

Facility Name: **Horton Vans, Inc.**

City: Eatonton

County: Putnam

AIRS #: 04-13-237-0132

Application #: 16805

Date SIP Application Received: N/A

Date Title V Application Received: June 30, 2006

Permit No: 3792-237-0132-V-01-1

Program	Review Engineers	Review Managers
SSPP	Katie Gregory	Eric Cornwell
SSCP	Sherry Waldron	Karen Hays
ISMP	Sid Stephens	Richard Taylor
TOXICS	Sherry Waldron	Karen Hays

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
3792-237-0132-V-01-0		X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3792-237-0132-V-01-0	Initial Title V Permit

B. Regulatory Status

1. PSD/NSR/RACT

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, and 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. Horton Vans is not a major source for PSD.

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

The facility requested a 100 ton per year VOC in the Initial Title V Permit.

II. Proposed Modification

A. Description of Modification

The Title V Permit was opened-for-cause by the Division to implement the requirements of 40 CFR 63, Subpart M MMM for miscellaneous metal parts coating, which has a compliance date of January 2, 2007.

B. Emissions Change

No emissions should change due to the addition of the requirement of 40 CFR 63, Subpart M MMM.

C. PSD/NSR Applicability

The facility is not a major source for PSD/NSR. There are no emissions increases associated with this modification to the Title V Permit.

III. Facility Wide Requirements

No facility wide requirement were changed or added in this amendment.

A. Emission and Operating Caps:

Not Applicable.

B. Applicable Rules and Regulations

Not Applicable.

C. Compliance Status

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

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

Condition 2.2.2 was modified to include the compliance date of 40 CFR 63, MMMM, which is the date the permit conditions regarding this regulation are to be in effect at the facility.

IV. Regulated Equipment Requirements

A. Brief Process Description

The Title V Permit No. 3792-237-0132-V-01-0 was opened-for-cause to include conditions pertaining to 40 CFR 63 Subpart M MMM - *Surface Coating of Miscellaneous Metal Parts and Products*.

B. Equipment List for the Process

There were no changes in equipment due to this modification.

C. Equipment & Rule Applicability

Emission and Operating Caps –
Not Applicable.

Applicable Rules and Regulations -

The facility is subject to 40 CFR 63, Subpart M MMM, *Surface Coating of Miscellaneous Metal Parts and Products*. The facility has submitted a notification dated June 2, 2006 stating their intent to comply with this regulation through the Emission Rate Without Add-on Controls Option.

D. Compliance Status

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

E. Operational Flexibility

Not Applicable.

F. Permit Conditions

Conditions 3.3.1 through 3.3.3 were added stating the general use coating emission limit and the compliance options as stated in the federal regulation.

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

Condition 4.1.3 was modified to include the Test Methods stated in the federal regulation, which would apply to the compliance options stated in the regulation including the option Horton Vans requested.

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

A. Individual Equipment:

There were no changes made to any monitoring requirements in this amendment.

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

There were no changes made to any monitoring requirements in this amendment.

VII. Other Record Keeping and Reporting Requirements

Conditions 6.2.6 – 6.2.17 were added in the amendment. These conditions cover the recordkeeping and reporting required under the Compliant Materials Option and the Emission Rate Without Controls Option.

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

- A. Operational Flexibility – Not applicable.
- B. Alternative Requirements – Not applicable.
- C. Insignificant Activities – Not applicable.
- 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.

Addendum to Narrative

The 30-day public review started on October 12, 2006 and ended on November 13, 2006. Comments were not received by the Division.