

Facility Name: **Horton Vans, Inc.**
 City: Eatonton
 County: Putnam
 AIRS #: 04-13-0237-0132

Application #: TV-15981
 Date Application Received: February 9, 2005
 Date Application Deemed Administratively Complete: March 31, 2005
 Date of Draft Permit:
 Permit No: 3792-237-0132-V-01-0

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 in 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 Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I 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 Vans, 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 Vans, Inc.

2. Parent/Holding Company Name

Horton Industries

3. Previous and/or Other Name(s)

Not Applicable.

4. Facility Location

130 Coleman Drive, Eatonton GA, 31024

5. Attainment or Non-attainment Area Location

The facility is located in an attainment area for all pollutants.

6. Class I Area Impacts

The facility is not located within 200 km of a Class I area.

B. Site Determination

A site determination was performed for the Horton Homes, Inc., Horton Components, Horton Iron Works and Horton Vans, Inc. facilities. In regard to Horton Vans, it was determined that the facility is considered to be one site with Horton Homes, Inc., Horton Components, Horton Iron Works for Title V (40 CFR Part 70) and NESHAP (40 CFR Part 63) purposes but to be a separate entity for PSD (40 CFR Part 52) purposes.

C. Existing Permits

There are no previous or existing permits.

D. Process Description

1. SIC Code: 3792 – Travel Trailers and Campers

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.

2. Description of Product(s)

This facility manufactures open and closed pull-behind trailers.

3. Overall Facility Process Description

This facility manufactures open and closed trailers. They produce high-end trailers such as light-duty car trailers, heavy-duty equipment trailers, luxury-type trailers, and low-end trailers mostly for cargo use.

E. Regulatory Status

1. PSD/NSR

Horton Vans is a minor facility with respect to PSD regulations.

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	y			✓
PM ₁₀	y			✓
SO ₂	y			✓
VOC	y			✓
NO _x	y			✓
CO	y			✓
TRS	n			
H ₂ S	n			
Individual HAP	y	✓		
Total HAPs	y			✓

3. MACT Standards

This facility is subject to 40 CFR 63, Subpart M – *Surface Coating of Miscellaneous Metal Parts and Products*. The compliance date for this regulation is January 2, 2007.

4. Program Applicability

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	y
Program Code V – Title V	y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

There is a facility wide limit of 100 tons per year of VOC emissions, in order to avoid the applicability of Georgia Rule 391-3-1-.02(2)(ii) – *VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products*.

B. Applicable Rules and Regulations

40 CFR 63, Subpart MMMM – *Surface Coating of Miscellaneous Metal Parts and Products*: The facility is subject to this MACT standard since the facility is a major source, or is located at a major source, of hazardous air pollutants. The compliance date for this standard is January 2, 2007. The facility must submit a plan for compliance to the Division by June 2, 2006, as stated by this permit.

C. Compliance Status

The facility applications indicate current compliance with all applicable rules and regulations.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

Permit Condition 2.1.1 limits VOC emissions to less than 100 tons per year.

Permit Condition 2.2.1 and 2.2.2 state that the facility will comply with 40 CFR 63, Subpart MMMM – *Surface Coating of Miscellaneous Metal Parts and Products*, and Subpart A.

III. Regulated Equipment Requirements

A. Brief Process Description

This facility manufactures open and closed trailers. They produce high-end trailers such as light-duty car trailers, heavy-duty equipment trailers, luxury-type trailers, and low-end trailers mostly for cargo use. The facility manufactures approximately 130 trailers per week.

There are three assembly lines for the trailers. Two of the lines can be used for the low-end trailers and all three lines can be used for the high-end trailers, but usually only one line is used to manufacture high-end trailers.

Each trailer begins as a base. The metal frame can then be added by employees before it is coated. Paint Booth 2 coats only black. This is the newer paint booth. The trailers are coated to protect the metal frame from the elements. The exterior of the trailer can be covered with pre-coated metal sheeting. If the trailer exterior is to be covered and the interior is to be covered, the sides of the frame are not coated. Paint Booth 1 coats multiple colors. This booth is used for small-equipment trailers and is seldom used.

There are finish lines that are used to add metal sheet siding and roofs to the trailers. Any electrical work will also be done on these lines as well as the finishing of the interior of the trailers. .

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	40 CFR 63 Subpart M, 40 CFR 63 Subpart A, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 2.2.1, 2.2.2, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	F01, F02	Filter Media
PB02	Paint Booth	40 CFR 63 Subpart M, 40 CFR 63 Subpart A, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 2.2.1, 2.2.2, 3.4.1, 3.4.2, 3.5.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5	F03, F04	Filter Media

C. Equipment & Rule Applicability

Applicable Rules and Regulations

Georgia Rule 391-3-1-.02(2)(b) – *Visible Emissions*:

Visible emissions from the facility are limited to 40% opacity.

Georgia Rule 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes*:
Particulate emissions from the manufacturing processes at the facility are limited by this rule.

D. Compliance Status

The facility applications indicate current compliance with all applicable rules and regulations.

E. Operational Flexibility

Not Applicable.

F. Permit Conditions

Condition 3.4.1 limits particulate matter from the processes in accordance with Georgia Rule 391-3-1-.02(2)(e).

Condition 3.4.2 limits the opacity in accordance with Georgia Rule 391-3-1-.02(2)(b).

Condition 3.5.1 provides that the filter media of each paint booth be changed at least every 10 days of operation.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The standard general requirements are included in the permit. There are no modifications made to these standards in this permit.

B. Specific Testing Requirements

Not Applicable. There are no specific testing requirements in this permit.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. General Monitoring Requirements

The standard general requirements are included in the permit. There are no modifications to the general requirements in this permit.

B. Specific Monitoring Requirements

Not Applicable.

The filter replacement schedule in Condition 3.5.1 ensures proper maintenance of the filter media to minimize emissions.

VI. Other Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The standard general requirements are included in the permit. There are no modifications made to the general requirements in this permit.

B. Specific Record Keeping and Reporting Requirements

There are specific record keeping requirements for 40 CFR 63, Subpart M MMM – *Surface Coating of Miscellaneous Metal Parts and Products*, that consist of submitting the Initial Notification as required by the regulation and submitting a compliance plan by June 2, 2006.

There is a recordkeeping requirement for the filter change requirement for the paint booths that requires a log be kept of all replacements and any deviations from that requirement.

Condition 6.1.7c defines as an excursion any failure to comply with Condition 3.5.1, replacement of filter media in the paint booths.

Condition 6.2.1 requires the submittal of the facility's method of compliance with 40 CFR 63, Subpart M MMM – *Surface Coating of Miscellaneous Metal Parts and Products* by June 2, 2006.

Condition 6.2.2 requires a log be kept stating the date and time that each paint booth filter media is replaced. Any deviation from the replacement schedule is also required to be noted in the log.

Conditions 6.2.3 through 6.2.5 require records to be kept of VOC usage and monthly and yearly emission rolling total be kept.

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. Prevention of Accidental Releases
Not Applicable.
- J. Stratospheric Ozone Protection Requirements
Not Applicable.
- K. Pollution Prevention
Not Applicable.
- L. 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 review started on July 20, 2005 and ended on August 20, 2005. Comments were not received by the Division.