

Facility Name: **Spurlin Industries, Inc. – Woodbury**
 City: Woodbury
 County: Meriwether
 AIRS #: 04-13-199-00020

Application #: TV-17721
 Date Application Received: October 10, 2007
 Permit No: 3088-199-0020-V-02-0

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 **Spurlin Industries, Inc. – Woodbury** 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: Spurlin Industries, Inc. – Woodbury

2. Parent/Holding Company Name

Spurlin Industries, Inc.

3. Previous and/or Other Name(s)

None.

4. Facility Location

212 Dromedary Street
Woodbury, GA 30293

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

This facility is located in Meriwether County, an attainment area for all criteria pollutants.

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
3088-199-0020-V-01-0	October 2, 2003	Initial Title V
3088-199-0020-V-01-1	July 29, 2005	Removal of the Shower Chop Station, rerouting of stack emissions, and addition of a conveyor line to increase production

D. Process Description

1. SIC Codes(s)

3088

2. Description of Product(s)

Spurlin Industries, Inc in Woodbury manufactures fiberglass bath products.

3. Overall Facility Process Description

The acrylic tub manufacturing line begins with acrylic sheets, which are received by the facility, and are heated and vacuum-molded to form tubs. The molds are then sent to the chop station where they are sprayed with a styrene-based resin and fiberglass filament mixture. Next the molds are moved to trimming and finishing stations. The tubs are then sent to a patch and repair. After the tubs are patched and repaired they either go directly to inspection and packaging or are sent to the whirlpool station where they are converted to whirlpools by adding the appropriate fixtures.

The jacuzzis are manufactured a little differently. The molds are sprayed with gel coat and catalyst at the gel coat spray booth. The molds are then moved to a chop booth where they are sprayed with a styrene-based mixture of resin and fiberglass filament. Similar to the tub line, the jacuzzis are sent to a trim station then are cut and drilled. Next they are moved to a grinding booth where the edges are sawed away. Finally they are buffed, inspected, packaged, and stored prior to shipping.

The Shower Chop Station was removed with Permit Amendment No. 3088-199-0020-V-01-1.

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 not subject to any PSD/NSR regulations; the potential emissions of all criteria pollutants are below the PSD major source thresholds. A 250-ton limit has been established in order to ensure PSD avoidance.

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	No			
SO ₂	No			
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes			✓
TRS	No			
H ₂ S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

This facility is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastics Composites Production, which is codified as 40 CFR Part 63, Subpart WWWW.

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. 3088-199-0020-V-01-0 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. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

C. Compliance Status

No noncompliance issues were identified in the application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Permit Conditions specified in Permit No. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative. There are no new permit conditions for the Title V Renewal.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 3088-199-0020-V-01-0. Please refer to this narrative.

Permit Amendment No. 3088-199-0020-V-01-1 is for the removal of the Shower Chop Station (Emission ID No. SC1).

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
TC1	Tub Chop Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.1 through 6.2.15	FF1	Fabric Filter
CB1	Jacuzzi Chop Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.1 through 6.2.15	FF3	Fabric Filter
GS1	Gel Coat Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.1 through 6.2.15	FF4	Fabric Filter

* 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. 3088-199-0020-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Emission and Operating Caps:

Emission and Operating Caps specified in Permit No. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Since the initial Title V permit was issued in 2003, 40 CFR 63 Subpart WWWW has been amended for clarification to sections of the rule. These updates are reflected in conditions 3.3.3 and 3.3.4.

Rules and Regulations Assessment:

Rules and Regulations Assessment specified in Permit No. 3088-199-0020-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

D. Compliance Status

No noncompliance issues were identified in the application.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Permit Conditions specified in Permit No. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

Condition 3.3.1 has been modified to omit the last sentence of the condition. The listed conditions are currently effective because it is now after the NESHAP compliance date.

Condition 3.3.2 has been added as a result of the clarification of 40 CFR 63 Subpart WWWW.

Conditions 3.3.3, 3.3.4, and 3.4.4 have been modified as a result of the amended 40 CFR 63 Subpart WWWW.

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**

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:**

Monitoring requirements specified in Permit No. 3088-199-0020-V-01-0 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 monitoring requirements):

Monitoring requirements specified in Permit No. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

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

Record keeping and reporting requirements specified in Permit No. 3088-199-0020-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

After the initial Title V permit was issued in 2003, 40 CFR 63 Subpart WWWW was amended for clarification to sections of the rule. Conditions 6.2.4 through 6.2.10 were modified and renumbered to 6.2.4 through 6.2.14 to reflect the 2005 amendment of 40 CFR 63 Subpart WWWW.

VII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

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

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

None Applicable.

E. Short-Term Activities

None Applicable.

F. Compliance Schedule/Progress Reports

The Division's files indicate that the facility does not currently have any compliance issues.

G. Emissions Trading

None Applicable.

H. Acid Rain Requirements

None Applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they have air conditioners or refrigeration equipment that use CFC's, HFC's or other stratospheric ozone-depleting substances. The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

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

The 30-day public review ended on April 21, 2008. Comments were not received by the Division.