

Facility Name: **Aker Plastics Company, Inc.**
 City: Valdosta
 County: Lowndes
 AIRS #: 04-13-185-00023

Application #: TV-15126
 Date Application Received: March 26, 2004
 Permit No: 3088-185-0023-V-02-0

Program	Review Engineers	Review Managers
SSPP	Matt Henderson	Eric Cornwell
ISMP		Richard Taylor
SSCP	N/A	N/A
Toxics	Michael Odom	Karen Hays

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 **Aker Plastics Company, 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:

Aker Plastics Company, Inc.

2. Parent/Holding Company Name

MAAX Inc.

3. Previous and/or Other Name(s)

Corl Corporation, Glas Tec, and MAAX, USA.

4. Facility Location

1625 James P. Rodgers Road
Valdosta (Lowndes County) 31601

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

The facility is located in an attainment area.

6. Class I Area Impacts

The facility is located within 200 km of the Okeefenokee and Wolf Island Class I areas.

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
3088-185-0023-V-01-0	September 22, 1999	Initial Title V Permit, issued to MAAX, USA.
Off-Permit Change Letter	October 9, 2000	Addition of Sink Manufacturing Process.
Off-Permit Change Letter	July 18, 2003	Reconfiguration of the Gel Coat Line

D. Process Description

1. SIC Codes(s)

3088 - Establishments primarily engaged in manufacturing plastics plumbing fixtures.

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 produces fiberglass bathtubs, shower stalls, and artificial marble sinks.

3. Overall Facility Process Description

Using gel coats, resins, and fiberglass matting applied to molds of various shapes, fiberglass bathtubs and shower stalls are manufactured. Particulate matter emissions are generated during the gel coat and resin spray up activities as well as the finishing and grinding activities that take place once the cured parts are removed from their molds. Sinks are manufactured using an artificial marble resin (containing styrene) which is poured manually into molds. VOC emissions occur from the use of the gel coats and resins, which contain large amounts of styrene and other VOCs.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Aker Plastics Company, Inc. is a potentially major source in regard to the PSD/NSR regulations due to the fact that potential VOC emissions from the facility exceed 250 tons per year. VOC emissions from the facility have been capped below 250 tons per year to avoid PSD/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	Yes			✓
PM ₁₀	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	N/A			
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

Aker Plastics Company, Inc. is subject to 40 CFR 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*. Aker Plastics Company, Inc. is required to comply with all applicable standards of Subpart WWWW by no later than 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:**

Emission and operating caps specified in Permit No. 3088-185-0023-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

None applicable.

C. Compliance Status

The facility is in compliance with all applicable rules and standards.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition No. 2.1.1 limits VOC emissions from the entire facility to less than 249 tons during any twelve consecutive month period.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 3088-185-0023-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
G100	Gel coat station in gel coat area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 5.2.1, 6.2.1 through 6.2.19	GP10	Particulate Filter
G200	Chop area in gel coat area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 5.2.1, 6.2.1 through 6.2.19	GP20	Particulate Filter
A100	Gel coat booth in acrylic area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 5.2.1, 6.2.1 through 6.2.19	AP10	Particulate Filter
A200	Chop area in acrylic area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 5.2.1, 6.2.1 through 6.2.19	AP20	Particulate Filter
S100	Sink area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 6.2.1 through 6.2.19	N/A	
R100	Research and development	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 through 3.3.5, 3.4.1, 3.4.2, 6.2.1 through 6.2.19	N/A	

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

C. Equipment & Rule Applicability

Emission and Operating Caps:

None Applicable.

Applicable Rules and Regulations:

Rules and Regulations Assessment:

40 CFR 63 Subpart WWWW applies to the gel coat and resin spray booths, cultured marble, and mold forming (Emission Unit ID Nos. G100, G200, A100, A200, S100, and R100). Applicability for this standard is triggered when the primary operation at a facility is the manufacture of reinforced plastic composite products and the facility is a major source for the emission of HAP, as defined in 40 CFR 63.2.

Georgia Air Quality Rule 391-3-1-.02(2)(e), *Particulate Emission from Manufacturing Processes*, applies to the gel coat and resin spray booths, cultured marble, and mold forming units (Emission Unit ID Nos. G100, G200, A100, A200, and R100). Applicability for this particular rule is triggered when a facility engages in any sort of manufacturing process.

Georgia Air Quality Rule 391-3-1-.02(2)(b), *Visible Emissions*, applies to any visible emissions emitted from the facility. Applicability for this particular rule is triggered when a facility is subject to another emission limitation under 391-3-1-.02(2).

Emission and Operating Standards:

40 CFR 63 Subpart WWWW sets forth three different methods for compliance with the standard: compliant materials usage, MACT Model point averaging (emissions averaging), and use of a control device. The compliant materials and emissions averaging compliance options are included in the permit. The control device option was left out due to the fact that the facility does not employ any control device.

Georgia Air Quality Rule (e) requires that the amount of particulate matter emitted from not exceed the value calculated using the equation presented in the Rule.

Georgia Air Quality Rule (b) requires that any visible emissions emitted from the facility not equal or exceed forty (40) percent.

D. Compliance Status

The facility is in compliance with all applicable rules and regulations.

E. Operational Flexibility

None requested by the facility.

F. Permit Conditions

Condition Nos. 3.3.1 through 3.3.5 detail the requirements of 40 CFR 63 Subpart WWWW.

Condition No. 3.3.1 requires that compliance with 40 CFR 63 Subpart A and Subpart WWWW be achieved on April 21, 2006.

Condition No. 3.3.2 lists operations which may occur at the facility that will not be regulated under 40 CFR 63 Subpart WWWW.

Condition No. 3.3.3 lists the organic HAP content limits for resins and gel coats and the 12-month rolling average organic HAP emission limits for each open molding operation. The facility is required to comply with either the organic HAP content limits or the 12-month rolling average organic HAP emission limits as of April 21, 2006.

Condition No. 3.3.4 lists the work practice standards the facility must comply with regarding new or existing cleaning and organic HAP-containing materials storage operations.

Condition No. 3.3.5 lists the work practice standards the facility must comply with regarding the operation of its organic HAP-containing material mixing tanks. These work practice standards involve the use of covers on the tanks and the closing of any tank vents while the tanks are in use.

Condition No. 3.4.1 limits the opacity of visible emissions from the facility to less than forty (40) percent, as specified by Georgia Rule (b).

Condition No. 3.4.2 limits the amount of particulate matter that can be emitted from the fiberglass manufacturing processes, using an equation which is applicable to any manufacturing process with a process input weight rate less than or equal to 30 tons per hour, as specified by Georgia Rule (e).

Existing Condition No. 3.5.1 has been moved to Section 5.2.

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**1. Individual Equipment:**

None applicable.

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

Condition No. 5.2.1 requires that the filter media of all the particulate matter filters (Air Pollution Control Device ID Nos. GP10, GP20, AP10, and AP20) controlling overspray from the spray booths (Emission Unit ID Nos. G100, G200, A100, and A200) be changed once per day of operation. The date and time of these filter changes is to be noted in a logbook. This requirement was previously listed as Condition No. 3.5.1.

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

Subpart WWWW Requirements

Permit Condition No. 6.2.1 sets forth the information sources and methods to be used to determine the organic HAP content of the gel coats and resins used at the facility.

Permit Condition No. 6.2.2 sets forth the emission factors and equations used to calculate the organic HAP emissions from the facility using either the "Calculated organic HAP emission factor option", "HAP emission factor averaging option", or the "HAP content limit option".

Permit Condition No. 6.2.3 requires compliance with Permit Condition No. 3.3.3 by maintaining, on a 12 month rolling average, by maintaining organic HAP emission factors less than or equal to the appropriate organic HAP emission limit or by using compliant materials.

Permit Condition No. 6.2.4 requires continuous compliance with the work practice standards listed in Permit Condition Nos. 3.3.4 and 3.3.5.

Permit Condition No. 6.2.5 requires the collection of records regarding usage, organic HAP content, and type of operation each resin and gel coat is used on when complying with the organic HAP emission limits listed in Table 3.

Permit Condition No. 6.2.6 states that if all resins and gel coats used comply with the content limits or emission limits, no usage records must be kept, but a statement of compliance must be added to each compliance report. If a higher HAP-content gel coat is used or an application method that results in increased organic HAP emissions is employed, compliance with the content or emissions limits will have to be demonstrated again or usage records will have to be collected.

Permit Condition No. 6.2.7 requires the submission of a Notification of Compliance Status by no later than May 21, 2007 if compliance with the organic HAP emission limits of Condition No. 3.3.3 (Averaging) is being demonstrated.

Permit Condition No. 6.2.8 requires the submission of a Notification of Compliance Status by no later than May 21, 2006 if compliance with the organic HAP content limits of Condition No. 3.3.3 is being demonstrated.

Permit Condition No. 6.2.9 lists the notifications and reports that must be submitted to the Division.

Permit Condition No. 6.2.10 requires the resubmission of any notification listed in Permit Condition No. 6.2.9 if any of the information in the notification is changed. This resubmission is to occur no later than 15 days after the change is made.

Permit Condition No. 6.2.11 requires that the following records be maintained onsite at the facility: copies of each notification and report submitted to the Division, copies of all records pertaining to the calculation of organic HAP emissions, and a statement certifying compliance with the work practice standards of Permit Condition Nos. 3.3.4 and 3.3.5.

Permit Condition No. 6.2.12 requires that records pertaining to compliance with Subpart WWWW be maintained in a manner that makes it easy to access and suitable for inspection.

Permit Condition No. 6.2.13 requires that records pertaining to compliance with Subpart WWWW be maintained for at least five years from the date of record.

Permit Condition No. 6.2.14 requires that all records be maintained onsite at the facility for at least two years and specifies the formats in which the records can be stored.

Permit Condition No. 6.2.15 lists, in tabular format, the requirements for demonstrating compliance with the organic HAP emission or content limits of Permit Condition No. 3.3.3 and the work practice standards of Permit Condition Nos. 3.3.4 and 3.3.5.

VOC Record Keeping and Reporting

Permit Condition No. 6.2.16 requires usage records for all VOC-containing materials utilized at the facility.

Permit Condition No. 6.2.17 requires the calculation of the monthly VOC emissions from the entire facility. Emissions are calculated using the equations presented in Permit Condition No. 6.2.19 and Appendix H of the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**. A notification is required to be sent to the Division if the monthly VOC emissions equal or exceed 20.8 tons.

Permit Condition No. 6.2.18 requires the calculation of the monthly rolling 12-month total VOC emissions from the entire facility. A notification is required to be sent to the Division in the monthly rolling 12-month total VOC emissions equal or exceed 249 tons.

Permit Condition No. 6.2.19 contains the equations and methods used to calculate the monthly VOC emissions from the facility.

VII. Specific Requirements**A. Operational Flexibility**

Aker Plastics Company, Inc. has not requested any operational flexibility for any process equipment at the facility.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The facility is currently operating in compliance with all applicable rules and standards.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Aker Plastics Company, Inc. is not subject to Title VI.

J. Pollution Prevention

Not 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

The 30-day public review started on January 28, 2005 and ended on February 27, 2004. Comments were not received by the Division.