

Facility Name: Bathcraft, LLC  
City: Valdosta  
County: Lowndes  
AIRS #: 04-13-185-00073

Application #: TV-655135  
Date Application Received: April 19, 2022  
Permit No: 3088-185-0073-V-08-0

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## Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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 (CAA). 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 CAA. The 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: Bathcraft, LLC
2. Parent/Holding Company Name

Bathcraft, LLC

3. Previous and/or Other Name(s)

BathCraft, Inc.  
New BathCraft, Inc.  
Jacuzzi, Inc.  
D&H Enterprises

4. Facility Location

1610 James P. Rogers Drive  
Valdosta, GA 31601

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

Bathcraft, LLC (hereinafter "facility") is located in Lowndes County, which is an attainment area for 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
3088-185-0073-V-07-0	October 23, 2017	Title V Renewal Permit
3088-185-0073-V-07-1	January 30, 2018	502(b)10 permit change to construct and operate a new fiberglass manufacturing line
Off-Permit Change	October 5, 2021	This Off-Permit change is for the installation of resin lamination booths LM06, LM07, and LM08.

## D. Process Description

### 1. SIC Codes(s)

2421

The SIC Code(s) identified above were assigned by the Environmental Protection Division's (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 manufactures fiberglass bathtubs.

### 3. Overall Facility Process Description

The facility manufactures gel coat surface bathtubs and acrylic surface bathtubs, both types are fiberglass reinforced. Whirlpool motors and tubing are installed on approximately 40% of the units. In the gel coat plant, the tub mold is sprayed with gel coat in Gel Coats GC02 and GC03. Then it is laminated with chopped fiberglass and resin in Resin Lamination Booths LM03 and LM04. In the acrylic plant, the vacuum oven forms the outer shell of the tub by heating a sheet of acrylic and then vacuum-forming it onto a mold. The acrylic shell is then laminated with chopped fiberglass and resin in Resin Lamination Booth LM05 and LM06. A second lamination may occur in Resin Lamination Booth LM07 and LM08. When necessary, mold repair takes place in Mold Repair MR02.

### 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 in Lowndes County, an attainment area for all criteria pollutants; therefore, New Source Review (NSR) does not apply.

The facility is not one of the 28 named source categories under Prevention of Significant Deterioration (PSD) regulations. The facility has accepted a 249 ton per year limit on Volatile Organic Compounds (VOC). Moreover, emissions of all other criteria air pollutants are below the PSD major source thresholds. Therefore, the facility is a minor source under PSD regulations.

## 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 <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes	✓		
NO <sub>x</sub>	Yes			✓
CO	No			
TRS	No			
H <sub>2</sub> S	No			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		
Total Greenhouse Gasses	Yes			✓

## 3. MACT Standards

Since the facility is a major source for single and combined hazardous air pollutants (HAP), the facility is subject to the Maximum Achievable Control Technology (MACT) standards of 40 CFR 63 Subpart WWWW, "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The facility is considered existing according to the MACT standard. Please refer to Section III.B. of this narrative for more detailed discussions.

## 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:**

The facility is subject to a federally enforceable VOC emissions cap of 249 tpy per any consecutive 12-month period. This emission limit was imposed at the company's request in order to avoid PSD applicability.

**B. Applicable Rules and Regulations**

Not applicable.

**C. Compliance Status**

The facility did not indicate any non-compliance issues for any regulated equipment in this permit application, and the facility's most recent compliance inspection, annual compliance certification, and semiannual compliance report indicate that the facility was in compliance with the Title V permit.

**D. Permit Conditions**

Condition 2.1.1 limits VOC emissions from the entire facility to 249 tpy.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
GC02	Gel Coat #2	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
GC03	Gel Coat #3	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM03	Resin Lamination Booth #3	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM04	Resin Lamination Booth #4	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM05	Resin Lamination Booth #5	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM06	Resin Lamination Booth #6	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM07	Resin Lamination Booth #7	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
LM08	Resin Lamination Booth #8	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters
MR02	Mold Repair #2	40 CFR 63, Subpart A 40 CFR 63, Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	Filters

#### B. Equipment & Rule Applicability

##### *40 CFR 63 Subpart A – General Provisions*

The Gel Coaters, Resin Lamination Booths, and Mold Repair #2 are subject to general provisions as stated in Condition 3.3.1.

##### *40 CFR 63 Subpart WWWW - National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*

The Gel Coaters, Resin Lamination Booths, and Mold Repair #2 are subject to this standard, as existing sources, molding operations conducted using the equipment are subject to the organic HAP emission limits specified in Table 3 to 40 CFR 63 Subpart WWWW. Cleaning, HAP containing materials storage, and mixing operations conducted using the equipment is subject to the work practice standards specified in Table 4 to 40 CFR 63 Subpart WWWW.

Per 40 CFR 63.5790(c), application of mold sealing and release agents; mold stripping and cleaning; repair of parts not manufactured (including parts not routinely manufactured) at the facility; personal activities that are not part of the manufacturing operations; “prepreg materials” as defined in 40 CFR 63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding) are exempted from 40 CFR 63 Subpart WWWW.

The following Georgia Rules apply to Gel Coats GC02 and GC03, Resin Lamination Booths LM03 through LM08, and Mold Repair MR02:

- Georgia Rule 391-3-1-.02(2)(b) – The Gel Coaters, Resin Lamination Booths, and Mold Repair #2 are subject to a 40% opacity visible emissions limit.
- Georgia Rule 391-3-1-.02(2)(e) – The aforementioned equipment is subject to the particulate matter (PM) emission limit formula stated as follows:

$$\begin{aligned} E &= 4.1 * P^{0.67} && \text{for process input weight rate up to and including 30 tons per hour.} \\ E &= 55 * P^{0.11} - 40 && \text{for process input weight rate above 30 tons per hour.} \end{aligned}$$

Where:

E equals the allowable PM emission rate in pounds per hour and,  
P equals the process input weight rate in tons per hour.

Emission and Operating Caps:

As specified in the previous section, Gel Coaters GC02 and GC03, Resin Lamination Booths LM03, LM04, LM05, LM06, LM07, and LM08, and Mold Repair #2 MR02 are subject to the organic HAP emission limits specified in Table 3 to 40 CFR 63 Subpart WWWW, which specifies a lb. HAP per ton of resin applied limit depending on operation type and resin application method.

Rules and Regulations Assessment:

As a major source of styrene (a HAP), with an estimated 5-year average actual HAP emission rate of 225 tpy, the facility is considered a major source of HAP per 40 CFR 63.5795. Because the facility was constructed before August 2, 2001, it is considered an existing source under 40 CFR 63 Subpart WWWW.

### C. Permit Conditions

Condition 3.3.1 requires compliance with 40 CFR 63 Subpart A and Subpart WWWW.

Condition 3.3.2 lists operations which may occur at the facility that will not be regulated under 40 CFR 63 Subpart WWWW.

Condition 3.3.3 lists the 12-month rolling average organic HAP emission limits for each open molding operation type.

Condition 3.3.4 lists the work practice standards the facility must comply with regarding new or existing cleaning operations, organic HAP-containing material storage operations, and all mixing operations.

Condition 3.4.1 lists Georgia Rule (b) requirements.

Condition 3.4.2 lists Georgia Rule (e) requirements.

Condition 3.5.1 requires the gel coat and resin operation filters to be changed at least once per week of operation. This filter change rate was requested of the facility, rather than the previous rate of once every 2 weeks, because it better reflects the facility's actual filter change practices. Due to a second production line with Gel Coats GC02 and GC03, Resin Lamination Booths LM03, LM04 and LM05, and Mold Repair #2 MR02 replacing the first production line per Application No. 195300, and due to the installation of Resin Lamination Booths LM06, LM07, and LM08 per Application No. 28083, this condition has been updated to replace and add the listed emission units.

Existing Condition 3.5.2 required filter changes at least once per week of operation for the equipment authorized in Application No. 195300. Because the requirements of this condition have been incorporated into Condition 3.5.1, existing Condition 3.5.2 has been removed.

**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**

Not 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

Condition 5.2.1 requires a weekly inspection to verify that containers of HAP (styrene) are covered during periods of non-use. The date and time of each inspection is required to be kept in a log. This condition is necessary for compliance with the material storage work practice standards in Condition 3.3.4. This condition has also been updated to list the equipment authorized in Application No. 195300.

Existing Condition 5.2.2 required visible inspection of the equipment authorized in Application No. 195300. Because the requirements of this condition have been incorporated into Condition 5.2.1, existing Condition 5.2.2 has been removed.

### C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant (PM). [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (PM) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

For Gel Coats GC02 and GC03, Resin Lamination Booths LM03, LM04, LM05, LM06, LM07, and LM08, and Mold Repair MR02:

- All of these equipment pieces are located at the facility, which is a major source that has a Title V permit.
- The equipment pieces are also all subject to the GA Rule (e) PM emission limits.
- The facility does not require a control device to achieve compliance on any of its equipment pieces.

Since the facility does not need any control device for any of their equipment pieces to achieve compliance with the GA Rule (e) limits, the facility is not subject to the CAM requirements.

## **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.

The citation for Condition 6.1.7 had removed reference to 40 CFR 63.5805(b) as part of the processing of Application No. 195300. Because reporting requirements from 40 CFR 63.5805(b) are included in Condition 6.1.7, the citation for Condition 6.1.7 has been modified to re-include 40 CFR 63.5805(b).

Condition 6.1.7b.i. requires reporting of any twelve-month period where the total VOC emissions from the entire facility exceed 249 tons as an exceedance.

Condition 6.1.7b. ii. requires reporting of any twelve-month period during which the total organic HAP emissions from the activities specified in Table 3.3.3-1 exceed the limits presented in the table as an exceedance.

Condition 6.1.7c.i. requires reporting of any failure to follow the work practice standards relating to cleaning operations, HAP-containing materials storage, and mixing operations as detailed in Condition 3.3.4 as an excursion.

Condition 6.1.7c.ii. requires reporting of any failure to follow the gel coat and resin filter replacement schedule detailed in Condition 3.5.1 as an excursion.

Existing Condition 6.1.7c.iii. required reporting of failure to comply with Condition 3.5.2. Because Condition 3.5.2 was removed, existing Condition 6.1.7c.iii was removed as well.

Condition 6.1.7d.i. requires reporting of any failure to perform weekly container inspections as detailed in Condition 5.2.1 in the semiannual report.

Existing Condition 6.1.7d.ii. requires reporting of any monthly total of VOC emissions exceeding 20.8 tons. Since this is required in Condition 6.2.2, the same requirement is no longer included in Condition 6.1.7d.

Existing Condition 6.1.7d.iii. required reporting of failure to comply with Condition 5.2.2. Because Condition 5.2.2 was removed, existing Condition 6.1.7d.iii was removed as well.

## B. Specific Record Keeping and Reporting Requirements

### Avoidance of PSD (40 CFR Part 52.21)

Condition 6.2.1 requires the maintenance of usage records for all VOC-containing materials utilized at the facility.

Condition 6.2.2 requires the calculation of the monthly VOC emissions from the facility using the provided equations and the procedures specified in Appendix H of the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**. If the monthly VOC emissions from the facility equal or exceed 20.8 tons, sending a notification to the Division is required.

Condition 6.2.3 requires the calculation of the 12-month rolling total VOC emissions from the facility for each month. If the 12-month rolling total VOC emissions exceed 249 tons during any consecutive 12-month period, sending a notification to the Division is required.

### 40 CFR 63 Subpart WWWW Requirements

Condition 6.2.4 describes the information sources and methods to be used to determine the organic HAP content of the gel coats and resins used at the facility.

Condition 6.2.5 provides four different methods by which the facility can meet the open molding operations standards in Condition 3.3.3. Because several definitions in Condition 6.2.5e. are defined in 40 CFR 63.5935, the citation for Condition 6.2.5 has been modified to include 40 CFR 63.5935.

Condition 6.2.6 describes how continuous compliance with the applicable organic HAP emission limits in Condition 3.3.3 shall be demonstrated.

Condition 6.2.7 describes how continuous compliance with the applicable organic HAP content limits in Condition 6.2.5d. shall be demonstrated.

Condition 6.2.8 requires compliance with the work practice standards listed in Condition 3.3.4.

Condition 6.2.9 requires maintaining records of resin and gel coat usage, organic HAP content, and type of operation in which each resin and gel coat is used when complying with the organic HAP emission limits in Condition 3.3.3, or when complying with the organic HAP content limits in Condition 6.2.5d. by averaging organic HAP contents.

Condition 6.2.10 describes the record keeping required for individual resins and gel coats that comply with the organic HAP emission limits in Condition 3.3.3.

Condition 6.2.11 lists the notifications and reports that must be submitted to the Division. The Environmental Protection Agency (EPA) determined that notification if actions taken in the event of a startup, shutdown, or malfunction were consistent with those specified in the facility's startup, shutdown, and malfunction plan is unnecessary during the residual risk and technology review (RTR). Therefore, the EPA proposed that 40 CFR 63.5910(c)(4) be removed and reserved in 84 Federal Register (FR) 22642. This was finalized in 85 FR 15975. Thus, Existing Condition 6.2.11b.iv has been replaced with new Condition 6.2.11b.iv.

Condition 6.2.12 describes the requirements when any of the information submitted in any notification is changed.

Condition 6.2.13 describes the written records that must be maintained at the facility.

Condition 6.2.14 describes how records related to compliance with 40 CFR 63 Subpart WWWW shall be maintained.

#### Other Record Keeping and Reporting Requirements

Condition 6.2.15 requires maintaining a log of the filter changes required for the gel coat and resin operations in Condition 3.5.1.

Existing Condition 6.2.16 required maintaining a log of filter changes required for the gel coat and resin operations in existing Condition 3.5.2. Because existing Condition 3.5.2 was removed, existing Condition 6.2.16 was removed as well.

## **VII. Specific Requirements**

### **A. Operational Flexibility**

Not applicable.

### **B. Alternative Requirements**

Not applicable.

### **C. Insignificant Activities**

See Permit Application on GEOS website.  
See Attachment B of the permit.

### **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**

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility has indicated in their application that they do not have air conditioners and/or refrigeration equipment that use CFCs, HFCs, or other stratospheric ozone-depleting substances.

**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.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to define the applicability of the Boiler MACT more clearly or GACT for major or minor sources of HAP.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//