

Facility Name: **Geiger International, Inc.**

City: Atlanta

County: Fulton

AIRS #: 04-13-121-00558

Application #: TV-43781

Date SIP Application Received: November 30, 2016

Date Title V Application Received: November 30, 2016

Permit No: 2521-121-0558-V-04-1

Program	Review Engineers	Review Managers
SSPP	Dawn Wu	Manny Patel
SSCP	n/a	n/a
ISMU	Joshua Pittman	Dan McCain
TOXICS	Sherry Waldron	Michael Odom
Permitting Program Manager		Eric Cornwell

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.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2521-121-0558-V-04-0	7/14/2016	Title V Permit Renewal
Off-Permit Change	10/17/2016	Construction and operation of a new Edge Coater 1 (EC01) that replaces the existing Edge Coaters (EC02 and EC03).
Off-Permit Change	12/12/2016	Reconfiguration of the existing UV coating line (Source Code ID No. UV01).

B. Regulatory Status**1. PSD/NSR/RACT**

The facility is located inside the ozone non-attainment area. The major source threshold for the Atlanta non-attainment area is 25 tons per year. Geiger International, Inc. is proposing to reduce the facility-wide VOC emissions limit from 100 tons/year to 25 tons/year in this modification. Therefore, the new limit will make Geiger International, Inc. a synthetic minor NSR source.

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 ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes		✓	
NO _x	Yes			✓
CO	Yes			✓
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		✓
Total HAPs	Yes	✓		✓

II. Proposed Modification

A. Description of Modification

Geiger International, Inc. is proposing to reduce the facility-wide VOC emissions limit from 100 tons/year to 25 tons/year.

B. Emissions Change

The facility-wide VOC emissions limit has been reduced from 100 tons/year to 25 tons/year.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	n/a	n/a
PM ₁₀	Yes	n/a	n/a
PM _{2.5}	Yes	n/a	n/a
SO ₂	Yes	n/a	n/a
VOC	Yes	n/a	-75
NO _x	Yes	n/a	n/a
CO	Yes	n/a	n/a
TRS	N/A	n/a	n/a
H ₂ S	N/A	n/a	n/a
Individual HAP	Yes	n/a	n/a
Total HAPs	Yes	n/a	n/a

C. PSD/NSR Applicability

The potential VOC emissions from the facility were 100 tons per year as limited by Title V Permit Number # 2521-121-0558-V-04-0. The major source threshold of VOCs for the Atlanta non-attainment area is 25 tons per year. Geiger International, Inc. is proposing to reduce the facility-wide VOC emissions limit from 100 tons/year to 25 tons/year in this modification. The new limit will make Geiger International, Inc. a synthetic minor NSR source.

III. Facility Wide Requirements

A. Emission and Operating Caps:

Geiger International, Inc. has requested to reduce the facility-wide VOC emissions limit from 100 tons/year to 25 tons/year

B. Applicable Rules and Regulations

Since the facility becomes a synthetic minor NSR source, Georgia VOC Rule (hhh) Wood Furniture Finishing and Cleaning Operations is no longer applicable.

The facility is still subject to 40 CFR Part 63, Subpart JJ – *National Emission Standards for Wood Furniture Manufacturing Operations*.

C. Compliance Status

Unchanged.

D. Permit Conditions

Condition 2.1.1 has been modified to change the VOC limit from 100 tpy to 25 tpy.

IV. Regulated Equipment Requirements

A. Brief Process Description

The facility receives several shapes and sizes of particleboard, veneers, and natural wood. The facility first cuts, trims, and covers the wooden pieces (particle board) with veneer. The pieces are sanded and assembled as necessary. The facility utilizes three separate process lines: one for stained product, one line for natural products for cases and one line for natural products for flat parts. For stained products, case good components are stained via hand application techniques (stains emit toluene, xylenes, and other VOCs) Excess satin is wiped away with rags and the case goods are sent to the stain/shade sealer booth to add additional color. Sealers are the last material applied to the products. The sealed products are transferred to the topcoat line.

Natural wood products in case forms are sent to the shade/sealer booth where sealer is applied. Product is then transferred to the topcoat line. Natural wood products in flat form are sent to the edge coater and roll coater line (utilizes coating that are less than 0.1% VOC) where the sealer is applied and cured by UV lamps. Product is then transferred to the topcoat line.

The topcoat line is separated into three processes: one for case components (built cases); one for flat components; and one line for work surfaces.

The case components are dried by infrared lights, sanded and then enter the topcoat tunnel where a water based urethane clear coat is applied. The cases enter a drying tunnel for 20 minutes, are sanded and then pass through the topcoat tunnel where a second coat of water based urethane clear coat is applied. The cases reenter the drying tunnel for 20 minutes and are then transferred to final assembly.

Flat parts are transferred to the edge coater and roll coater line (utilizes coatings that are less than 0.1% VOC) where they are sanded, topcoat is applied and cured by UV lamps, and then transferred to final assembly.

Work surfaces are sanded and placed onto the topcoat line where they enter the topcoat booth and a urethane clear coat is applied. The work surfaces then enter a drying room where they stand for 24 hours before being transferred to the final assemble area.

B. Updated Equipment List for the Process

The facility decided to regroup the operations into several groups.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
WW01	Woodworking	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.15	APC8, APC9, APC10	Dust Collection System
MISC	Misc Group including Adhesive etc.	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A
SCG	Stain Coating Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A
DB	Dry Coating Booth Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.6, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.14, 6.2.15		Fiberglass Filters
WB	Wet Coating Booth Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 3.5.1, 3.5.3, 5.2.1, 5.2.5, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		Water Wash System
UVG	UV Line Group	40 CFR 63 Subpart JJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 through 3.3.13, 3.4.1, 3.4.2, 5.2.1, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.9, 6.2.10, 6.2.11, 6.2.15		N/A

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

C. Equipment & Rule Applicability

Emission and Operating Caps

VOC limit of 5 tons/yr on Topcoat Booth PS06 has been removed since the facility has requested the facility-wide VOC emissions limit to 25 tons/year. The new limit makes Geiger International, Inc. a synthetic minor NSR source for VOCs.

Applicable Rules and Regulations

Rules and Regulations Assessment:

Since the facility becomes a synthetic minor NSR source, Georgia VOC Rule (hhh) Wood Furniture Finishing and Cleaning Operations is no longer applicable.

Emission and Operating Standards:

Rule (hhh) conditions have been removed.

D. Permit Conditions

Permit Condition 3.2.1 has been deleted.

Permit Condition 3.4.3 and 3.4.4 have been deleted.

Permit Condition 3.5.3 has been modified to replace Emission Unit ID No. PS04 with Emission Group ID No. WB.

Permit Condition 3.5.4 has been added to request the facility keeps a copy of Attachment D on site for the compliance inspection.

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

Unchanged.

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

Permit Condition 5.2.4 has been modified to replace Emission Unit ID No. PS04 with Emission Group ID No. WB.

VII. Other Record Keeping and Reporting Requirements

Permit Conditions 6.1.7(b)(i) has been modified to 25 tpy.

Permit Conditions 6.1.7(b)(xi) and (xiii) has been deleted.

Permit Condition 6.1.8 has been deleted since the facility becomes a synthetic minor source for VOCs.

Permit Condition 6.2.3 has been modified from 8.33 tons to 2.08 tons.

Permit Condition 6.2.4 has been modified from 100 tpy to 25 tpy.

Permit Condition 6.2.5 has been modified and starting with “If complying with Condition 3.3.6b,”

Permit Conditions 6.2.12 and 6.2.13 have been deleted since Rule (hhh) is no longer applicable.

Permit Conditions 6.2.16, 6.2.17, and 6.2.18 have been deleted since the facility becomes a synthetic minor source for VOCs.

VIII. Specific Requirements

A. Operational Flexibility

Permit Condition 7.1.2 has been added to give the facility operational flexibility to relocate existing emissions units inside the same facility, as long as the potential to emit of the equipment will not be affected.

B. Alternative Requirements

The facility has not requested any new alternative requirements under Rule 391-3-1-.03(10)(d)8 to combine multiple overlapping of state and federal requirements.

C. Insignificant Activities

None applicable.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None 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.