

Facility Name: **MTI Whirlpools, Inc.**
 City: Sugar Hill
 County: Gwinnett County
 AIRS #: 04-13-135-00170

Application #: TV-14129
 Date SIP Application Received: N/A
 Date Title V Application Received: Memo submitted by SSCP on November 14, 2002
 Date of Draft Permit: July 1, 2003
 Permit No: 3088-135-0170-V-02-1

Program	Review Engineers	Review Managers
SSPP	Joe Gorski	Matthew Page
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and/or draft/proposed operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (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 amendment is to identify state and federal air requirements applicable to the modification/construction to be performed at MTI Whirlpools, Inc. and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It initially describes the facility receiving the permit amendment, 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 amendment 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. Existing Permits**

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3088-135-0170-V-02-0	April 17, 2003	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3088-135-0170-V-02-0	Administrative Amendment for facility name change and change of ownership.

B. Regulatory Status**1. PSD/NSR**

The facility is major source under NSR regulations for its potential to emit more than 50 tons per year (TPY) of volatile organic compounds (VOC) in a serious ozone nonattainment area. However, the facility is currently subject to an annual VOC limit of 40 tons from Building 1 (SB01), Building 2 (SB02), and TK01. The facility is also subject to an annual VOC limit of 30 tons from Building 3 (SB03) and TK02. These annual VOC limits serve to exempt the facility from non-attainment new source review.

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	Yes			✓
PM ₁₀	Yes			✓
SO ₂	N/A			
VOC	Yes	✓		
NO _x	N/A			
CO	N/A			
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

The Stationary Source Compliance Program submitted a request to modify Condition No. 6.2.7 on behalf of MTI Whirlpools, Inc. An application was not submitted by the facility. Condition 6.2.7 was modified to decrease the reporting frequency of nitrogen oxides and VOCs from once per calendar year, to once per calendar year if the facility emits nitrogen oxides or VOCs equal to, or in excess of, 25 tons during any calendar year.

B. Emissions Change

The above modification to Georgia Air Quality Permit No. 3086-247-0025-V-02-0 will not result in an increase or decrease in facility emissions.

C. PSD/NSR Applicability

This modification does not subject the facility to any PSD/NSR or non-attainment new source review determinations.

III. Facility Wide Requirements**A. Emission and Operating Caps:**

This modification does not involve any new caps or limits on emissions, hours of operation, etc.

B. Applicable Rules and Regulations

The facility will not be subject to any additional rules or regulations as a result of this amendment.

C. Compliance Status

MTI Whirlpools, Inc. is currently operating in compliance with all the provisions of Georgia Air Quality Permit 3088-135-0170-V-02-0.

D. Operational Flexibility

The facility did not request additional operational flexibility through this modification.

E. Permit Conditions

This amendment does not modify any part of Section 2.0 of Georgia Air Quality Permit No. 3088-135-0170-V-02-0.

IV. Regulated Equipment Requirements

The equipment regulated by Georgia Air Quality Permit No. 3088-135-0170-V-02-0 has not been modified in any way as a result of this amendment.

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

There are not any new or modified testing (and associated record keeping and reporting) requirements for the facility's equipment groups or individual pieces of equipment as a result of this amendment.

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

There are not any new or modified monitoring (and associated record keeping and reporting) requirements for the facility's equipment groups or individual pieces of equipment as a result of this amendment.

VII. Other Record Keeping and Reporting Requirements

All of the record-keeping provisions in the current operating permit for MTI Whirlpools, Inc., Georgia Air Quality Permit No. 3088-135-0170-V-02-0, are not modified by this amendment. However, the facility's reporting frequency for nitrogen oxide and/or VOC emissions is modified from once per calendar year to once per calendar year only if nitrogen oxide and/or VOC emissions equal or exceed 25 tons during any calendar year.

VIII. Specific Requirements

This amendment does not address any other specific requirements other than those described above.

Addendum to Narrative

EPD issued draft Title V Permit Amendment No. 3088-135-0170-V-02-1 for the MTI Whirlpools, Inc. plastic tub and sink manufacturing facility in Sugar Hill, Georgia on July 1, 2003. The public notice for this permit was published in The Gwinnett Daily Post on July 13, 2003. The public comment period expired August 12, 2003. The Division did not receive any comments from the facility, EPA, or public regarding this permit amendment.