

TITLE V APPLICATION REVIEW

Facility Name: Universal-Rundle
City: Union Point
County: Greene
AIRS #: 04-13-133-00003

Application #: TV- 9176

Date Application Received: Oct. 22, 1996
Date Application Deemed
Administratively Complete: April 22, 1997
Date of Draft Permit: June 29, 1998
Permit No: 3088-133-0003-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Alan Leake	Sam Buckles
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TOXICS	--	--

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V 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 Universal-Rundle 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: Universal-Rundle
2. Parent/Holding Company Name
Nortek, Inc.
3. Previous and/or Other Name(s)
None
4. Facility Location
1 Industrial Park, Union Point, Georgia
5. Attainment or Non-attainment Area Location
Attainment
6. Class I Area Impacts
None

B. Site Determination

There are no other facilities which 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
3079-066-1234-0	May 3, 1974		✓
3088-066-10793	July 5, 1991	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3088-066-10793	An application was sent in to update the file at the request of EPD. VOC recordkeeping was required in this permit.

D. Process Description

1. SIC Code(s)

Major - 3088
Other - none

2. Description of Product(s)

This facility produces polyester resin plastics products such as shower stalls and bathtubs.

3. Overall Facility Process Description

This facility manufactures fiberglass bath units and plastic bath wall surrounds. The bath units are made by one of two processes, gel coat production or acrylic production. The wall surrounds are vacuum formed using plastic sheets. These processes emit pollutants such as styrene and methyl ethyl ketone.

In the gel coat production, gel coat and a catalyst are sprayed onto waxed molds in gel booths. A mixture of resin and additives are pumped to spray lines and sprayed onto molds along with fiberglass and catalyst. After curing, the unit is pulled from the mold and moved to grind booths where they are trimmed to a uniform size.

In acrylic production, acrylic sheets are heated and vacuum formed into the shape of a unit. The formed sheets are loaded onto a conveyor and sprayed with resin, catalyst and fiberglass. When the units are cured, they are removed from the conveyor and moved to the grind booths. They are then shipped to the warehouse.

The plastic bath wall surrounds are made by taking the plastic sheets and heating them. They are then vacuum formed into sectional wall surrounds. The parts are then trimmed and sent to the warehouse for shipping.

4. Overall Process Flow Diagram (optional)

None

E. Regulatory Status

1. PSD/NSR

None

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?		
		Major Source Status	Major Source requesting SM Status	Non-Major Source Status
PM	yes			✓
PM ₁₀	yes			✓
SO ₂	no			
VOC	yes	✓		
NO _x	yes			✓
CO	yes			✓
TRS	no			
H ₂ S	no			
Individual HAP	yes	✓		
Total HAPs	yes	✓		

3. MACT Standards

This facility will be subject to the MACT for Reinforced Plastic Composites Production when it becomes promulgated.

4. Program Applicability

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

II. Facility Wide Requirements

A. Emission and Operating Caps:

None

B. Applicable Rules and Regulations:

None

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C. Compliance Status

In compliance

D. Operational Flexibility

None

E. Permit Conditions

The facility has a condition in the permit that requires recordkeeping of the daily usage of all materials containing volatile organic compounds. This condition will not be changed and will be in the Title V permit.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility has three heaters that burn natural gas and are rated at 10 million Btu per hour heat input. These heaters will be subject to Rule 391-3-1-.02(2)(d). See the above process description concerning the other listed equipment.

B. Equipment List for the Process

Emission Unit ID No.	Emission Unit Description	Applicable Permit Condition No.(s)	Applicable Requirement/Standard	APCD ID No.(s)	APCD Description
EU04	Space heater	3.4.1, 3.4.2	391-3-1-.02(d)	NA	NA
EU05	Space heater	3.4.1, 3.4.2	391-3-1-.02(d)	NA	NA
EU06	Space heater	3.4.1, 3.4.2	391-3-1-.02(d)	NA	NA
EU01	Gelcoat Spray Booth Area	3.5.2, 5.2.2, 6.1.3	NA	CD01	Fiberglass Air Filters
EU02	Laminate Booth Area	6.1.3	NA	NA	NA
EU03	Backing Mat Application	6.1.3	NA	NA	NA

C. Equipment & Rule Applicability

- Emission and Operating Caps - none
- Applicable Rules and Regulations -

Rules and Regulations Assessment: The space heaters are subject to PM and opacity standards of Georgia Rule 391-3-1-.02(d) because the heaters combust natural gas.

Emission and Operating Standards: none

D. Compliance Status

In compliance

E. Operational Flexibility

None

F. Permit Conditions

A condition will be in the permit that will state that the heaters will be subject to Rule 391-3-1-.02(2)(d).

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

A. General Testing Requirements

General conditions requiring notification and submission of a test plan for any source test and specifying test methods to be used are included.

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

B. Specific Monitoring Requirements

The gelcoat spray booth utilizes a fiberglass filter to control particulate matter emissions. A condition requiring that the Permittee maintain a log indicating the date and time of each gelcoat spray booth filter change is included.

The facility has three natural gas-fired heaters rated at 10 MMBtu/hr heat input, which are subject to Georgia Rule (d). Particulate Matter emissions and opacity from combustion of natural gas is insignificant and likelihood of violation is minimal, so no monitoring is required.

VI. Other Record Keeping and Reporting Requirements

B. Specific Recordkeeping and Reporting Requirements

The permit contains a condition requiring that usage records be kept of all materials containing volatile organic compounds.

II. Specific Requirements

A. Operational Flexibility

None

B. Alternative Requirements

None

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C. Insignificant Activities

- refer to §4.10 of the Title V permit application

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

None

H. Acid Rain Requirements

none

I. Prevention of Accidental Releases

None

J. Stratospheric Ozone Protection Requirements

None

K. Pollution Prevention

None

L. Specific Conditions

None

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.

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Closing Block: We have reviewed and recommend issuance of draft Permit No. 3088-133-0003-V-01-0

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

Stationary Source Permitting Program Manager

Date