

Facility Name: **Horton Homes, Inc.**  
 City: Eatonton  
 County: Putnam  
 AIRS #: 04-13-237-00131

Application #: TV-17947  
 Date Application Received: January 25, 2008  
 Permit No: 2451-237-0131-V-02-0

<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 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 **Horton Homes, 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:

Horton Homes, Inc.

## 2. Parent/Holding Company Name

Horton Homes, Inc

## 3. Previous and/or Other Name(s)

none

## 4. Facility Location

101 Industrial Boulevard  
Eatonton, Georgia 31024  
Putnam County

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

The facility is located in the area of Putnam County that is in attainment for all pollutants.

**B. Site Determination**

Based upon guidance from the USEPA in a letter received by the Division on May 19, 2005, Horton Components (AIRS No. 237-00127), Horton Homes (AIRS No. 237-00131), and Horton Vans (AIRS No. 237-00132) are to be considered one site under Parts 63 (NESHAP) and 70 (Title V) due to the fact that they are under common ownership, that the facilities are adjacent and / or contiguous and the supporting role Horton Components provides to Horton Homes. For Part 52 (PSD), Horton Vans is not considered to be part of the one site. Horton Vans does not share the same two digit industrial SIC code and is not a supporting facility for Horton Components or Horton Homes. From correspondence sent by the Division to Horton Industries, dated November 8, 2004, the Division agrees with the determination of the EPA. This letter further states that Horton Iron Works will be considered part of Horton Homes, Inc. for the purposes of 40 CFR Part 70 and 63. However, Horton Iron Works, having a different industrial grouping for SIC codes, will not be considered part of Horton Homes, Inc. for 40 CFR Part 52. Horton Iron Works is permitted as part of Horton Homes; Horton Iron Works does not have a separate permit.

### 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
2451-237-0131-V-01-0	July 23, 2003	Original Title V Permit
2451-237-0131-V-01-1	October 18, 2006	Re-opened for cause to include NESHAP MMMM and site determination

### D. Process Description

#### 1. SIC Codes(s)

2451

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 manufactured homes.

#### 3. Overall Facility Process Description

Interior and exterior components are assembled to form completed manufactured homes. Wood floor frames are assembled, with all plumbing added, and placed on a metal undercarriage. Next, the floor is covered with carpet and linoleum. Interior and exterior walls are constructed and installed along with all interior components (i.e. toilets, stoves, shelving, cabinets, etc.). Finally, the roof system is constructed and placed on the manufactured home. After cleanup operations, the house is ready to be sold.

#### 4. Overall Process Flow Diagram

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

### E. Regulatory Status

#### 1. PSD/NSR

Horton Homes, excluding Horton Iron Works, and Horton Components share a 249 ton per year VOC limit so that the facility is considered a minor source with respect to PSD/NSR. Horton Iron Works has potential emissions of less than 249 tons per year and is a true minor source facility for 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	y			x
PM <sub>10</sub>	y			x
SO <sub>2</sub>	y			x
VOC	y	x		
NO <sub>x</sub>	y			x
CO	y			x
TRS	n			
H <sub>2</sub> S	n			
Individual HAP	y	x		
Total HAPs	y	x		

#### 3. MACT Standards

Horton Irons Works and Horton Homes are considered one site for Part 63 (NESHAP) and Part 70 (Title V). The site is subject to 40 CFR 63, Subpart Mmmm – “Surface Coating of Miscellaneous Metal Parts and Products,” and 40 CFR Part 63, in Subpart A – “General Provisions”, as specified in Table 2 of 40 CFR 63 Subpart Mmmm, since Horton Homes and Horton Iron Works may coat metal axles and undercarriage parts.

## 4. Program Applicability (AIRS Program Codes)

<b>Program Code</b>	<b>Applicable (y/n)</b>
Program Code 6 - PSD	n
Program Code 8 – Part 61 NESHAP	n
Program Code 9 - NSPS	n
Program Code M – Part 63 NESHAP	y
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. 2451-237-0131-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In Title V Amendment No. 2451-237-0131-V-01-1, the VOC limit for PSD/NSR avoidance was modified due to the guidance received by EPA (as stated above in Section I. E. 1.). Horton Homes (excluding Horton Iron Works), and Horton Components share a 249 ton per year VOC limit so that the facility is considered a minor source with respect to PSD/NSR.

#### B. Applicable Rules and Regulations

Applicable rules and regulations specified in Permit No. 2451-237-0131-V-02-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

Horton Irons Works and Horton Homes are considered one site for Part 63 (NESHAP) and Part 70 (Title V). The site is subject to 40 CFR 63, Subpart Mmmm – “Surface Coating of Miscellaneous Metal Parts and Products,” and 40 CFR Part 63, in Subpart A – “General Provisions”, as specified in Table 2 of 40 CFR 63 Subpart Mmmm, since Horton Homes and Horton Iron Works may coat metal axles and undercarriage parts.

#### C. Compliance Status

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

#### D. Operational Flexibility

None applicable.

#### E. Permit Conditions

Condition 2.1.1 states the PSD/NSR avoidance limit of 249 tpy VOC for Horton Homes (excluding Iron Works) and Horton Components combined.

Condition 2.2.1 states that the facility is subject to 40 CFR Part 63 Subpart A, as specified in 40 CFR Part 63 Subpart Mmmm.

Condition 2.2.2 states the facility is subject to 40 CFR Part 63, Subpart Mmmm, “Surface Coating of Miscellaneous Metal Parts and Products.”

### III. Regulated Equipment Requirements

#### A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 2451-237-0131-V-01-0. Please refer to this narrative.

#### B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements			Air Pollution Control Devices	
Facility	ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Homes	INT02	Floor Construction	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	INT04	Interior Wall Fabrication	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	INT06	Counter Top / Cabinet Installation	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	INT07	Interior Fabrication	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	EXT01	Side Wall Fabrication	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	EXT03	Top Fabrication	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	EXT04	Exterior Fabrication	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Homes	EXT06	Final Finish	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.2, 6.1.7, 6.2.1, 6.2.2, 6.2.3	None	None
Iron Works	P1	Paint Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart M MMM	2.2.1, 2.2.2, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15	P1F	Filter Media
Iron Works	P2	Paint Building	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart M MMM	2.2.1, 2.2.2, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2, 6.1.7, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.14	None	None

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 2451-237-0131-V-02-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In Title V Amendment No. 2451-237-0131-V-01-1, conditions stating the standards of 40 CFR 63, Subpart M MMM – “Surface Coating of Miscellaneous Metal Parts and Products” were added to the permit. These conditions replaced the need for conditions stating 112(j) requirements and so the 112(j) conditions were deleted. The metal coating operations of Horton Homes and/or Horton Iron Works are subject to 40 CFR 63, Subpart M MMM – “Surface Coating of Miscellaneous Metal Parts and Products”, and Horton Iron Works is considered the same site as Horton Homes for Part 63. Therefore, the site is subject to 40 CFR 63, Subpart M MMM – “Surface Coating of Miscellaneous Metal Parts and Products.

D. Compliance Status

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

E. Operational Flexibility

None applicable.

F. Permit Conditions

Conditions 3.3.1 through 3.3.4 state the requirements of 40 CFR Part 63, Subpart M MMM.

Condition 3.4.1 states the opacity standard of less than 40% as stated in Georgia Rule (b).

Condition 3.4.2 states the particulate emission standard of Georgia Rule (e).

Condition 3.5.1 requires that filter changes be performed on the spray booths according to manufacturer’s specifications.

**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:**

None applicable.

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

None applicable.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

Horton Iron Works has one emission unit, paint booth1 (PB1) that has a control device of filter media (PF1) and an emission limit of the Georgia Rule standard. However, emissions pre-controlled are not greater than the Title V major source threshold and therefore, CAM is 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. 2451-237-0131-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

In Title V Amendment No. 2451-237-0131-V-01-1, conditions stating the recordkeeping and reporting requirements of 40 CFR 63, Subpart M MMM – “Surface Coating of Miscellaneous Metal Parts and Products” were added to the permit.

Conditions 6.2.4 through 6.2.14 state the recordkeeping and reporting requirements of 40 CFR 63, Subpart M MMM. The condition stating the requirements for the Notification of Compliance Status has been removed from the renewal permit since this requirement has been fulfilled.

Condition 6.2.17 requires a log of hours of operation and filter changes be kept, to show compliance with Condition 5.3.1.

**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 period began on May 29, 2008 and ended on June 30, 2008 with no comments received by the Division.