

PERMIT AMENDMENT NO. 3088-135-0239-V-03-2

ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: AGCO, Inc.
Facility Address: 2782 Simpson Circle
Norcross, Georgia 30071, Gwinnett County
Mailing Address: 2782 Simpson Circle
Norcross, Georgia 30071
Parent/Holding Company: AGCO, Inc.
Facility AIRS Number: 04-13- 135-00239

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The addition of two gel coat spray booths (EP06 and EP07) and equipment to pour and process cultured marble product in existing buildings.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment 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 Amendment and Permit No. **3088-135-0239-V-03-0**. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment 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 App No. **330687** dated **February 25, 2019**; any other applications upon which this Amendment or Permit No. **3088-135-0239-V-03-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **9** pages.



Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The purpose of this amendment is to install and operate two new gel coat booths (EP06 and EP07). Polyester resin containing styrene will be applied to open molds in the new gel coat booths. Particulate emissions will be controlled by filter banks GF06 and GF07 respectively. The new gel coat booths are not intended to increase facility wide VOC and HAP emissions.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

Unchanged.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EP05	Gel Coat Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 - 3.3.4, 3.4.1 - 3.4.3, 3.5.1, 5.2.1, 5.2.2, 6.2.1 - 6.2.6, 6.2.10 - 6.2.20	GF05	Gel Coat Booth Filters
EP06	Gel Coat Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 - 3.3.4, 3.4.1 - 3.4.3, 3.5.1, 5.2.1, 5.2.2, 6.2.1 - 6.2.6, 6.2.10 - 6.2.20	GF06	Gel Coat Booth Filters
EP07	Gel Coat Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 - 3.3.4, 3.4.1 - 3.4.3, 3.5.1, 5.2.1, 5.2.2, 6.2.1 - 6.2.6, 6.2.10 - 6.2.20	GF07	Gel Coat Booth Filters
FE06	Area where a matrix of resin, calcium carbonate and catalyst is mixed and poured into gel coated open molds.	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 - 3.3.4, 3.4.1, 3.4.2, 5.2.1, 6.2.1-6.2.6, 6.2.10 - 6.2.20	None	None
FE07	Area where a matrix of resin, calcium carbonate and catalyst is mixed and poured into gel coated open molds.	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart WWWW	2.1.1, 3.3.1 - 3.3.4, 3.3.4, 3.4.1, 3.4.2, 5.2.1, 6.2.1 - 6.2.6, 6.2.10 - 6.2.20	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

Removed Condition:

3.2.1 [DELETED]

3.3 Equipment Federal Rule Standards

None Applicable.

3.4 Equipment SIP Rule Standards

Modified Condition:

- 3.4.4 The Permittee shall maintain a controlled spray technique program for all gun operators in Emission Units EP01, EP04, EP05, EP06, and EP07.
[391-3-1-.02(2)(tt), VOC RACT]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Modified Condition:

- 3.5.1 The Permittee shall ensure that the particulate matter emissions from Process Groups EP01, EP04, EP05, EP06, and EP07 are controlled by filter systems GF01, GF02, GF05, GF06, and GF07. These filter systems shall be operated and maintained according to the manufacturer's specifications. The filters shall be replaced when the pressure drop, as recorded in Condition 5.2.2, exceeds the range established by the manufacturer.
[391-3-1-.02(2)(a)(10)]

PART 4.0 REQUIREMENTS FOR TESTING

4.2 Specific Testing Requirements

None applicable.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.1 General Monitoring Requirements**

- 5.1.1 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.
[391-3-1-.02(6)(b)1]

5.2 Specific Monitoring RequirementsModified Condition:

- 5.2.1 The Permittee shall perform an inspection at least once per week of operations to verify that all containers associated with resin and gel coat operations (Emission Unit ID Nos. EP01, EP04, EP05, EP06, EP07, FE01, FE02, FE03, FE04, FE06, and FE07) containing HAP are covered during periods of non-use. The Permittee shall keep a log indicating the date and time of inspection.
[391-3-1-.02(6)(b)1]

Modified Condition:

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. The pressure drop across each of the filter systems GF01, GF02, GF05, GF06, and GF07. Data shall be recorded once per day of operation.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.2 Specific Record Keeping and Reporting Requirements**Modified Condition:

6.2.2 The Permittee shall use the monthly usage records required by Condition 6.2.1 to calculate the total facility-wide monthly volatile organic compound emissions. The Permittee shall use the procedures specified in Appendix H of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants to calculate VOC emissions from the facility's gel coat, lamination, and surface coating operations (Process Groups EP01, EP04, EP05, EP06, EP07, FE01, FE02, FE03, FE04, FE06, and FE07). All calculations should be kept as part of the monthly record. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record. The following equations shall be used to calculate VOC emissions from any other operations:

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(A)(3)(i)]

- a. $\text{VOC (lbs)} = \text{Material use (lbs)} * (\% \text{ weight VOC}) * \text{Emission Factor}; \text{ or}$
- b. $\text{VOC (lbs)} = \text{Material used (gallons)} * (\text{VOC Content lbs/gallon}) * \text{Emission Factor}$

The Permittee shall notify the Division in writing if volatile organic compound emissions exceed 4.1 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 2.1.1.

Modified Condition:

6.2.5 The Permittee shall use the monthly usage records required by Condition 6.2.4 to calculate the total facility-wide monthly hazardous air pollutants emissions. The Permittee shall use the procedures specified in Appendix H of the Division's *Procedures for Testing and Monitoring Sources of Air Pollutants* to calculate HAP emissions from the facility's gel coat, lamination, and surface coating operations (Process Groups EP01, EP04, EP05, EP06, EP07, FE01, FE02, FE03, FE04, FE06, and FE07). All calculations should be kept as part of the monthly record. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record. The following equations shall be used to calculate HAP emissions from any other operations:

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(A)(3)(i)]

- a. $\text{HAP (lbs)} = \text{Material use (lbs)} * (\% \text{ weight HAP}) * \text{Emission Factor}; \text{ or}$
- b. $\text{HAP (lbs)} = \text{Material used (gallons)} * (\text{HAP Content lbs/gallon}) * \text{Emission Factor}$

The Permittee shall notify the Division in writing if hazardous air pollutants emissions exceed 4.1 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.1 Operational Flexibility

Not Applicable

7.2 Off-Permit Changes Associated with this Amendment

7.3 Alternative Requirements Associated with this Amendment

[White Paper #2]

Not Applicable

7.4 Insignificant Activities Associated with this Amendment

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources Associated with this Amendment

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable

7.6 Short-term Activities Associated with this Amendment

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

Not Applicable

7.7 Compliance Schedule/Progress Reports Associated with this Amendment

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable.

7.8 Emissions Trading Associated with this Amendment

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

7.9 Acid Rain Requirements Associated with this Amendment

Not Applicable

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits and Amendments are subsumed by this permit and are hereby revoked:

Air Quality Permit Number(s)	Dates of Original Permit Issuance or Amendment
n/a	n/a

7.13 Pollution Prevention Associated with this Amendment

Not Applicable

7.14 Specific Conditions Associated with this Amendment

None applicable.

Title V Permit Amendment

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