

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

Application #: TV-15865
 Date Application Received: November 30, 2004
 Permit No: 3088-135-0170-V-03-0

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 **MTI Whirlpools** 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:

MTI Whirlpools, Inc.

2. Parent/Holding Company Name

MTI Whirlpools, Inc.

3. Previous and/or Other Name(s)

pka: Mr. Tubs, Inc.

4. Facility Location

670 North Price Road
Sugar Hill, Georgia 30518
Gwinnett County

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in the Atlanta ozone non-attainment area.

6. Class I Area Impacts

The facility is located within 200 km of the Cohutta Wilderness Area, a Class I area.

B. Site Determination

The site is comprised of three separate buildings; two of which are adjacent with the third located across the street. All of the buildings are considered to be contiguous, adjacent, and/or 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
3088-135-0170-V-02-1	September 8, 2003	An amendment to decrease the reporting frequency of VOC and NO _x emissions.
3088-135-0170-V-02-0	April 17, 2003/ May 10, 2000	Initial Title V Permit. The permit counter is two because the facility underwent a name and ownership change.
3088-135-0170-V-01-0	May 10, 2000	Initial Title V Permit.

D. Process Description

1. SIC Codes(s)

3088

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures fiberglass reinforced plastic whirlpool tubs, bathroom basins, and kitchen sinks.

3. Overall Facility Process Description

MTI Whirlpools consists of three production buildings identified as Building Nos. 1, 2, and 3 where fiberglass-resin reinforced plastic whirlpool tubs, bathroom basins, and kitchen sinks are produced. The bathroom basins and kitchen sinks are made in Building Nos. 1 and 2 while the whirlpool tubs are fabricated in Building No. 3, across the street.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility is major source under NSR regulations for its potential to emit more than 25 tons per year (tpy) of volatile organic compounds (VOC) in a severe ozone non-attainment area. The facility has accepted VOC limits of 40-tpy on Emission Unit ID Nos. SB01, SB02, and TK01 in order to avoid non-attainment NSR. The facility has also accepted VOC limits of 30-tpy on Emission Unit ID Nos. SB03 and TK02 in order to avoid non-attainment NSR.

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	n/a			
VOC	✓	✓		
NO _x	n/a			
CO	n/a			
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. MTI Whirlpools is an "existing source" with respect to the rule, due to its being constructed prior to August 2, 2001, which was the proposal date for Subpart WWWW. For an existing source, the rule requires compliance by April 21, 2006.

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:

None applicable.

B. Applicable Rules and Regulations

The facility is subject to 40 CFR 63 Subpart WWWW, "Reinforced Plastic Composites Production," as described in detail in Section IV.C.

C. Compliance Status

MTI Whirlpools is currently operating under a NOV because the facility submitted their Title V Renewal Application late. The NOV will be satisfied upon the issuance of the Title V Renewal Permit.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition No. 2.2.1 is a new condition that requires the facility to comply with all applicable parts of the General Provisions of 40 CFR Part 63, Subpart A.

Condition No. 2.2.2 is a new condition that requires the facility to comply with all applicable provisions of 40 CFR 63 Subpart WWWW, "NESHAP for Reinforced Plastic Composites Production."

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 3088-135-0170-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
SB01	Spray booth, Bldg. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63, Subpart WWWW	2.2.1, 2.2.2, 3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.5.1, 6.2.1 through 6.2.20	FT01	Fiberglass Filter
SB02	Spray booth, Bldg. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63, Subpart WWWW	2.2.1, 2.2.2, 3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.5.1, 6.2.1 through 6.2.20	FT02	Fiberglass Filter
SB03	Spray booth, Bldg. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63, Subpart WWWW	2.2.1, 2.2.2, 3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.5.1, 6.2.1 through 6.2.20	FT03	Fiberglass Filter
TK01	6,000-gallon resin storage tank for Bldgs. 1 and 2	391-3-1-.02(2)(vv)	3.2.1, 3.4.3, 6.2.16, 6.2.20	N/A	None
TK02	10,000-gallon resin storage tank for Bldg. 3	391-3-1-.02(2)(vv)	3.2.2, 3.4.3, 6.2.16, 6.2.20	N/A	None

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3088-135-0170-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In addition to the rules specified in Permit No. 3088-135-0170-V-01-0, MTI Whirlpools is subject to 40 CFR 63, Subpart WWWW, "Reinforced Plastic Composites Production", effective April 21, 2006.

40 CFR 63 Subpart WWWW, "Reinforced Plastic Composites Production", applies to open molding, closed molding, and storage operations at MTI Whirlpools using styrene-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. The NESHAP provides that, 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. MTI Whirlpools 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 (and 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).

The facility is subject to the requirements of Georgia Air Quality Rule 391-3-1-.02(2)(tt), "VOC Emissions from Major Sources". One requirement of the existing VOC RACT is a limit of 38% VOC in styrene. The Division has determined that the resin and gel coat styrene content limits of the Reinforced Plastic Composites MACT are equivalent to this existing RACT limit. The main pollutant emitted by the facility is styrene, which is classified as both a HAP and a VOC. Therefore, the Division has determined that MACT is equivalent to RACT as it relates to the resin and gel coat styrene content limit and will be required to comply with 40 CFR Subpart WWWW on April 21, 2006.

D. Compliance Status

MTI Whirlpools is currently operating under a NOV because the facility submitted their Title V Renewal Application late. The NOV will be satisfied upon the issuance of the Title V Renewal Permit.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition Nos. 3.2.1 and 3.2.2 is an existing condition that establishes VOC emission rate limits for two process groups at the facility, which ensures that the facility remains below the threshold which requires review under non-attainment NSR. These two sources account for a majority of VOC emissions from the facility.

Condition 3.3.1 is a new condition that describes the applicable HAP emission limits (or HAP content limits) as specified by the Reinforced Plastic Composites NESHAP for specific facility operations.

Condition 3.3.2 is a new condition that describes the applicable work practice standards as specified by the Reinforced Plastic Composites NESHAP.

Condition 3.3.3 is a new condition that lists the operations that are excluded from applicability to the Reinforced Plastic Composites NESHAP.

Condition 3.4.1 is an existing condition; formerly Condition No. 3.4.2, which establishes SIP PM emission standards [Georgia Rule (e)] for process units with PM emissions such as fiberglass resin spray and shell grinding/finishing processes.

Condition 3.4.2 is an existing condition; formerly Condition No. 3.4.3, which establishes a SIP visible emission standard [Georgia Rule (b)] for process emission units that also have SIP PM emission standards.

Condition 3.4.3 is an existing condition; formerly Condition No. 3.4.7, which specifies a RACT equivalent requirement for the submerged filling of resin tanks from any delivery vessel [Georgia Rule (vv)].

Condition 3.4.4 specifies an existing RACT requirement for the use of the fiberglass-resin coating guns at the facility.

Condition 3.4.5 specifies an existing RACT requirement for the use of the containers of VOC compounds at the facility.

Condition 3.4.6 specifies an existing RACT requirement for closed storage of VOC-laden materials when they are not in use.

Condition 3.4.7 specifies an existing RACT requirement limiting the amount of styrene in the resins used for the spray coating of acrylic shells. This condition is effective until April 21, 2006, at which point the conditions specifying the provisions of the Reinforced Plastic Composites Production NESHAP will take effect.

Condition 3.5.1 establishes a schedule to change the overspray filters serving the coating spray booths. Proper maintenance of the filter control system would reduce PM emissions from overspray.

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 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

The facility has chop booths (Emission Unit ID Nos. SB01, SB02 and SB03) located in each production building (Building Nos. 1, 2 and 3). In these booths a mixture of fiberglass strands and resin/catalyst combination is sprayed onto various acrylic shells. Fiber exhaust filters control the particulate matter emissions from the coating overspray. The booths are subject to Georgia Rules (b) and (e). Particulate matter and visible emissions from the coating operations are very unlikely to exceed their respective Rule (e) and (b) limitations, as the booths exhaust ambient air at atmospheric temperature and pressure, and the blockage/caking of the filters by PM increases their capture efficiencies. Monitoring for these sources consists of performing filter changes once per week of operation, as specified in Condition No. 3.5.1. The Permittee is required to keep a log of filter changes, and any failure to adhere to the filter change schedule is to be reported as an excursion in the facility's semiannual report.

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

Condition Nos. 6.2.1 through 6.2.13 describe the emission calculation, notification and reporting requirements of all materials that contain HAP in order to prove compliance with the HAP emission limits of the Reinforced Plastic Composites NESHAP specified in Condition Nos. 3.3.1 and 3.3.2.

Condition No. 6.2.1 describes how the facility can determine the HAP content of materials used.

Condition No. 6.2.2 details how the facility can demonstrate compliance with the NESHAP requirements by calculating HAP emission factors, HAP emission factor averaging, or HAP content limits.

Condition No. 6.2.3 requires the facility maintain records of all resin and gel coat materials used at the facility.

Condition No. 6.2.5 describes the facility's option to avoid the requirements of Condition No. 6.2.4 (records of HAP content of resins and gel coats used) by an initial demonstration that the materials used comply the NESHAP's HAP emission or content limits.

Condition No. 6.2.6 describes how long the facility must maintain records and gives examples of what types of media can be used to store them.

Initial compliance requirements of the NESHAP (HAP emission limits and work practice standards) are detailed by Condition No. 6.2.7.

Condition No. 6.2.8 describes the notifications and reports the facility must submit to the Division as required by the NESHAP.

Condition Nos. 6.2.9 through 6.2.13 describes the notifications and reports the facility must submit to the Division as required by the NESHAP.

Condition No. 6.2.14 requires the facility to keep a record of the date and time of each filter replacement as mandated by Condition No. 3.5.1.

The facility has two VOC emissions caps. One confirmed the facility as a minor source when the facility only had Building Nos. 1 and 2 as VOC emission sources. The other confirmed that the addition of Building No.3 was not a major modification under NAA/NSR and SIP rules thus not subject to BACT per 391-3-1-.03(8)13. In order to show compliance with each of these two emission limits, Condition No. 6.2.15 requires the Permittee to maintain separate monthly usage records of the VOC-containing materials used by the processes regulated by each of the two VOC annual emissions caps. Condition Nos. 6.2.17, 6.2.18, and 6.2.19 require and instruct the Permittee to use these records to calculate corresponding monthly totals and twelve-month rolling totals of VOC emissions for each month in the reporting period.

Condition No. 6.2.16 requires the Permittee to maintain monthly usage of all materials containing listed HAP compounds.

Condition No. 6.2.20 requires the Permittee to use these records to calculate monthly plant-wide total HAP emissions.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

There are no new alternative requirements requested by the facility under Rule 391-3-1-.03(10)(d)8.

C. Insignificant Activities

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

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

MTI Whirlpools is currently operating under a NOV because the facility submitted their Title V Renewal Application late. The NOV will be satisfied upon the issuance of the Title V Renewal Permit.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they are subject to Title VI.

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

EPD issued draft Title V Renewal Permit 3088-135-0170-V-03-0 for the MTI Whirlpools, Inc. reinforced fiberglass bath products manufacturing facility in Sugar Hill, Georgia on August 8, 2005. The public notice for this permit was published in the Gwinnett Daily Post on August 18, 2005. The public comment period expired September 17, 2005. No comments were received.