



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Oldcastle Precast, Inc.
Facility Address: 3300 New McEver Rd
Acworth, Georgia 30101, Cobb County
Mailing Address: 3300 New McEver Rd
Acworth, Georgia 30101
Facility AIRS Number: 04-13-067-00271

is issued a Permit for the following:

Operation of a liquid composite molding facility.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 26877 dated December 10, 2018; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 7 pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not discharge, or cause the discharge into the atmosphere, from the entire facility, volatile organic compounds (VOC) in an amount equal to or exceeding 45.3 tons during any consecutive 12-month period.
[RACT Analysis and 40 CFR 51.165]
- 2.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.
[391-3-1-.02(2)(b)1.]

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- 2.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)1.]

a. $E = 4.1P^{0.67}$, for process input weight rate up to and including 30 tons per hour;

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

- 2.4 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

- 2.5 The Permittee shall use the best practice in the workplace as following:
[391-3-1-.02(2)(tt) - RACT]

- a. Use HVLP spray guns for application of mold release agent.
- b. Facility shall only use Acrastrip or similar VOC content product in the mold cleaning operation from November 15 through March 15.
- c. VOC content of mold release agent shall not exceed 20% by weight.
- d. Covering containers of mold cleaning chemicals when not in use;

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- e. Minimizing overspray of chemicals containing VOC;
 - f. Storing and disposing of used solvent and shop towels;
 - g. Maintaining cleaning equipment;
 - h. Repairing solvent leaks.
 - i. Monitor air pressure for HVLP guns.
- 2.6 The Permittee shall not transfer, cause, or allow the transfer of any volatile organic liquid other than gasoline from any delivery vessel into storage tanks of greater than 4,000 gallons, unless such tanks are equipped with submerged fill pipes.
[391-3-1-.02(2)(vv)]
- 2.7 The Permittee shall not let, permit, suffer, or allow the operation of the mixing tanks, unless the following requirements for the control of emissions of volatile organic compounds are satisfied:
[391-3-1-.02(2)(ccc)]
- a. All portable and stationary mixing tanks used for the manufacture of any VOC-containing material shall be equipped with covers which completely cover the tank except for an opening no larger than necessary to allow for safe clearance of the mixer shaft. The tank opening shall be covered at all times except when operator access is necessary.
 - b. Free fall of VOC-containing material into product containers shall be accomplished by utilization of drop tubes, fill pipes, or low-clearance equipment design on filling equipment unless demonstrated to the Division impractical for a specific operation.
 - c. Detergents or non-VOC-containing cleaners shall be utilized for both general and routine cleaning operations of floors, equipment, and containers unless the cleanup cannot be accomplished without the use of VOC containing cleaners.
 - d. All waste solvents shall be stored in closed containers or vessels, unless demonstrated to be a safety hazard, and such solvents shall be disposed or reclaimed in a manner approved by the Division.
- 2.8 The Permittee shall operate the Camfil baghouse (CBAT) at all times whenever the associated equipment is being operated.
[391-3-1-.03(2)(c)]

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2.9 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standard of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s).
[40 CFR 60.4230]

2.10 The Permittee shall not cause, suffer, permit, or allow the operation of the emergency generators to exceed 200 hours, each, during any twelve consecutive months.
[Avoidance of Georgia Rule (mmm)]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

3.2 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions, and shall store all VOC-laden cleaning materials – including shop towels, rags and mop heads – in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition.

4. Process & Control Equipment

4.1 The Permittee shall maintain a sufficient supply of spare filter media for the Camfil baghouse (CBAT) to ensure availability when replacement is needed.

5. Monitoring

5.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

5.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

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- a. Pressure drop across the Camfil baghouse (CBAT) to ensure proper operation as specified in Condition 2.6 once each week or portion of each week that the Camfil baghouse (CBAT) is in operation. A checklist or other similar log may be used for this purpose.
- 5.3 Once each day, or portion of each day of operation, the Permittee shall perform a check for visible emissions from the Camfil baghouse (CBAT) and inspect emissions units for mechanical problems or malfunction. For any observation of visible emissions, mechanical problems, or malfunctions, the Permittee shall take corrective action and reinspect the equipment to verify that no visible emissions exist and that any mechanical problems or malfunctions have been corrected. The observations and corrective actions shall be recorded in a log and maintained in a condition suitable for inspection by, or submittal to, the Division.
[391-3-1-.02(6)(b)1]
- 5.4 The Permittee shall maintain a record of the design specifications of the equipment that show the mixing tanks are equipped with covers and proper filling equipment (i.e. drop tubes, fill pipes, or low clearance equipment design). These documents shall be available for inspection or submittal. In addition, the Permittee shall conduct a weekly inspection of all equipment to ensure that waste solvents are stored in closed containers. A record of said inspections shall be maintained in the form of a checklist available for inspection or submittal.
[391-3-1-.02(2)(ccc), 391-3-1-.02(6)(b)1]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
 - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

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- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain monthly usage records of all VOC containing materials used in entire facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the volatile content of waste materials from the VOC emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the VOC content of the containerized waste material, and documentation of the method for determining the VOC content of the waste material. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.
[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]
- 7.2 The Permittee shall use the methodologies described in AP-42 4.4 Polyester Resin Plastic Products Fabrication which refers to ANSI/ACMA/ICPA UEF-1-2004, as updated in 2011 UEF-1-2011a Estimating Emission Factors from Open Molding Composite Processes and Other Composite Processes ("UEF") document for calculation of the fiberglass processing steps. For other cleaning operations, the Permittee shall use the EIIP document, "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities," and the monthly usage records required in Condition 7.1 to calculate total monthly volatile organic compound emissions. Copies of each month's emissions calculations (including documentation of variables and parameters) shall be kept on site in a form suitable for inspection and/or submittal to the Division. The Permittee shall notify the Division in writing if the volatile organic compound emissions exceed 3.77 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1.
[391-3-1-.02(6)(b)(1)]
- 7.3 The Permittee shall use the monthly VOC emission data required in Condition 7.2 to calculate the combined 12-month rolling total VOC emissions from the facility for each calendar month. The Permittee shall notify the Division in writing if the 12-month rolling total of VOC emissions equals or exceeds 45.3 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.1.
[391-3-1-.02(6)(b)1 and 391-3-1.03(2)(c)]

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- 7.4 The Permittee shall maintain records of monthly hours of operation for each emergency generator in Equipment Group EG. The Permittee shall use the monthly operating records to calculate the 12-month rolling total engine operating hours for each emergency generator in Equipment Group EG. The Permittee shall notify the Division in writing if the 12-month rolling total for any engine exceeds 200 hours during any 12-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the operating hours limit in Condition 2.10.
[391-3-1-.02(6)(b)1]

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.