

Facility Name: **Cottrell, Inc.**
 City: Gainesville
 County: Hall
 AIRS #: 04-13-139-00109

Application #: TV-17785
 Date Application Received: November 13, 2007
 Permit No: 3715-139-0109-V-02-0

Program	Review Engineers	Review Managers
SSPP	Katie Gregory	Eric Cornwell
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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 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 **Cottrell, Inc.** 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: Cottrell, Inc.
2. Parent/Holding Company Name: Cottrell, Inc.
3. Previous and/or Other Name(s): Not Applicable
4. Facility Location

2125 Candler Road
Gainesville, GA 30503
Hall County
5. Attainment, Non-attainment Area Location, or Contributing Area

Hall County is part of the 20 county Atlanta non-attainment area for the 8-hour ozone standard.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and 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
3715-139-0109-V-01-0	May 27, 2003	Initial Title V Permit

D. Process Description

1. SIC Codes(s)

3715

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 and coats automobile carriers.

3. Overall Facility Process Description

The automotive carriers are composed of trailers and headramps (the part of the carrier closet to the cab). Raw materials are shipped to the facility including raw steel. The saw drill shop and sheet metal shop cut holes in the steel pieces and cut pieces to the correct length. The sub assembly shop welds smaller assemblies and transfers them to the main assembly line. The facility consists of three main assembly lines. There are two trailer lines (A and B) and one headramp line. Each main assembly line consists of three operations: one line where side frames and axle assembly are joined, one line where tracks are installed, and one line where smaller parts are attached.

From the main assembly lines the carriers go to one of two sand blast booths (Source Codes BB01 and BB02). These sand blast booths are controlled by dust collection systems (Source Codes DC01 and DC02). The two dust collection systems have a particulate matter control efficiency of 99.9 percent. These sand blast booths are not considered significant emissions sources and are included in Section 4.2 of the application and Appendix B of the permit. After the sand blast booths the trailers and headramps go through one of eight paint booths (Source Codes PB01 through PB08). Touch up painting is performed in Paint detail booths (Source Codes PD01 through PD04). A primer is first applied followed by a topcoat and non-skid coating. Some parts receive a clear coat. After the surface coating operations, the trailers and headramps have hydraulic hoses, wires, and chains attached, and then go through final inspection

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 a major source in regard to PSD/NSR since the VOC emissions are limited to 224 tpy, which is greater than 100 tpy, which is the major source threshold value for Hall County. Hall County is part of the 20 county Atlanta non-attainment area for the 8-hour ozone standard.

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	Yes			X
PM ₁₀	Yes			X
SO ₂	Yes			X
VOC	Yes	X		
NO _x	Yes			X
CO	Yes			X
TRS	No			-
H ₂ S	No			-
Individual HAP	Yes		X	
Total HAPs	Yes		X	

3. MACT Standards

The facility is a minor source of HAP emissions and therefore not subject to any applicable MACT standard. The facility has a HAP emission cap of less than 10 tpy of any single HAP and/or less than 25 tpy of any combination of HAPs.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	n
Program Code 8 – Part 61 NESHAP	n
Program Code 9 - NSPS	n
Program Code M – Part 63 NESHAP	n
Program Code V – Title V	y

Regulatory Analysis**II. Facility Wide Requirements**

A. Emission and Operating Caps:

Emission and operating caps specified in Permit No. 3715-139-0109-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 3715-139-0109-V-02-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

The facility did not indicate any compliance issues in the application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

There are no conditions added, deleted or modified in this section of the Title V Operating Permit.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 3715-139-0109-V-02-0. 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
PB01	Paint Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF01	Fiberglass Filter
PB02	Paint Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF02	Fiberglass Filter
PB03	Paint Booth No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF03	Fiberglass Filter
PB04	Paint Booth No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF04	Fiberglass Filter
PB05	Paint Booth No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF05	Fiberglass Filter
PB06	Paint Booth No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF06	Fiberglass Filter
PB07	Paint Booth No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF07	Fiberglass Filter
PB08	Paint Booth No. 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF08	Fiberglass Filter
PD01	Paint Detail Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.4, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF09	Fiberglass Filter
PD02	Paint Detail Booth No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.4, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF10	Fiberglass Filter
PD03	Paint Detail Booth No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.4, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF11	Fiberglass Filter
PD04	Paint Detail Booth No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.4, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8, 6.2.9	FF12	Fiberglass Filter
MM01	Miscellaneous VOC/HAP sources – surface coating	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.2.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.7, 6.2.8	N/A	None
TK01	13,000 gallon Storage Tank	391-3-1-.02(2)(vv)	2.1.1, 3.4.2, 6.2.5, 6.2.6, 6.2.7, 6.2.8	N/A	None

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3715-139-0109-V-02-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Cottrell constructed four new paint booths, PB05 through PB08, in 2000. In order to avoid triggering the BACT plus offsets requirements of Georgia Rule 391-3-1-.03(8)(c)(14), the facility accepted a cap on the emissions from its surface coating line of 224 tons per year. This cap, which appears as Condition No. 3.2.1, was established by adding 39 tons to the baseline emissions from these operations.

40 CFR Part 60, Subpart Kb has been updated and the stated capacity at which an organic liquid storage tank is subject to the regulation is now greater than or equal to 75 m³, which is 19,813 gallons. Therefore, tank TK01 is no longer subject to this regulation since it has a capacity of 13,000 gallons.

The facility is also no longer subject to the standards of 112(j) of the Clean Air Act since any applicable NESHAPs have been promulgated and the facility has a HAP emission limit of less than 10 tons per year of any single HAP and/or less than 25 tons per year of any combination of HAP emissions.

D. Compliance Status

The facility did not indicate any compliance issues in the application.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.3.1 has been deleted since it stated that tank TK01 was subject to 40 CFR 60, Subpart Kb. This tank is no longer subject under the updated regulation and therefore the condition is not necessary.

Condition 3.3.2 has been deleted since it stated that the facility was subject to the standards of 112(j). The facility is no longer subject to this part of the Clean Air Act due to the promulgation of NESHAP regulation and the facility wide HAP emission limit and therefore the condition is not necessary.

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 (or sixty (60) days for tests required by 40 CFR Part 63) 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**

Testing requirements specified in Permit No. 3715-139-0109-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

2. Equipment Groups (all subject to the same test requirements):

Not 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**1. Individual Equipment:**

Monitoring requirements specified in Permit No. 3715-139-0109-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition 5.3.1 not necessary due to updated permit template conditions so it has not been included in the Title V Renewal Permit.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

The facility does not use control equipment to comply with any VOC standards or limits. The only control equipment at the facility are fabric filters on the spray booths to control particulate emissions. The particulate emissions, pre-controlled, would not be greater than the major source threshold value of 100 tpy and therefore CAM would not be 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

Record keeping and reporting requirements specified in Permit No. 3715-139-0109-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Conditions stating the recordkeeping and reporting requirements for 40 CFR Part 60, Subpart Kb and for section 112(j) of the Clean Air Act have been removed from this section of the permit. These regulations are no longer applicable, as stated in Section III.C. of this narrative. The remaining conditions have been renumbered appropriately.

VII. Specific Requirements

- A. Operational Flexibility
Not Applicable
- B. Alternative Requirements
Not Applicable
- C. Insignificant Activities
Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.
- D. Temporary Sources
Not Applicable
- E. Short-Term Activities
Not Applicable
- F. Compliance Schedule/Progress Reports
Not Applicable
- G. Emissions Trading
Not Applicable
- H. Acid Rain Requirements
Not Applicable
- I. Stratospheric Ozone Protection Requirements
Not Applicable
- J. Pollution Prevention
Not Applicable
- K. Specific Conditions
Not 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

The 30-day public notice began on April 28, 2008 and ended on May 29, 2008. No comments were received by the Division.