaminant source to less than 40 %. The mixer will not exceed this standard.
- 391-3-1-.02(2)(e) Particulate Emissions from Manufacturing Processes: Limits emissions of particulate matter from the mixers (Emission Unit ID Nos. M001, M002, M003, M004, M005, M006, M007, and M008) to from 2.58 pounds per hour to 9.49 pounds per hour (depending on the size of the tank) based on the formula $E = 4.1(P)^{0.67}$, E = emission rate in pounds per hour, P = process input weight rate in tons per hour = 0.5 tph to 3.5 tph (from Application No. TV-11445). Potential PM emissions are minimal and are less than 0.5 pounds per hour. There could be some slight particulate emissions from the resin.
- 391-3-1-.02(2)(vv) Volatile Organic Liquid Handling and Storage: Rule (vv) requires that each of the tanks be equipped with submerged fill pipes. A submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom. The facility is in full compliance with Rule (vv) per the Division's compliance files.
- 391-3-1-.02(2)(ccc) VOC Emissions from Bulk Mixing Tanks: Rule (ccc) requires that each chemical mixer is equipped with a cover which completely covers the tank except for an opening to allow for safe clearance of the mixer shaft. Rule (ccc) requires that any tank openings be covered except when operator access is necessary. Rule (ccc) also requires that the facility use drop tubes or low clearance fill pipes for the mixers. Rule (ccc) also requires the facility to use non-VOC containing cleaners for general and routine cleaning operations unless the cleanup cannot be accomplished without the use of a VOC containing solvent. All solvents must be stored in closed containers and disposed in a manner approved by the Division. The facility is in compliance with all applicable provisions of Rule (ccc).

D. Compliance Status

The facility currently complies with all applicable requirements. Section 11.10 of the facility's Title V application does not note any compliance issues nor do the Division files.

E. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application. There are no new rules, regulations, or work practices that will be applicable to this source for the purpose of operational flexibility

F. Permit Conditions

1. Condition No. 3.2.1 limits the VOC emissions from mixer M08 (Emission Unit ID No. M008) to no more than 15 tons during any twelve consecutive month period. Condition No. 6 of the current SIP permit (No. 2851-121-0715-E-02-0) limits the mixer M08 emissions to less than 15 tpy.

2. Condition No. 3.4.1 subjects Emission Unit ID Nos. M001 through M008 to Rule (b). This limits opacity from the above emission units to no greater than forty percent.
3. Condition No. 3.4.2 subjects Emission Unit ID Nos. M001 through M008 to Rule (e). This limits particulate matter emissions derived from $E = 4.1(P)^{0.67}$.
4. Condition No. 3.4.3 subjects Emission Unit ID Nos. ST01 through ST11, ST13, and ST14 to Rule (vv). This Rule requires that each of the tanks be equipped with submerged fill pipes.
5. Condition No. 3.4.4 subjects Emission Unit ID Nos. M001 through M008 to Rule (ccc). This Rule Requires the tanks to be covered at all times (except for maintenance) and be equipped with fill pipes. Only non-VOC containing cleaners (when possible) should be used and all waste solvents should be sent stored in closed containers.
6. Condition Nos. 10 and 11 of the SIP permit (No. 2851-121-0715-E-02-0) are incorporated into other conditions in the Title V operating permit and therefore are not repeated.

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

A. General Testing Requirements

None of the applicable regulations requires performance testing; therefore, this permit does not contain any conditions to require specific testing for any sources. The permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general 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

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

The process mixers (Emission Unit ID Nos. MT01 through MT08) are relatively enclosed. These sources are subject to Georgia Rules (b) and (d) but are not likely to violate these rules because particulate matter emissions and visible emissions from the mixers are negligible. The organic VOC and HAP used have insignificant levels

of opacity and particulate matter emissions and the likelihood of a violation of Rules (b) and (e) are very minimal. Therefore, no monitoring is required for Opacity or Particulate Matter listed in Condition Nos. 3.4.1 and 3.4.2.

C. Record Keeping and Reporting Requirements

None Applicable

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

Requirements for the maintenance of all records for a period of five years and for the prompt reporting of excessive emissions from process malfunctions or improper maintenance are included (Condition Nos. 6.1.1, 6.1.2, and 6.1.3).

The Permittee is required in Condition 6.1.4 to submit a semiannual report. This report should contain information on deviations (described in exceedences) which occurred during the reporting period. The required information is enumerated in the Condition. Condition 6.1.5 requires any analysis or sampling records to be kept. All records should be maintained for at least five years according to Condition 6.1.6.

Condition No. 6.1.7 details deviations which are to be included in the semiannual report required in Condition No. 6.1.4. Exceedances would occur if the facility exceeded any of the VOC limits specified in Condition Nos. 2.1.1 and 3.2.1 for any twelve consecutive month period and if the facility exceeded the HAP limitation specified in Condition No. 2.1.2.

B. Specific Record Keeping and Reporting Requirements

Condition No. 6.2.1 requires the facility to maintain monthly usage records of all VOC containing materials utilized at the facility. Condition No. 6.2.2 requires the facility to calculate the monthly VOC emissions per Division Guidelines and notify the Division if the VOC emissions for any month exceed 8.33 tons. The facility is utilizing option No. 3 of the Division's calculation memorandum dated May 8, 1998. Option No. 3 allows the source to claim that 1.5 percent of the VOC product from the solvent is emitted from the mixing operations. The TANKS 3 program or AP-42 emission factors (Chapter 7.1.3.1) should be used to determine the emissions from the storage tanks (breathing losses, filling, and working losses) and the emissions from the filling of material from the mixers to the product containers. Condition No. 6.2.3 requires the facility to calculate the twelve month rolling total VOC emissions for each month and notify the Division when the VOC emissions exceed 100 tons during any consecutive twelve month period. Notification must be submitted within 15 days. These conditions are already in the SIP permit as condition Nos. 12, 13, and 14.

Condition No. 6.2.4 requires the facility to maintain monthly usage records of all VOC containing materials utilized at the mixer M08. Condition No. 6.2.5 requires the facility to calculate the monthly VOC emissions for the mixer M08 per Division Guidelines and notify the Division if the VOC emissions for any month exceed 1.25 tons. As above, the facility is utilizing option No. 3 of the Division's calculation memorandum dated May 8, 1998. Option No. 3 allows the source to claim that 1.5 percent of the VOC product from the solvent is emitted

from the mixing operations. The TANKS 3 program or AP-42 emission factors (Chapter 7.1.3.1) should be used to determine the emissions from the storage tanks (breathing losses, filling, and working losses) and the emissions from the filling of material from the mixers to the product containers. Condition No. 6.2.6 requires the facility to calculate the twelve month rolling total VOC emissions for mixer M08 for each month and notify the Division when the VOC emissions exceed 15 tons during any consecutive twelve month period. Notification must be submitted within 15 days. These conditions are already in the SIP permit as condition Nos. 15, 16, and 17.

Condition No. 6.2.7 requires the facility to maintain monthly usage records of all HAP containing materials utilized at the facility. Condition No. 6.2.8 requires the facility to calculate the monthly Facility wide HAP emissions per Division Guidelines and notify the Division if the HAP emissions for any month exceed 0.83 tons for each individual HAP and 2.08 tons for combined HAP. The facility is utilizing option No. 3 of the Division's calculation memorandum dated May 8, 1998. Option No. 3 allows the source to claim that 1.5 percent of the HAP product from the solvent is emitted from the mixing operations. The TANKS 3 program or AP-42 emission factors (Chapter 7.1.3.1) should be used to determine the emissions from the storage tanks (breathing losses, filling, and working losses) and the emissions from the filling of material from the mixers to the product containers. Condition No. 6.2.9 requires the facility to calculate the twelve month rolling total HAP emissions for each month and notify the Division when the HAP emissions exceed 10 tons of each HAP and 25 tons for combined HAP during any consecutive twelve month period. Notification must be submitted within 15 days. These conditions are already in the SIP permit as condition Nos. 18, 19, and 20.

Condition No. 6.2.10 requires the facility to keep permanent documentation that the storage tanks (Emission Unit ID Nos. ST01, ST02, ST03, ST04, ST05, ST06, ST07, ST08, ST09, ST10, ST11, ST13, and ST14) are equipped with submerged fill pipes in order to verify compliance with Rule (vv).

Condition No. 6.2.11 requires the facility to perform an inspection each shift and maintain a suitable log verifying that Emission Unit ID Nos. M001, M002, M003, M004, M005, M006, M007, and M008 are in compliance with Condition No. 3.4.4 [Rule (ccc)]. This inspection shall ensure that the tank openings for the non-reactive chemical mixers are covered except for periods when operator access is necessary, that the fill pipes or drop tubes are in proper working order, any cleaners utilized during the shift for use in and around the mixers are detergents or non-VOC containing cleaners (unless cleanup cannot be accomplished without the use of a VOC containing cleaner), and that all waste solvent is stored in closed containers (unless demonstrated to be a safety hazard) and are disposed of in a suitable manner to the Division. The Permittee shall also keep permanent documentation that the mixers are equipped with drop tubes, fill pipes, or low clearance equipment design, and that the mixers are equipped with covers which completely cover the tank except for an opening no larger than necessary to allow for the safe clearance of the mixer shaft. The Permittee shall notify the Division in writing if items (a) through (d) of Condition No. 3.4.4 are not being met. All notification must be submitted to the Division within 15 days.

VII. Specific Requirements

A. Operational Flexibility

The facility has not requested any operational flexibility in their Title V application. There are no new rules, regulations, or work practices that will be applicable to this source for the purpose of operational flexibility

B. Alternative Requirements

There are no alternative requirements indicated.

C. Insignificant Activities

The following is a list of the facility's insignificant activities as detailed in Section 4.10 of the Title V application:

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|--|--|-----------------|
| Combustion Equipment | 1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel. | 1 |
| | 2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:: i) less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. ii) less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. iii) less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types) | |
| | 3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5). | |
| | 4. Stationary engines burning: i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators; ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year. | |
| | | |
| Trade Operations | 1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year. | 1 |
| Maintenance, Cleaning, and Housekeeping | 1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively. | |
| | 2. Portable blast-cleaning equipment. | |
| | 3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes. | |
| | 4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent. | 1 |
| | 5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning. | 1 |

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|------------------------------------|---|----------|
| | 6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners. | |
| | 7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners. | |
| Laboratories and Testing | 1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis. | 1 |
| | 2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility. | |
| Industrial Operations | 1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year. | |
| | 2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: <ul style="list-style-type: none"> <li data-bbox="553 758 1305 821">i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts. <li data-bbox="553 831 1240 863">ii) Porcelain enameling furnaces or porcelain enameling drying ovens. <li data-bbox="553 873 878 905">iii) Kilns for firing ceramic ware. <li data-bbox="553 915 1344 1041">iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds. <li data-bbox="553 1052 959 1083">v) Bakery ovens and confection cookers. | |
| | 3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: <ul style="list-style-type: none"> <li data-bbox="521 1209 886 1241">i) Activity is performed indoors; & <li data-bbox="521 1251 1243 1283">ii) No significant fugitive particulate emissions enter the environment; & <li data-bbox="521 1293 1065 1325">iii) No visible emissions enter the outdoor atmosphere. | 1 |
| | 4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche). | |
| | 5. Grain, food, or mineral extrusion processes | |
| | 6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds. | |
| | 7. Equipment for the mining and screening of uncrushed native sand and gravel. | |
| | 8. Ozonization process or process equipment. | |
| | 9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system. | |
| | 10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. | |
| Storage Tanks and Equipment | 1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored. | |

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|----------|---|----------------|
| | 2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid. | |
| | 4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | 1 |
| | 5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons. | 100 |
| | 7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia). | 1 ¹ |

1 Sulfuric acid above ground storage tank (Emission Unit ID No. AT01)

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

| Description of Emission Units / Activities | Quantity |
|---|----------|
| Sulfuric Acid Process Mixers (Emission Unit ID Nos. SM01, SM02, and SM03) | 3 |
| Maintenance Shop | 1 |
| Forklifts | > 1 |
| Sulfuric Acid Bag and Box Lines | 2 |

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

| Description of Fuel Burning Equipment | Number of Units |
|--|-----------------|
| Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG. | |
| Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG. | 5 |
| Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less. | |

D. Temporary Sources

There are no temporary sources indicated.

E. Short-Term Activities

The facility has not indicated any short-term activities.

TITLE V APPLICATION REVIEW

F. Compliance Schedule/Progress Reports

The Division's files does not indicate that there are any compliance issues with this facility.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

The facility has not indicated applicability to the acid rain requirements.

I. Prevention of Accidental Releases

The facility has not indicated applicability per §12.10 of the Title V Permit Application No. TV-11445.

J. Stratospheric Ozone Protection Requirements

The facility has indicated that they have equipment which utilizes CFC's, HCFC's, or other ozone depleting substances listed in 40 CFR Part 82. The facility does not contain any air conditioning units with a refrigerant charge greater than 50 pounds each.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions

All conditions have been covered elsewhere in the review.

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.

TITLE V APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft Permit No. 2851-121-0715-V-03-0

| Program | Review Engineers | Dates | Review Managers | Dates |
|----------|------------------|-------|-----------------|-------|
| SSPP/ASU | | | | |
| SSCP/ASU | | | | |
| ISMP | | | | |
| TOXICS | | | | |

Stationary Source Permitting Program Manager

Date

Addendum to Narrative

The facility had several comments concerning the draft Part 70 Operating Permit No. 2851-121-0715-V-03-0. No public comments or comments from USEPA were received concerning draft Part 70 Operating Permit No. 2851-121-0715-V-03-0. The facility's comments (see facility letter dated October 19, 2000) were submitted by Mr. Mark Helminiak (Environmental Compliance Manager for Scholle Corporation) on October 20, 2000, and are each specified and discussed below individually.

1. The facility had commented that Condition No. 6.2.10 referenced six storage tanks when the permit specifies thirteen storage tanks. This is an obvious typographical error and will be corrected by the Division.
2. The facility commented that the requirement in Condition No. 6.2.11 to conduct and record inspections of the eight mixers at least once per shift is excessive. The facility is requesting that the above requirement be modified to once per day as sufficient to provide a reasonable assurance of compliance with Georgia Rule (ccc) "VOC Emissions from Bulk Mixing Tanks." The facility is complying with Rule (ccc) and under normal operation will continue to comply with the rule, therefore, the Division will modify Condition No. 6.2.11 to require the inspection only once per calendar day.
3. The facility requested clarification regarding what specific information is required to be submitted as part of the annual compliance certification. The facility states that the annual compliance certification template form provided by the Division does not require the same level of detail as Condition No. 8.14.1. The Division concludes that no changes need to be made to Condition No. 8.14.1 and that the facility is requesting a change in the compliance template provided by the Division. Any changes to the compliance template will not be handled through the issuance of this permit.
4. The facility commented that Attachment B "Insignificant Activities Checklist" does not include the "greater than" designation for several of the source categories as specified in Application No. 11445. This is a minor change and the Division will correct the errors to Attachment B.

The above changes will be made to draft Georgia Air Quality Permit No. 2851-121-0715-V-03-0 before final permit issuance.