

Facility Name: **AGCO, Inc.**

City: Norcross

County: Gwinnett

AIRS #: 04-13-135-00239

Application #: 16200

Date SIP Application Received: May 5, 2005

Date Title V Application Received: N/A

Permit No: 3088-135-0239-V-01-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. 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 issued pursuant to: (1) Sections 391-3-1-.03(1) and 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. 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 comment period 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.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3088-135-0239-V-01-0	April 17, 2003		✓

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

Based on the narrative for TV application No. 13326, AGCO, Inc. accepted a limit of 49 tons per year on VOC/HAP emissions in order to avoid becoming subject to non-attainment NSR regulations since it is located in a non-attainment area.

AGCO will continue to be subject to Georgia Rule 391-3-1-.02(2)(tt), "VOC Emissions from Major Sources," because the plant has the potential to emit more than 25 tons of VOC's per year and it is located in a non-attainment county. AGCO's existing RACT conditions still apply to the facility.

**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	✓			✓
PM <sub>10</sub>	✓			✓
SO <sub>2</sub>	N/A			
VOC	✓	✓		
NO <sub>x</sub>	N/A			
CO	N/A			
TRS	N/A			
H <sub>2</sub> S	N/A			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

The facility is a major source for hazardous air pollutants (HAP) with a combined PTE greater than 25 tons per year and an individual PTE of greater than 10 tons per year for the following pollutant(s): styrene.

The facility is, therefore, subject to the following promulgated MACT standards:

40 CFR Part 63 Subpart A, "General Provisions"

40 CFR Part 63 Subpart WWWW, "Reinforced Plastic Composites Production"

The facility is subject to the MACT, 40 CFR Part 63 Subpart WWWW, "Reinforced Plastic Composites Production", promulgated on April 21, 2003. AGCO 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

## **II. Proposed Modification**

### **A. Description of Modification**

This facility is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW, and must comply with the NESHAP by April 21, 2006. The purpose of this amendment is to add NESHAP Subpart WWWW rules to the existing permit. This is being done through Georgia Rule 391-3-1-.03(10)(e)6, "Reopening for Cause."

### **B. Emissions Change**

There will be no emissions changes associated with this modification.

### **C. PSD/NSR Applicability**

The proposed amendment would not be classified as a major modification for NSR since there would be no change in emissions.

**III. Facility Wide Requirements**

A. Emission and Operating Caps:

The facility has an existing facility wide VOC emissions cap of 49 tons per any twelve consecutive month period. This emission limit was imposed in order to avoid non-attainment NSR applicability.

B. Applicable Rules and Regulations

The facility is subject to 40 CFR 63 Subpart WWWW, “Reinforced Plastic Composites Production.”

C. Compliance Status

No noncompliance issues exist.

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.”

#### **IV. Regulated Equipment Requirements**

##### **A. Brief Process Description**

The major components of this facility include the gel coat spray, resin glass booth spray, fiberglass resin, cure tunnel, conveyor belt, hand layup area, panel saw, PVC plumbing installation, solvent cleaning, mold preparation and woodworking. The primary pollutant emitted by the facility is styrene, which is both a volatile organic compound and a hazardous air pollutant.

##### Process Groups EP01 and FE01: Production of Tubs and Vanities

Gel coats units are manufactured using molds, which are themselves constructed using gel coat and resin materials. Once the gel coat has cleared, the molds are sent to the mix/pour station. Then a mixture of styrene resin, catalyst and calcium carbonate is poured onto the gel coated molds. Finally, these molds are placed on the assembly line for curing. The cured product is removed from the molds and it is sent to the grind booth for removal of excess matrix. The molds are sent back to the first step for reuse. The final product is inspected and stored onsite until it is shipped.

##### Process Groups EP04 and FE03: Production of Fiberglass Spas and Shower Basins

The prepared molds are sprayed with a mixture of resin and chopped fiberglass. The molds are sent to a cure tunnel. Once the product is cured, it is removed from the mold and sent to the hand layup area. During the hand layup process, resin and chopped glass are manually applied to the product to build an edge on the basin. Most shower basins and some of the spas require hand layup. After the hand layup area, the product is inspected and stored in the warehouse until it is shipped.

##### Process Groups FE02 and FE04: Production of Solid Surface Marble Products and Vanities

The solid surface molds are prepped and are placed on the conveyor belt. A mixture of resin, catalyst and aluminum trihydrate powder is mixed and poured onto the solid surface molds. Once the matrix is cured, the product is removed from the molds and sent to the surface sander and/or panel saw. The product is cut according to customer specifications by using a variety of adhesives. The product is inspected and stored onsite until it is shipped to the customer.

Process units EP01, EP04, FE01, FE02, FE03, FE04 are subject to NESHAP Subpart WWWW.

TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

B. Equipment List for the Process

Equipment/Process List for AGCO, Inc.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EP01	Gel Coat Booth	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.6, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10-6.2.21	GF01	Gel Coat Booth Filters
EP04	Resin Glass Booth	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10- 6.2.21	GF02	Glass Booth Filters
FE01	Mixing and Pouring of Resin Matrix	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.4.7, 3.5.1, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10-6.2.21	None	None
FE02	Mixing and Pouring of Solid Surface Resin Matrix	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.4.7, 3.5.1, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10-6.2.21	None	None
FE03	Hand Layup of Shower Basins and Spas	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.4.7, 3.5.1, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10-6.2.21	None	None
FE04	Cleaning Unit	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, 2.2.1, 2.2.2, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 5.3.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.10-6.2.21	None	None

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3088-135-0239-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. 3088-135-0239-V-01-0, AGCO 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, mixing, and storage operations at AGCO using styrene-containing materials. The NESHAP requires existing 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 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 to use resin matrix with reduced styrene content in Emission Units EP01, EP04, FE01, FE02, and FE03. According to the RACT, the facility will not use any resins with styrene content greater than 42% in Emission Unit EP01, 38% in Emission Unit EP04, and 34% in Emission Unit FE01, FE02, and FE03. 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.

D. Compliance Status

No noncompliance issues exist.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.3.1 has been deleted because it pertains to Section 112(j). Section 112(j) no longer applies since NESHAP 40 CFR 63 Subpart WWWW is promulgated.

Condition 3.3.2 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 3.3.3 is a new condition that describes the applicable work practice standards as specified by the Reinforced Plastic Composites NESHAP.

Condition 3.3.4 is a new condition that lists the operations that are excluded from applicability to the Reinforced Plastic Composites NESHAP.

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

- A. Individual Equipment: See Equipment Group below.
- B. Equipment Groups (all subject to the same test requirements): None of the applicable regulations requires performance testing; therefore, this amendment does not contain any conditions to require specific testing for any sources.

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

- A. Individual Equipment: None applicable.
- B. Equipment Groups (all subject to the same monitoring requirements): See Section VII.

## VII. Other 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 No. 6.1.7 was modified to include exceedance statements for the 12-month maximum HAP limits and compliance with the work practice standards in Table 3 of the permit.

Condition No. 6.2.7 has been deleted because it pertains to Section 112(j). Section 112(j) no longer applies since NESHAP 40 CFR 63 Subpart WWW is promulgated.

Condition Nos. 6.2.10 through 6.2.22 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. 3.3.2 and 3.3.3.

Condition No. 6.2.10 describes how the facility can determine the HAP content of materials used.

Condition No. 6.2.11 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. 6.2.12 requires the facility maintain records of all resin and gel coat materials used at the facility.

Condition No. 6.2.14 describes the facility's option to avoid the requirements of Condition No. 6.2.13 (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. 6.2.15 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. 6.2.16.

Condition No. 6.2.17 describes the notifications and reports the facility must submit to the Division as required by the NESHAP.

Condition Nos. 6.2.18 through 6.2.21 describe the notifications and reports the facility must submit to the Division as required by the NESHAP.

**VIII. Specific Requirements**

Discuss any of the following specific requirements as they apply to the modification.

- A. **Operational Flexibility**  
No operational flexibility has been added as a part of this modification.
- B. **Alternative Requirements**  
There are no alternative requirements indicated as a part of this modification.
- C. **Insignificant Activities**  
No insignificant activities have been added as part of this modification.
- D. **Temporary Sources**  
The facility has not requested to operate any temporary sources.
- E. **Short-Term Activities**  
The facility did not report any short-term activities.
- F. **Compliance Schedule/Progress Reports**  
Based on all presently available information, no compliance or progress reports are necessary.
- G. **Emissions Trading**  
The facility is not involved in any emissions trading.
- H. **Acid Rain Requirements**  
The facility is not subject to any requirements in Title IV of the Clean Air Act.
- I. **Prevention of Accidental Releases**  
The facility is not subject to the Accidental Release Prevention Program.
- J. **Stratospheric Ozone Protection Requirements**  
The standard permit condition pursuant to 40 CFR 82 Subpart F has already been included in the Title V Permit.
- K. **Pollution Prevention**  
There are no pollution prevention provisions incorporated into this Title V Permit.
- L. **Specific Conditions**  
None.

**Addendum to Narrative**

The 30-day public review started on June 21, 2006 and ended on July 21, 2006. Comments were not received by the Division.