

Facility Name: **The HON Company – Cedartown Plant**

City: Cedartown

County: Polk

AIRS #: 04-13-23300022

Application #: 17507

Date SIP Application Received: July 2, 2007

Date Title V Application Received: August 7, 2007

Permit No: 2522-233-0022-V-01-2

<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. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2522-233-0022-V-01-0	June 25, 2002	X	
2522-233-0022-V-01-1	April 20, 2005	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2522-233-0022-V-01-0	Initial Title V Permit
2522-233-0022-V-01-1	Amendment to change acceptable operating ranges for baffle/waterfall and baghouse control devices.

### B. Regulatory Status

#### 1. PSD/NSR/RACT

The HON Company, as a furniture manufacturing facility, is not one of the 28 listed source categories in 40 CFR 52.21 that are subject to the 100 TPY PSD applicability threshold. Prior to this amendment, The HON Company was considered a synthetic minor PSD facility due to the 249 ton per year VOC emission limit in Condition 2.1.1. The modification requested in Application No. 17507 (including the March 27, 2007 Off Permit Change to add a powder coating line) has the potential to emit VOC at greater than 250 tons per year. However, HON has requested that the modification be limited to 249 tons of VOC per year in order to avoid PSD applicability for the modification under the PSD one-time-doubling exception to the major modification rule. The old facility-wide PSD avoidance limit is moved to Condition 3.2.1 since the condition no longer applies to the entire facility. The new PSD avoidance limit is documented in Condition 3.2.2. The HON Company will be considered a PSD major source for VOC after this modification commences operation.

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>	✓			✓
VOC	✓	✓		
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS	n/a			
H <sub>2</sub> S	n/a			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

## II. Proposed Modification

### A. Description of Modification

Application 17507 proposes the construction of six new metal furniture manufacturing lines, with two spray application booths per line. Only Line 6 will include an additional dip tank for coating parts. The modification also includes the new metal furniture manufacturing line that uses a powder coating booth (Line 11). The powder coating booth was approved as an Off Permit Change on March 26, 2007.

### B. Emissions Change

**Table 4: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	✓	11.6	17.5
PM <sub>10</sub>	✓	11.6	17.5
SO <sub>2</sub>	✓	0.23	0.32
VOC	✓	249	249*
NO <sub>x</sub>	✓	38.4	53.9
CO	✓	32.3	45.3
TRS	n/a	n/a	n/a
H <sub>2</sub> S	n/a	n/a	n/a
Indiv. HAP	✓		
Xylene		72.7	113.8
Cumene		5.68	8.9
Total HAPs	✓	80.1	125.4

\*Potential VOC emissions are constrained by a requested 249 ton per year VOC limit to avoid PSD review for this modification.

### C. PSD/NSR Applicability

The HON Company is located in an attainment area for all pollutants. Therefore, NAA-NSR is not applicable to the facility. The HON facility is not one of the 28 named source categories and is therefore not subject to the lower 100 ton per year PSD applicability threshold. The existing facility operated under a 249 ton per year PSD avoidance limit to be considered a synthetic minor PSD facility. The facility requested a 249 ton per year VOC emission limit on the modification (i.e., Lines 5-11) to avoid PSD applicability to this modification based on the PSD one-time-doubling exception to the major modification rule. The HON Company is considered a PSD major source for VOC emissions for future modifications.

### III. Facility Wide Requirements

A. Emission and Operating Caps:

Condition 2.1.1 is deleted. The PSD Avoidance limit in Condition 2.1.1 no longer applies to the “entire facility,” but rather the group of existing wood furniture manufacturing operations (i.e., LCF1, RCF1, RCF2, RCF3, TDF1, and TDF2) and existing metal furniture manufacturing operations (i.e., Lines 1-4, SPF1 activities on Lines 1-4, and PMF1). As such, the PSD avoidance limit is moved to Condition 3.2.1 for the defined group of emission units.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – Not Applicable.

Emission and Operating Standards – Not Applicable.

C. Compliance Status

Not Applicable.

D. Operational Flexibility

No operational flexibility was requested.

E. Permit Conditions

Condition 2.1.1 is deleted.

#### IV. Regulated Equipment Requirements

##### A. Brief Process Description

Application No. 17507 and the contemporaneous March 26, 2007 Off Permit Change propose the construction of seven new metal furniture manufacturing lines: six lines employ spray/dip coating booths (Lines 5 – 10) and one line employs a powder coating booth (Line 11). Each spray coating line (Lines 5 – 10) includes cleaning/surface passivation tanks, manual and rotating-bell electrostatic coating applicators, a flashoff area, natural gas-fired drying ovens, coating day tanks, and solvent cleaning and solvent-bearing waste containers. Only Line 6 includes a dip coating tank. The powder coating line (line 11) includes the powder coating booth, electric curing oven, limited cleaning solvent usage and solvent-bearing waste containers.

##### B. Equipment List for the Process

#### 3.1 Revised Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Line 1	Metal Furniture Manufacturing Line #1 (Including spray booths L1B1 and L1B2 and dip tank DIP1)	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L1R1 & L1R2	Baffle followed by Water Curtain
Line 2	Metal Furniture Manufacturing Line #2 (Including spray booths L2B1 and L2B2 and dip tank DIP2)	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L2R1 & L2R2	Baffle followed by Water Curtain
Line 3	Metal Furniture Manufacturing Line #3 (Including spray booths L3B1 and L3B2 and dip tank DIP3)	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L3R1 & L3R2	Baffle followed by Water Curtain
Line 4	Metal Furniture Manufacturing Line #4 (Including spray booths L4B1 and L4B2)	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L4R1 & L4R2	Baffle followed by Water Curtain
Line 5	Metal Furniture Manufacturing Line #5 (Including spray booths L5B1 and L5B2)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L5R1 & L5R2	Baffle followed by Fabric Filter
Line 6	Metal Furniture Manufacturing Line #6 (Including spray booths L6B1 and L6B2 and dip tank DIP6)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L6R1 & L6R2	Baffle followed by Fabric Filter
Line 7	Metal Furniture Manufacturing Line #7 (Including spray booths L7B1 and L7B2)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L7R1 & L7R2	Baffle followed by Fabric Filter

SIP CONSTRUCTION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Line 8	Metal Furniture Manufacturing Line #8 (Including spray booths L8B1 and L8B2)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L8R1 & L8R2	Baffle followed by Fabric Filter
Line 9	Metal Furniture Manufacturing Line #9 (Including spray booths L9B1 and L9B2)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L9R1 & L9R2	Baffle followed by Fabric Filter
Line 10	Metal Furniture Manufacturing Line #10 (Including spray booths L10B1 and L10B2)	40 CFR 63, Subpart RRRR 40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.1, 6.1.7, 6.2.12 – 6.2.16, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L10R1 & L10R2	Baffle followed by Fabric Filter
Line 11	Metal Furniture Powder Coating Line #11 (Including powder coating booth L11B1)	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.2, 5.2.4, 6.1.7, 6.2.17 – 6.2.19, 6.2.20, 6.2.21	L11F	Fabric Filter
PMF1	Metal Furniture Paint Mixing and Distribution	40 CFR 63, Subpart RRRR 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.17 – 3.3.19, 3.4.1, 3.4.2, 6.1.7, 6.2.17 – 6.2.19	None	None
SPF1	Metal Furniture Touchup Spray Cans	40 CFR 60, Subpart EE 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(y)	3.3.14 – 3.3.16, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 6.1.7, 6.2.12 – 6.2.16, 6.2.20, 6.2.21	None	None
LCF1	Paint Room and Equipment Clean-up	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 6.1.7, 6.2.8 – 6.2.11	None	None
RCF1	Cleaning Op – Router Cell	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.8 – 6.2.11	BH01	Router Cell Dust Collection System and Baghouse
RCF2	Adhesive Roll Coating Op – Router Cell	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.8 – 6.2.11	BH01	Router Cell Dust Collection System and Baghouse
RCF3	Post Former Adhesive Application – Router Cell	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.8 – 6.2.11	BH01	Router Cell Dust Collection System and Baghouse
TDF1	Cleaning Op – Top Department	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.8 – 6.2.11	BH02	Top Department Dust Collection System and Baghouse
TDF2	Adhesive Roll Coating Op – Top Department	40 CFR 63, Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.3.1 – 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.8 – 6.2.11	BH02	Top Department Dust Collection System and Baghouse

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

C. Equipment & Rule Applicability

**Emission and Operating Caps –**

The HON Company requested that potential VOC emissions from the seven new metal furniture manufacturing lines (i.e., Lines 5 – 11) be capped at 249 tons per year in order to avoid applicability of PSD requirements to this modification. This PSD avoidance limit is included in the permit amendment as Condition 3.2.2. The HON Company was previously considered a synthetic minor PSD source due to the existing 249 ton per year facility-wide PSD avoidance limit, which has been moved to 3.2.1. Since the existing facility was PSD-minor prior to the

modification and the modification itself does not represent a major PSD facility the modification avoids PSD in accordance with the “one time doubling” exception to the major modification rule.

### **Applicable Rules and Regulations -**

#### Emission and Operating Standards:

40 CFR 63, Subpart RRRR (Surface Coating of Metal Furniture) –The new coating lines (Lines 5-11) are considered existing sources since Lines 1-4 existed prior to the MACT RRRR applicability date (April 24, 2002) and the modification is not considered a reconstruction of the affected source (i.e., no equipment or components are replaced by the modification). The affected source for MACT RRRR is the collection of all: coating applicators, flashoff areas, drying ovens, paint, thinner and cleaning material storage and distribution, and waste storage. Touchup coating using aerosol spray cans is not regulated by MACT RRRR. MACT RRRR limits organic HAP emissions from coatings, thinners, and cleaning materials to less than or equal to 0.83 pounds of organic HAP per gallon of coating solids used during each monthly compliance period. The HON Company may use either the compliant material option or the emission rate without add-on control option to comply with the organic HAP emission limit.

40 CFR 63, Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) – This MACT standard was vacated and remanded by the District of Columbia Court of Appeals. The Court issued the mandate to vacate MACT DDDDD on July 30, 2007. The EPA and EPD have yet to determine how affected sources will be handled. The sources potentially affected by the vacated Boiler MACT (i.e., new, small, gaseous fuel units) would not be subject to any MACT DDDDD requirement, including submission of the Initial Notification.

40 CFR 60, Subpart EE (Surface Coating of Metal Furniture) – The Initial Title V Permit included NSPS EE applicability for existing metal furniture Lines 1-4. However, in a June 23, 2006 Division letter, the Division determined that Lines 1-4 were constructed prior to the applicability date (November 28, 1980) for NSPS EE. This rule applies only to each new metal furniture surface coating line at the affected source, and includes only the application station(s), flashoff area, and the curing oven. Coating application using aerosol spray cans is covered by NSPS EE. The new metal furniture lines that use organic coatings (i.e., Lines 5-10) are each affected sources for NSPS EE. The powder coating line (Line 11) is exempt from NSPS EE according to the definition of “organic coating” in 40 CFR 60.311. NSPS EE limits VOC emissions from each coating line to less than or equal to 7.5 pounds of VOC per gallon of coating solids applied during each monthly compliance period. Transfer efficiency is integral to the compliance calculation. The HON Company may use either the compliant material option or the emission rate without add-on control option to comply with the organic HAP emission limit.

40 CFR 60, Subpart Dc (Small Industrial-Commercial-Institutional Steam Generating Units) – This rule is not applicable. All fuel burning equipment in this modification is smaller than the 10 MMBTU/hr applicability threshold for NSPS Dc.

Georgia Rule (b) (Visible Emissions) – Rule (b) is applicable to all point sources in this modification, with the exception of the aqueous cleaning tank heaters. The drying ovens are

direct contact process heaters (i.e., combustion byproducts commingle with process emissions) and are therefore subject to the opacity limits in Rule (b) in lieu of the opacity limits in Rule (d).

Georgia Rule (d) (Fuel-burning Equipment) – Rule (d) is only applicable to the insignificant (0.25 MMBTU/hr) aqueous cleaning tank heaters. Since the heating units are insignificant, the existing Rule (d) limits in Section 8.19, for units constructed after January 1, 1972 are applicable (e.g., PM emissions less than 0.5 pounds per million BTU heat input and opacity less than 20/27 percent). Rule (d) is not applicable to the electric curing oven on the powder coating line (Line11).

Georgia Rule (e) (Particulate Emissions from Manufacturing Processes) – Rule (e) regulates particulate matter emissions from all point sources, except the aqueous cleaning tanks, which are subject to Rule (d). Emissions are limited to  $E=4.1P^{0.67}$ , where E is the emission limit in pounds per hour and P is the process input weight rate in tons per hour. Particulate matter emissions from the flashoff and drying area (natural gas combustion only) are expected to routinely comply with the allowable emission limit. However, the coating booths (Lines 5-11) require filter media to comply with Rule (e) emission limits. The high particulate matter loading and stickiness of the particles on Lines 5-10 indicates that monitoring of the filter media is required. The light loading and self-cleaning nature of the powder coating filter indicates that only the presence of filter media is necessary to ensure the filter media is functional.

Georgia Rule (y) (VOC Emissions from Metal Furniture Coating) – All metal furniture surface coating lines (Lines 1-11) at the facility are subject to Rule (y) since the actual VOC emissions from the facility are greater than 100 tons per year. Rule (y) does not provide an exemption for powder coating, however, powder coatings are generally considered compliant coatings. Coatings applied by aerosol spray cans are covered by Rule (y). The Rule (y) emission limit is a two-part limit. Each coating used (compliant coating) must comply with an emission limit of 3.0 pounds of VOC per gallon of coating, excluding water. If any coating used on a coating line contains greater than 3.0 pounds per gallon of VOC, then the individual coating line must comply with a 24-hour, volume-weighted average, solids equivalent limit of 5.06 pounds of VOC per gallon of coating solids.

D. Compliance Status

The HON Company is currently in compliance.

E. Operational Flexibility

No operational flexibility was request for this modification.

F. Permit Conditions

Table 3.1 is reorganized to consolidate the spray booths and dip tanks into metal furniture manufacturing lines. Georgia Rule (y) and NSPS EE specifically regulate each manufacturing line. Baghouses RCW1 and TDW1 are redesignated as BH01 and BH04, respectively, to agree with current facility nomenclature. Applicable regulations in Table 3.1 are also revised to reflect current rule applicability.

Conditions 3.2.1 and 3.2.2 are new permit conditions implementing the two PSD avoidance limits.

Conditions 3.3.14 – 3.3.16 are modified to exclude NSPS EE applicability from Lines 1 – 4 and add NSPS EE applicability to Lines 5 – 10. Applicability of NSPS EE to “contact adhesives” in Condition 3.3.16 is removed since the Rule only covers “coatings.” Condition 3.3.15 is modified to include aerosol can touchup painting on Lines 5 – 10. The two compliance options are now clearly identified in Condition 3.3.15. Condition 3.3.16 is expanded to not only define “applied” for NSPS EE, but also “used” for MACT RRRR and “delivered” for Georgia Rule (y).

Conditions 3.3.17 – 3.3.19 are new permit conditions defining the applicability, emission limits, and compliance options of MACT RRRR.

Conditions 3.4.1 – 3.4.4 are modified to add the new metal furniture coating lines and redefine applicability to existing metal furniture operations in terms of lines rather than booths. This change is not significant for Georgia Rules (b), (d) and (e). However, the solids equivalent limit compliance option for Rule (y) requires compliance for each line. Condition 3.4.3 is modified to include aerosol can touchup painting on Lines 1 – 11.

Condition 3.5.2 is a new permit condition requiring the use of filter media on the powder coating lines (Line 11).

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

A. Individual Equipment:

Two new test methods, allowed by MACT RRRR, are added to Condition 4.1.3 by this amendment. The two new test methods determine the volume fraction of coating solids for a coating and the density for a coating.

The compliance demonstration calculations are considered a “performance test” in NSPS EE. However, since there is no actual EPA Method used in the “performance test” the requirements to provide pre-test notifications and submit the report in the EPD report format are not required for the compliance demonstration in Condition 6.2.15

B. Equipment Groups (all subject to the same test requirements): Not applicable.

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

A. Individual Equipment:

Condition 5.2.1 is modified to add a requirement to monitor and record the pressure drop across the baffle/filter systems on Lines 5 – 10 on a daily basis. Proper use of the baffle filter system is necessary for Rule (e) compliance. The pressure drop monitoring in subparagraph 5.2.1 a. for individual booths is consolidated to manufacturing line (i.e., Lines 1 – 4) to be consistent with the rest of the permit.

Condition 5.2.4 is a new permit condition requiring inspection of the powder coating booth filter to ensure its presence and serviceability.

B. Equipment Groups (all subject to the same monitoring requirements): Not applicable.

**VII. Other Record Keeping and Reporting Requirements**

Condition 6.1.7 b. i. is modified to redefine the “facility-wide” PSD avoidance limit as the group of existing emission units. Condition 6.1.7 b. ii. is modified to add Georgia Rule (y) deviation reporting for new metal furniture coating lines 5 – 11 and redefine existing metal furniture operations in terms of lines. Condition 6.1.7 b. iii. is modified to report deviations from the emission limits of NSPS EE for Lines 5 – 10 in lieu of Lines 1 – 4 (Condition 6.2.16 provides additional NSPS EE reporting requirements). Condition 6.1.7 b. vii. is a new condition to report deviations from the new PSD avoidance limit for Lines 5 – 11. Condition 6.1.7 b. viii. is a new condition to report deviations from the MACT RRRR emission limits for Lines 5 – 11 (Condition 6.2.19 provides additional MACT RRRR reporting requirements). Condition 6.1.7 c. x. is a new permit condition to report deviations from the proper operating range for baffle/filter systems on Lines 5- 10. Condition 6.1.7 c. xi. is a new permit condition to report the operation of the powder coating booth on Line 11 without serviceable filter media in place. Condition 6.1.7 d. i. is a new permit condition to report any failure to maintain any MACT RRRR records, as defined in 40 CFR 63.4930.

Conditions 6.2.1 is modified to require the separate accounting for materials used on Lines 5 – 11 from the group of existing emission sources (previously referred to as the “entire facility”), which are subject to a separate PSD avoidance limit. The requirement to track volatile HAP (VHAP) content and usage is removed from this condition.

Condition 6.2.2, which is a mixture of PSD emission calculation procedures and NSPS EE calculation and recordkeeping references, is deleted. The condition number is “Reserved” to defer renumbering of all permit conditions in Section 6.2 until the renewal permit is processed. PSD avoidance limit calculations are included in Condition 6.2.3 and 6.2.4. NSPS EE conditions are now documented in Conditions 6.2.5 – 6.2.16.

Conditions 6.2.3 and 6.2.4 are modified to require separate calculation of emissions for each of the two PSD avoidance limits (Condition 3.2.1 and 3.2.2).

Conditions 6.2.5 – 6.2.7 are deleted and the condition numbers are “reserved.” Condition 6.2.5 – 6.2.7 are derived from NSPS EE, but do not portray a complete reflection of the NSPS recordkeeping, calculation or reporting requirements. New conditions correctly implementing NSPS EE are documented in Conditions 6.2.12 – 6.2.16.

Conditions 6.2.12 – 6.2.16 are new permit conditions implementing NSPS EE. Condition 6.2.12 contains the monitoring/recordkeeping requirements. Condition 6.2.13 contains the compliance demonstration calculation procedures, including specific equations. Condition 6.2.14 contains the NSPS General Provision notifications referenced by NSPS EE. Condition 6.2.15 contains the Initial Performance Test reporting requirement. Since Condition 6.2.15 does not require any actual source testing (i.e., Initial Performance Test is actually a notification of compliance status), the notification and

reporting requirements in Section 4.1 are not applicable. Condition 6.2.16 contains the NSPS EE quarterly deviation report, with the “no deviations” report consolidated with Condition 6.1.7. b. iii reporting.

Conditions 6.2.17 – 6.2.19 are new permit conditions implementing MACT RRRR. Condition 6.2.17 contains the MACT RRRR monitoring/recordkeeping requirements. Condition 6.2.18 contains the MACT RRRR monthly compliance demonstration calculation procedures. Condition 6.2.19 contains the semiannual reporting requirements, which are more detailed than the deviation reporting required by Condition 6.1.7 c. iii.

Conditions 6.2.20 and 6.2.21 are new permit conditions implementing Georgia Rule (y). The monitoring and calculation procedures in Chapter 2-33 of Georgia’s Procedures for Testing and Monitoring provide NSPS EE monitoring and calculation procedures, which are not amenable to demonstrating compliance with Georgia Rule (y). Condition 6.2.20 provides for daily recordkeeping for coatings used on all metal furniture manufacturing lines. Condition 6.2.21 requires daily calculation of the VOC content for each coating used and the volume-weighted solids equivalent for each line, when any coating exceeds the compliant material emission limit. Condition 6.2.21 requires the Permittee to submit sample Rule (y) compliance calculations within 60 days of permit issuance.

**VIII. Specific Requirements**

A. Operational Flexibility

No operational flexibility requested.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

Application No. 17507 includes 20 insignificant (design heat input rate less than 10-MMBTU/hr, firing natural gas) oven/flash-off burners, water heaters and makeup air heaters. Although these fuel burning devices are part of the MACT RRRR and NSPS EE affected source, VOC and HAP emissions for the burners are not specifically considered for compliance matters.

D. Temporary Sources

No temporary sources are included in this modification.

E. Short-Term Activities

No short-term activities are included in this modification.

F. Compliance Schedule/Progress Reports

The facility is currently in compliance.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Prevention of Accidental Releases

Not applicable.

J. Stratospheric Ozone Protection Requirements

Not applicable.

K. Pollution Prevention

The baffle/filter control devices intercept paint overspray on the baffle blades. The intercepted paint drips down the baffle blade and is collected in a trench. The collected “baffle paint” is returned to the Paint Mix Center to be mixed into gray-shade paint. The re-use of the baffle paint reduces raw paint requirements and reduces the amount of waste paint send off-site for disposal. Permit Condition 5.2.1 c. requires the proper operation of the baffle/filter systems and establishes the proper operating range.

L. Specific Conditions

Not applicable.

**Addendum to Narrative**

The 30-day public review started on October 8, 2007 and ended on November 8, 2007. Comments were not received by the Division.