

PERMIT NO. 3088-185-0073-V-07-0

ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit

Facility Name: Bathcraft, LLC
Facility Address: 1610 James P. Rogers Drive
Valdosta GA 31601, Lowndes County
Mailing Address: 435 Industrial Road
Savannah TN 38372
Parent/Holding Company: Bathcraft, LLC
Facility AIRS Number: 04-13-185-00073

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 Part 70 Permit for:

The operation of a fiberglass-reinforced bathtub manufacturing 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. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

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, for any misrepresentation made in Title V Application TV-44451 signed on March 3, 2017, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of 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 **45** pages.



Richard E. Dunn, Director
Environmental Protection Division

Table of Contents

PART 1.0	FACILITY DESCRIPTION.....	1
1.1	Site Determination	1
1.2	Previous and/or Other Names	1
1.3	Overall Facility Process Description	1
PART 2.0	REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY	2
2.1	Facility Wide Emission Caps and Operating Limits	2
2.2	Facility Wide Federal Rule Standards	2
2.3	Facility Wide SIP Rule Standards	2
2.4	Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit	2
PART 3.0	REQUIREMENTS FOR EMISSION UNITS	3
3.1	Emission Units	3
3.2	Equipment Emission Caps and Operating Limits	3
3.3	Equipment Federal Rule Standards	3
3.4	Equipment SIP Rule Standards	5
3.5	Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit	6
PART 4.0	REQUIREMENTS FOR TESTING	7
4.1	General Testing Requirements	7
4.2	Specific Testing Requirements	8
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection)	9
5.1	General Monitoring Requirements	9
5.2	Specific Monitoring Requirements	9
PART 6.0	RECORD KEEPING AND REPORTING REQUIREMENTS	10
6.1	General Record Keeping and Reporting Requirements	10
6.2	Specific Record Keeping and Reporting Requirements	13
PART 7.0	OTHER SPECIFIC REQUIREMENTS	25
7.1	Operational Flexibility	25
7.2	Off-Permit Changes	25
7.3	Alternative Requirements	26
7.4	Insignificant Activities	26
7.5	Temporary Sources	26
7.6	Short-term Activities	26
7.7	Compliance Schedule/Progress Reports	26
7.8	Emissions Trading	26
7.9	Acid Rain Requirements	26
7.10	Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)	26
7.11	Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)	28
7.12	Revocation of Existing Permits and Amendments	29
7.13	Pollution Prevention	29
7.14	Specific Conditions	29
PART 8.0	GENERAL PROVISIONS	30
8.1	Terms and References	30
8.2	EPA Authorities	30
8.3	Duty to Comply	30
8.4	Fee Assessment and Payment	31

Title V Permit

BathCraft, LLC

Permit No.: 3088-185-0073-V-07-0

8.5	Permit Renewal and Expiration	31
8.6	Transfer of Ownership or Operation.....	31
8.7	Property Rights	31
8.8	Submissions	32
8.9	Duty to Provide Information.....	32
8.10	Modifications	33
8.11	Permit Revision, Revocation, Reopening and Termination	33
8.12	Severability	34
8.13	Excess Emissions Due to an Emergency	34
8.14	Compliance Requirements	35
8.15	Circumvention	37
8.16	Permit Shield.....	37
8.17	Operational Practices	38
8.18	Visible Emissions	38
8.19	Fuel-burning Equipment	38
8.20	Sulfur Dioxide.....	39
8.21	Particulate Emissions.....	39
8.22	Fugitive Dust.....	39
8.23	Solvent Metal Cleaning	40
8.24	Incinerators	41
8.25	Volatile Organic Liquid Handling and Storage	41
8.26	Use of Any Credible Evidence or Information.....	42
8.27	Internal Combustion Engines.....	42
8.28	Boilers and Process Heaters.....	43
Attachments		45
A. List of Standard Abbreviations and List of Permit Specific Abbreviations		
B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups		
C. List of References		

PART 1.0 FACILITY DESCRIPTION**1.1 Site Determination**

The facility comprises one Title V site; there are no other facilities that could possibly be contiguous or adjacent and under common control.

1.2 Previous and/or Other Names

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

The facility was constructed in the 1970's by D&H Enterprises for the manufacture of fiberglass-reinforced plastic products. BathCraft, Inc. purchased the original company in 1986, which was subsequently purchased by Jacuzzi, Inc., and became New BathCraft, Inc. in 1998. The company name then changed to BathCraft, Inc.

BathCraft, Inc. was previously permitted for two operating groups, Operations Groups 1 (OG01) and 2 (OG02). Operations Group 2 (OG02) changed ownership and is now owned by Jacuzzi Whirlpool Bath. Jupiter Bathware, Inc. became the owner of BathCraft, Inc., which only operates Operations Group 1 (OG01). In 2014, BathCraft, Inc. was purchased by Bathcraft, LLC, and the name was changed to Bathcraft, LLC.

1.3 Overall Facility Process Description

Bathcraft, LLC manufactures gel coat surface bathtubs and acrylic surface bathtubs; both types are fiberglass reinforced, and 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 GC01, sprayed with barrier coat in BC01, and then laminated with chopped fiberglass and resin in lamination line LM01. Mold repair takes place in MR01. 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 lamination line LM02.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

- 2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, volatile organic compound (VOC) emissions in an amount equal to or exceeding 249 tons during any consecutive 12-month period.
[Avoidance of PSD – 40 CFR 52.21]

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.

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 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
GC01	Gel Coat #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63, Subpart WWWW	2.1.1, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 6.2.1 through 6.2.15	N/A	Filters
BC01	Barrier Coating	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63, Subpart WWWW	2.1.1, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 6.2.1 through 6.2.15	N/A	Filters
LM01	Resin Lamination of Gel Coat Units	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63, Subpart WWWW	2.1.1, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 6.2.1 through 6.2.15	N/A	Filters
LM02	Resin Lamination of Acrylic Units	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63, Subpart WWWW	2.1.1, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.1, 6.2.1 through 6.2.15	N/A	Filters
MR01	Mold Repair #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63, Subpart WWWW	2.1.1, 3.3.1 through 3.3.4, 3.4.1, 3.4.2, 5.2.1, 6.2.1 through 6.2.14	N/A	N/A

* 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

None Applicable.

3.3 Equipment Federal Rule Standards

- 3.3.1 The Permittee shall comply with all applicable provisions of the National Emission Standard for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63, Subpart A, "General Provisions," (as specified in Table 15 to 40 CFR 63 Subpart WWWW) and Subpart WWWW, "Reinforced Plastic Composites Production." [40 CFR 63.5785(a) and Table 15 to 40 CFR 63 Subpart WWWW]

3.3.2 The following operations at the facility are excluded from any requirements of 40 CFR 63 Subpart WWWW: 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 §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).
[40 CFR 63.5790(c)]

3.3.3 The Permittee shall cause all open molding operations to comply with the organic HAP emission limits specified in Table 3.3.3-1, using any compliance option allowed under Condition 6.2.5:
[40 CFR 63.5805(b) and Table 3 to 40 CFR 63 Subpart WWWW]

Table 3.3.3-1: Organic HAP Emission Limits

If the operation type is...	And the Permittee uses...	Organic HAP emission limit ¹
1. Open molding – corrosion – resistant and/or high strength (CR/HS)	a. Mechanical resin application	113 lb/ton
	b. Filament application	171 lb/ton
	c. Manual resin application.....	123 lb/ton
2. Open molding – non-CR/HS	a. Mechanical resin application	88 lb/ton
	b. Filament application	188 lb/ton
	c. Manual resin application.....	87 lb/ton
3. Open molding – tooling	a. Mechanical resin application	254 lb/ton
	b. Manual resin application.....	157 lb/ton
4. Open molding – low-flame spread/low smoke products	a. Mechanical resin application	497 lb/ton
	b. Filament application	270 lb/ton
	c. Manual resin application.....	238 lb/ton
5. Open molding – shrinkage-controlled resins ²	a. Mechanical resin application	354 lb/ton
	b. Filament application	215 lb/ton
	c. Manual resin application.....	180 lb/ton
6. Open molding – gelcoat ³	a. Tooling gel coating	440 lb/ton
	b. White/off white pigmented gel coating.....	267 lb/ton
	c. All other pigmented gel coating.....	377 lb/ton
	d. CR/HS or high performance gel coat.....	605 lb/ton
	e. Fire retardant gel coat	854 lb/ton
	f. Clear production gel coat	522 lb/ton

¹ Organic HAP emission limits for open molding are expressed as pounds of HAP per ton of resin or gel coat applied. Emissions must be at or below these values based on a 12-month rolling average.

² This emission limit applies regardless of whether the shrinkage-controlled resin is used as a production resin or a tooling resin.

³ If the Permittee only applies gel coat with manual application, for compliance purposes treat the gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If the Permittee uses multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, the nonatomized spray gel coat equation may be used to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

- 3.3.4 The Permittee shall comply with the work practice standards specified below in Table 3.3.4-1:
[40 CFR 63.5805(b) and Table 4 to 40 CFR 63 Subpart WWW]

Table 3.3.4-1: Work Practice Standards

For...	The Permittee shall...
1. A new or existing cleaning operation	a. Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP-containing cleaners may be used to clean cured resin from application equipment. "Application equipment" includes any equipment that directly contacts resin.
2. A new or existing HAP-containing materials storage operation	a. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
3. All mixing operations ¹	a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
	b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
	c. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessel.

¹ Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

3.4 Equipment SIP Rule Standards

- 3.4.1 The Permittee shall not cause, let, permit, suffer, or allow emissions, from any air contaminant source, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)(1)]
- 3.4.2 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission of particulate matter from any source, in total quantities, to equal or exceed the allowable rate calculated using the following equation:
[391-3-1-.02(2)(e)(1)(i)]

$$E = 4.1 * P^{0.67}$$

Where:

E = the allowable particulate matter emission rate in pounds per hour; and

P = the process input weight rate in tons per hour.

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

- 3.5.1 The Permittee shall ensure that the particulate emissions from the gel coat and resin operations (Emission Unit ID Nos. GC01, BC01, LM01 and LM02) are controlled by filters. These filters shall be operated and maintained per manufacturer's specifications. The Permittee shall perform filter changes for each gel coat and resin operation at least once per week of operation.
[391-3-1-.02(a)(10)]

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR 63) 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.
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance 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. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
- a. Method 1 or 1A for sample point locations
 - b. Method 2, 2A, 2C, 2D, 2F, or 2G for determination of volumetric flow rate
 - c. Method 3 for determination of stack gas molecular weight
 - d. Method 4 for determination of stack gas moisture
 - e. Method 5 for determination of particulate matter emissions
 - f. Method 9 and Section 1.3 of the above-referenced document for the determination of the opacity of visible emissions
 - g. Method 18 for determination of organic HAP emissions
 - h. Method 25 for determination of total gaseous nonmethane organic emissions as carbon
 - i. Method 25A for the determination of total gaseous organic concentration using a flame ionization analyzer
 - j. Method 204 for the criteria for and verification of a permanent or temporary total enclosure
 - k. Method 311 for the analysis of hazardous air pollutant compounds in paints and coatings by direct injection into a gas chromatograph

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

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 Requirements

- 5.2.1 The Permittee shall perform an inspection at least once per week of operations to verify that all containers associated with gel coat, resin lamination, and surface coating operations (Emission Unit ID Nos. GC01, BC01, LM01, LM02, and MR01) containing VOC and/or 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]

PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

- 6.1.1 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 to the EPA. The records shall be retained for at least five (5) years following the date of entry.

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

- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

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

- 6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

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

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

6.1.5 Where applicable, the Permittee shall keep the following records:
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(iii), and 40 CFR 63.5805(b)]
- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - i. None required to be reported in accordance with Condition 6.1.4.
 - b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any consecutive 12-month period during which total VOC emissions from the entire facility exceed 249 tons.
 - ii. Any consecutive 12-month period during which the organic HAP emissions from the activities specified in Table 3.3.3-1 exceed the limits presented in the table.
 - c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Any failure to follow the work practice standards regarding cleaning operations, HAP-containing materials storage, and mixing operations found in Condition 3.3.4.
 - ii. Failure to follow the gel coat and resin operation filter replacement schedule in Condition 3.5.1 for any gel coat or resin operation.
 - d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
 - i. Any failure to perform the weekly container inspections required by Condition 5.2.1.
 - ii. Any calendar month in which VOC emissions from the entire facility exceed 20.8 tons.

6.2 Specific Record Keeping and Reporting Requirements

Avoidance of PSD (40 CFR Part 52.21)

6.2.1 The Permittee shall maintain monthly usage records of all materials used at the facility that contain VOC. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the volatile content of any material disposed as waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.2 The Permittee shall use the monthly usage records required in Condition 6.2.1 to calculate the total monthly VOC emissions from the facility. The Permittee shall use the procedures specified in 40 CFR 63 Subpart WWWW or Appendix H of the Georgia Department of Natural Resources **Procedures for Testing and Monitoring Sources of Air Pollutants** to calculate VOC emissions from the facility's gel coat and resin operations. All calculations should be kept as part of the monthly 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. $\text{VOC (lbs)} = \text{Material used (lbs)} * (\% \text{ weight VOC}); \text{ or}$

b. $\text{VOC (lbs)} = \text{Material used (gallons)} * (\text{VOC Content, lbs/gallon})$

The Permittee shall notify the Division in writing if VOC emissions from the facility exceed 20.8 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 limits in Condition 2.1.1.

6.2.3 The Permittee shall use the calculations required by Condition 6.2.2 to determine the 12-month rolling total VOC emissions from the facility for each month. All calculations should be kept as part of the monthly record. The Permittee shall notify the Division in writing if VOC emissions from the facility exceed 249 tons during any twelve consecutive 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 attain compliance with the emission limits in Condition 2.1.1.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(i)]

40 CFR 63 Subpart WWWW Requirements

6.2.4 For any emission calculations required in Conditions 6.2.5 through 6.2.10, the Permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in paragraphs (a) through (c) of this condition, as applicable, to determine the organic HAP content of resins and gel coats.
[40 CFR 63.5797]

- a. The Permittee shall include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.
- b. If the organic HAP content is provided by the material supplier or manufacturer as a range, the Permittee shall use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, the Permittee shall use the measured organic HAP content to determine compliance.
- c. If the organic HAP content is provided as a single value, the Permittee may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the Permittee shall use the measured organic HAP content to determine compliance.

6.2.5 The Permittee shall use one of the following methods in paragraphs (a) through (d) of this Condition to meet the standards for open molding operations in Table 3.3.3-1. The Permittee may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of the emissions to an add-on control device. The Permittee may use different compliance options for the different operations listed in Table 3.3.3-1. The necessary calculations must be completed within 30 days after the end of each month. The Permittee may switch between the compliance options in paragraphs (a) through (d) of this Condition. When changing options based on a 12-month rolling average, the Permittee shall base the average on the previous 12 months of data calculated using the compliance option that the Permittee is changing to, unless the compliance option previously used did not require maintaining resin and gel coat usage records. In this case, the Permittee shall immediately begin collecting resin and gel coat usage data and demonstrate compliance 12 months after changing compliance options.

[40 CFR 63.5810, Table 1 and Table 7 to 40 CFR 63 Subpart WWWW]

- a. *Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3.3.3-1. (Compliant Material Option)*
- i. Calculate the actual organic HAP emission factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operation types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The Permittee shall calculate the organic HAP emission factors for each different process stream by using the appropriate equations in Table 6.2.5-1 of this Condition for open molding, or site-specific emissions factors discussed in 40 CFR 63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on control devices. If the Permittee is using vapor suppressants to reduce HAP emissions, a determination of the vapor suppressant effectiveness (VSE) shall be made by conducting testing according to the procedures specified in Appendix A to Subpart WWW of Part 63. If the Permittee is using an add-on control device to reduce HAP emissions, the add-on control factor shall be determined by conducting capture and control efficiency testing using the procedures specified in 40 CFR 63.5850. The organic HAP emission factor calculated from the equations in Table 6.2.5-1 of this Condition, or a site-specific emission factor, is multiplied by the add-on control factor to calculate the organic HAP emission factor after controls. Use Equation 1 to calculate the add-on control factor used in the organic HAP emission factor equations.

$$\text{Add-on Control Factor} = 1 - \frac{\% \text{ Control Efficiency}}{100} \quad (\text{Equation 1})$$

Where,

% Control Efficiency = a value calculated from organic HAP emission test measurements made according to the requirements of 40 CFR 63.5850

- ii. If the calculated emission factor is less than or equal to the appropriate emission limit, compliance with the emission limit of Table 3.3.3-1 has been demonstrated. It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat used, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this Condition, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

Table 6.2.5-1:**Equations to Calculate Organic HAP Emission Factors for Specific Open Molding Process Streams¹**

If the operation type is a new or existing	And the application technique is	With	Use this organic HAP Emission Factor (EF) Equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat) ^{2,3,4}	Use this organic HAP Emission Factor (EF) Equation for materials with 33% or more organic HAP (19% for nonatomized gel coat) ^{2,3,4}
1. Open molding operation	a. Manual resin application	i. Nonvapor-suppressed resin.....	$EF = 0.126 \times \%HAP \times 2000$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000$
		ii. Vapor-suppressed resin.....	$EF = 0.126 \times \%HAP \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times (1 - (0.5 \times VSE \text{ factor}))$
		iii. Vacuum bagging/closed-mold curing with roll-out	$EF = 0.126 \times \%HAP \times 2000 \times 0.8$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.8$
		iv. Vacuum bagging/closed-mold curing without roll-out..	$EF = 0.126 \times \%HAP \times 2000 \times 0.5$	$EF = ((0.286 \times \%HAP) - 0.0529) \times 2000 \times 0.5$
	b. Atomized mechanical resin application	i. Nonvapor-suppressed resin....	$EF = 0.169 \times \%HAP \times 2000$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000$
		ii. Vapor-suppressed resin.....	$EF = 0.169 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
		iii. Vacuum bagging/closed-mold curing with roll-out	$EF = 0.169 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.85$
		iv. Vacuum bagging/closed-mold curing without roll-out..	$EF = 0.169 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.714 \times \%HAP) - 0.18) \times 2000 \times 0.55$
	c. Nonatomized mechanical resin application	i. Nonvapor-suppressed resin....	$EF = 0.107 \times \%HAP \times 2000$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000$
		ii. Vapor-suppressed resin.....	$EF = 0.107 \times \%HAP \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times (1 - (0.45 \times VSE \text{ factor}))$
		iii. Vacuum bagging/closed-mold curing with roll-out	$EF = 0.107 \times \%HAP \times 2000 \times 0.85$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.85$
		iv. Vacuum bagging/closed-mold curing without roll-out..	$EF = 0.107 \times \%HAP \times 2000 \times 0.55$	$EF = ((0.157 \times \%HAP) - 0.0165) \times 2000 \times 0.55$
	d. Atomized mechanical resin application with robotic or automated spray control ⁵	i. Nonvapor-suppressed resin....	$EF = 0.169 \times \%HAP \times 2000 \times 0.77$	$EF = 0.77 \times ((0.714 \times \%HAP) - 0.18) \times 2000$
	e. Filament application ⁶	i. Nonvapor-suppressed resin....	$EF = 0.184 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000$
		ii. Vapor-suppressed resin.....	$EF = 0.12 \times \%HAP \times 2000$	$EF = ((0.2746 \times \%HAP) - 0.0298) \times 2000 \times 0.65$
	f. Atomized spray gel coat application	i. Nonvapor-suppressed gel coat.....	$EF = 0.445 \times \%HAP \times 2000$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000$
	g. Nonatomized spray gel coat application	i. Nonvapor-suppressed gel coat.....	$EF = 0.185 \times \%HAP \times 2000$	$EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$

Title V Permit

BathCraft, LLC

Permit No.: 3088-185-0073-V-07-0

If the operation type is a new or existing	And the application technique is	With	Use this organic HAP Emission Factor (EF) Equation for materials with less than 33% organic HAP (19% organic HAP for nonatomized gel coat) ^{2,3,4}	Use this organic HAP Emission Factor (EF) Equation for materials with 33% or more organic HAP (19% for nonatomized gel coat) ^{2,3,4}
	h. Atomized spray gel coat application using robotic or automated spray	i. Nonvapor-suppressed gel coat.....	$EF = 0.445 \times \%HAP \times 2000 \times 0.73$	$EF = ((1.03646 \times \%HAP) - 0.195) \times 2000 \times 0.73$

¹ The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in Table 3.3.3-1. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

² To obtain the organic HAP emission factor value for an operation with add-on control device, multiply the EF above by the add-on control factor calculated using Equation 1 of Condition 6.2.5. The organic HAP emission factors have units of lbs of organic HAP per ton of resin or gel coat applied.

³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

⁴ The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of Appendix A in 40 CFR 63 Subpart WWWW.

⁵ This equation is based on an organic HAP emission factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emission factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

⁶ Applies only to filament application using an open resin batch. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emission factor equation.

- b. *Demonstrate that, on average, the individual organic HAP emission limits for each combination of operation type and resin application method or gel coat type is being met.*

The Permittee shall demonstrate that, on average, the individual organic HAP emission limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3.3.3-1, as applicable, is being met.

- i. Group the process streams described in paragraph (a) of this Condition by operation type and resin application method or gel coat type listed in Table 3.3.3-1 and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emission factor calculated in paragraph (a)(i) of this Condition and the amount of neat resin plus or neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus or neat gel coat plus used in that operation type as shown in Equation 2.

$$AEF = \frac{\sum_{i=1}^n (APSEF_i \times Material_i)}{\sum_{i=1}^n Material_i} \quad (\text{Equation 2})$$

Where,

- AEF = Average organic HAP Emission Factor, lbs/ton;
 APSEF_i = Actual Process Stream EF_i, actual organic HAP emission factor for process stream **i**, lbs/ton;
 Material_i = Neat resin plus or neat gel coat plus used during the last 12 months for process stream **i**, tons;
 n = Number of process streams where an organic HAP emission factor was calculated

The Permittee may, but is not required to, include process streams where compliance is demonstrated as described in paragraph (a) of this Condition, subject to the limitations described in paragraph (a)(ii) of this Condition. The Permittee is not required to and should not include process streams for which compliance will be demonstrated using the procedures in paragraph (d) of this Condition.

- ii. Compare each organic HAP emission factor calculated in paragraph (b)(i) of this Condition with its corresponding organic HAP emission limit in Table 3.3.3-1. If all emission factors are equal to or less than their corresponding emission limits, then compliance has been demonstrated.

c. *Demonstrate compliance with a weighted average emission limit.*

The Permittee shall demonstrate each month that each weighted average of the organic HAP emission limits in Table 3.3.3-1, as applicable, is being met. When using this option, the Permittee shall demonstrate compliance with the weighted average organic HAP emission limit for all open molding operations.

- i. Each month calculate the weighted average organic HAP emission limit for all open molding operations for the last 12-month period to determine the organic HAP emission limit that must be met. To do this, multiply the individual organic HAP emission limits in Table 3.3.3-1 for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations over the last 12 months as shown in Equation 3.

$$WAE L = \frac{\sum_{i=1}^n (EL_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Equation 3})$$

Where,

WAE L = Weighted Average Emission Limit, lbs/ton;

EL_i = Organic HAP Emission Limit for operation type **i** from Table 3.3.3-1, lbs/ton;

Material_i = Neat resin plus and/or neat gel coat plus used during the last 12-month period for operation type **i**, tons;

n = Number of operations

- ii. Each month calculate the weighted average organic HAP emission factor for open molding. To do this, multiply the actual open molding operation organic HAP emission factors calculated in paragraph (b)(i) of this Condition and the amount of neat resin plus or neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4.

$$AWAE F = \frac{\sum_{i=1}^n (AEF_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Equation 4})$$

Where,

AWAE F = Actual Weighted Average organic HAP Emission Factor, lbs/ton;

AEF_i = Actual organic HAP Emission Factor for operation type **i**, lbs/ton;

Material_i = Neat resin plus and/or neat gel coat plus used during the last 12 calendar months for operation type **i**, tons;

n = Number of operations

- iii. Compare the values calculated in paragraphs (c)(i) and (ii) of this Condition. If each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding 12-month rolling average organic HAP emission limit, then compliance has been demonstrated.
- d. *Meet the organic HAP emission limit for one application method and use the same resin(s) for all application methods of that resin type.*

This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

- i. For any combination of manual resin application, mechanical resin application, or filament application, the Permittee may elect to meet the organic HAP emission limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph. Table 6.2.5-2 of this Condition presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 6.2.5-2, the resin is in compliance.

Table 6.2.5-2:

Options Allowing Use of the Same Resin

Across Different Operations That Use the Same Resin Type

If the facility has the following resin type and application method...	The highest resin weight percent organic HAP content, or weighted average weight percent organic HAP content, that can be used for...	Is...
CR/HS resins, nonatomized mechanical	i. CR/HS filament application..... ii. CR/HS manual.....	46.4 46.4
CR/HS resins, filament application	i. CR/HS manual.....	42.0
Non-CR/HS resins, filament application	i. Non-CR/HS mechanical ¹ ii. Non-CR/HS manual.....	45.0 45.0
Non-CR/HS resins, nonatomized mechanical	i. Non-CR/HS manual.....	38.5
Tooling resins, nonatomized mechanical	i. Tooling manual.....	91.4
Tooling resins, manual	i. Tooling atomized mechanical.....	45.9

¹ Nonatomized mechanical application must be used.

- ii. The Permittee may also use a weighted average organic HAP content for each application method described in paragraph (d)(i) of this Condition. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(i) of this Condition except substitute organic HAP content for organic HAP emission factor. Compliance is demonstrated if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 6.2.5-2 of this Condition.

- iii. The Permittee may simultaneously use the averaging provisions in paragraph (b) or (c) of this Condition to demonstrate compliance for any operations and/or resins not included in compliance demonstrations prescribed by paragraphs (d)(i) and (d)(ii) of this Condition. However, any resins for which compliance is claimed under the option in paragraphs (d)(i) and (d)(ii) of this Condition may not be included in any of the averaging calculations described in paragraph (b) or (c) of this Condition.
 - iv. The Permittee does not have to keep records of resin use for any of the individual resins where compliance is demonstrated under the option in paragraph (d)(i) of this Condition unless including that resin in the averaging calculations described in paragraph (d)(ii) of this Condition.
- e. For purposes of this condition the following definitions apply to the terms specified herein:
 - i. “Neat gel coat plus” is defined as neat gel coat (gel coat as purchased from the supplier, but not including any inert fillers) plus any organic HAP-containing materials that are added to the gel coat by the supplier or the facility, excluding catalysts and promoters. Neat gel coat plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters
 - ii. “Neat resin plus” is defined as neat resin (resin as purchased from the supplier, but not including any inert fillers) plus any organic HAP-containing materials that are added to the resin by the supplier or the facility. Neat resin plus does not include any added filler, reinforcements, catalysts, or promoters. Neat resin plus does include any additions of styrene or methyl methacrylate monomer in any form, including in catalysts and promoters.
 - iii. “Operation” is defined as a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.
 - iv. “Process Stream” is defined as each individual combination of resin or gel coat, application technique, and control technique.

- 6.2.6 The Permittee shall demonstrate continuous compliance with each applicable standard in Condition 3.3.3 by maintaining an organic HAP emission factor value less than or equal to the appropriate organic HAP emission limit listed in Table 3.3.3-1, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emission limits, as described in Condition 6.2.10.
[40 CFR 63.5835 and §63.5900(a)(2)]

- 6.2.7 The Permittee shall demonstrate continuous compliance with organic HAP content limits in Table 6.2.5-2, if applicable, by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 6.2.5-2 on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 6.2.5-2, as discussed in Condition 6.2.10.
[40 CFR 63.5835 and §63.5900(a)(3)]
- 6.2.8 The Permittee shall demonstrate continuous compliance with the work practice standards in Condition 3.3.4 by performing the work practice required for the described operation and adhering to the notification requirements of Condition 6.2.11.
[40 CFR 63.5835 and §63.5900(a)(4) and §63.5900(b)]
- 6.2.9 The Permittee shall collect and maintain records of resin and gel coat usage, organic HAP content, and the type of operation where the resin or gel coat is used if the Permittee is meeting any organic HAP emission limits based on an organic HAP emission limit in Table 3.3.3-1. The Permittee shall collect and maintain records of resin and gel coat usage, organic HAP content, and the type of operation where the resin or gel coat is used if the Permittee is meeting any organic HAP content limits in Table 6.2.5-2 by averaging organic HAP contents. Resin and gel coat usage records may be based on purchase records if the Permittee can reasonably estimate in which type of operation the resin and gel coat is applied. The organic HAP content records may be based on MSDS or on resin or gel coat specifications supplied by the supplier.
[40 CFR 63.5895(c)]
- 6.2.10 The Permittee is not required to collect and maintain resin and gel coat usage records for the individual resins and gel coats that are demonstrated, as applied, to meet the applicable organic HAP emission limit as defined in Condition 6.2.5(a). However, the Permittee shall retain records of resin and gel coat organic HAP content, and include a list of these resins and gel coats and identify their application methods in each compliance report. The Permittee shall demonstrate again that an individual resin or gel coat meets its emission limit as specified in Condition 6.2.5(a) if, after demonstrating that a specific combination of the individual resin or gel coat, application method, and controls meets its applicable emission limit, the resin or gel coat changes or the organic HAP content increases, or the application method or controls change. If any of the previously mentioned changes result in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3.3.3-1, the Permittee shall immediately begin collecting resin and gel coat usage records and calculate compliance using one of the averaging options on a 12-month rolling average.
[40 CFR 63.5895(d)]

- 6.2.11 The Permittee shall submit the following notifications and reports to the Division, in writing.
[40 CFR 63.5910(a) through (d), (g), (i), Table 14 of 40 CFR 63 Subpart WWWW]
- a. The Permittee shall submit a compliance report semiannually, as specified in Condition 6.1.4, that contains the following:
 - i. A statement that there were no deviations during that reporting period, if there were no deviations from any emission limitations that apply and there were no deviations from the requirements for work practice standards in Table 3.3.4-1 that apply.
 - ii. The total operating time of each affected source during the reporting period and information on the number, duration, and cause of deviations along with the corrective action taken, if there were deviations from any emission limitation or work practice standard during the reporting period.
 - b. The Permittee shall include the following in each compliance report:
 - i. Company name and address,
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report,
 - iii. Date of the report and the beginning and ending dates of the reporting period,
 - iv. In the event of a startup, shutdown, or malfunction during the reporting period where the actions taken were consistent with those specified in the facility's startup, shutdown, and malfunction plan, the report shall include information specified in 40 CFR 63.10(d)(5)(i).
 - v. In the event that there were no deviations from any organic HAP emission limitation, as described in Condition 6.2.5, and there were no deviations from the requirements of the work practice standards described in Condition 3.3.4, the Permittee shall submit a statement that there were no deviations from the organic HAP emission limitations or work practice standards during the reporting period.
 - c. The Permittee shall submit with the compliance report required by this Condition, for each deviation from an organic HAP emission limitation and/or each deviation from the requirements for work practice standards that occur at the facility, a notification containing the following:
 - i. The total operating time of each affected source during the reporting period; and
 - ii. Information on the number, duration, and cause of deviations, and the corrective action taken.

- d. The Permittee shall submit to the Division any deviations from 40 CFR 63 Subpart WWW along with the semiannual monitoring report required in Condition 6.1.4.
 - e. The Permittee shall state in the compliance report if the compliance options have changed since the last compliance report.
- 6.2.12 If the Permittee changes any information submitted in any notification, then the Permittee shall submit the changes in writing to the Division within 15 calendar days after the change. [40 CFR 63.5905(b) and §63.9(j)]
- 6.2.13 The Permittee shall maintain the following written records at the facility, available for inspection or submittal to the Division:
[40 CFR 63.10(b)(2)(xiv); 63.5915(a)(1), (c), and (d)]
- a. A copy of each notification and report submitted to comply with 40 CFR 63 Subpart WWW, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b. All data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Tables 3.3.3-1 and 6.2.5-2.
 - c. A certified statement that the Permittee is in compliance with applicable work practice requirements identified in Condition 3.3.4.
- 6.2.14 The Permittee shall maintain all records related to compliance with 40 CFR 63 Subpart WWW such that they may be readily accessible and suitable for inspection by the Division. Each record must be kept for a period of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record should be kept onsite for at least two (2) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept in hard copy form or in a computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.
[40 CFR 63.10(b)1 and §63.5920(a) through (d)]

Other Record Keeping and Reporting Requirements

- 6.2.15 The Permittee shall maintain a log indicating the date and time that each gel coat or resin operation filter is changed, and the initials of the person(s) changing each filter. The log shall be kept as part of the monthly record and shall be available for inspection or submittal to the Division for five (5) years from the date of record. Any failure to perform filter replacements as prescribed in Condition 3.5.1 shall be reported in accordance with Condition 6.1.7 and shall be indicated in the log.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(i)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.1 Operational Flexibility**

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.
[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

7.2 Off-Permit Changes

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:
[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act.
[Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

7.3 Alternative Requirements

[White Paper #2]

Not Applicable.

7.4 Insignificant Activities

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

7.5 Temporary Sources

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

Not Applicable.

7.6 Short-term Activities

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

Not Applicable.

7.7 Compliance Schedule/Progress Reports

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

None Applicable.

7.8 Emissions Trading

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

Not Applicable.

7.9 Acid Rain Requirements

Not Applicable.

7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.

- a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.

Title V Permit

- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
 - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.
 - ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
 - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
 - iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP*eSubmit (information for establishing an account can be found at www.epa.gov/emergencies/content/rmp/rmp_esubmit.htm). Electronic Signature Agreements should be mailed to:

MAIL

Risk Management Program (RMP) Reporting Center
P.O. Box 10162
Fairfax, VA 22038

COURIER & FEDEX

Risk Management Program (RMP) Reporting Center
CGI Federal
12601 Fair Lakes Circle
Fairfax, VA 22033

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.
[Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
3088-185-0073-V-06-0	August 11, 2014

7.13 Pollution Prevention

None applicable.

7.14 Specific Conditions

None applicable.

PART 8.0 GENERAL PROVISIONS**8.1 Terms and References**

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence.
[391-3-1-.02(2)(a)2]

8.2 EPA Authorities

- 8.2.1 Except as identified as “State-only enforceable” requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.
[40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, “Inspections, Monitoring, and Entry.”
[40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, “Emergency Powers.”
[40 CFR 70.6(f)(3)(i)]

8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

- 8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.
[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

8.4 Fee Assessment and Payment

- 8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”
[391-3-1-.03(9)]

8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.
[391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.
[391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation.
[391-3-1-.03(10)(e)3(iii)]

8.6 Transfer of Ownership or Operation

- 8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.
[391-3-1-.03(4)]

8.7 Property Rights

- 8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

8.8 Submissions

- 8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

**Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
Atlanta Tradeport, Suite 120
4244 International Parkway
Atlanta, Georgia 30354-3908**

- 8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

**Air and EPCRA Enforcement Branch – U. S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104**

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]
- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.
[391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

8.10 Modifications

- 8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The 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. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.
[391-3-1-.03(1) through (8)]

8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:
[391-3-1-.03(10)(d)1(i)]
- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;
[391-3-1-.03(10)(e)6(i)(I)]
 - b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;
[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
 - c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or
[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
 - d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.
[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.
[391-3-1-.03(10)(e)6(ii)]

- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.
[391-3-1-.03(10)(e)6(iii)]
- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]
- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

8.12 Severability

- 8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

8.13 Excess Emissions Due to an Emergency

- 8.13.1 An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:
- a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. The Permitted facility was at the time of the emergency being properly operated;

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
 - d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

8.14 Compliance Requirements

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

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

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

- e. Any additional requirements specified by the Division.

8.14.2 Inspection and Entry

- a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:
[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]
 - i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
 - iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.
[391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that:
[391-3-1-.02(2)(a)7(i)]
 - i. The best operational practices to minimize emissions are adhered to;
 - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
 - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.
[391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) – New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.
[391-3-1-.02(2)(a)7(iii)]

8.15 Circumvention

State Only Enforceable Condition.

- 8.15.1 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 which is based on the concentration of the pollutants in the gases discharged into the atmosphere.
[391-3-1-.03(2)(c)]

8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.
[391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as “State only enforceable” does not have a Permit shield.

8.17 Operational Practices

- 8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the 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 any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.
[391-3-1-.02(2)(a)10]

State Only Enforceable Condition.

- 8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.
[391-3-1-.02(2)(a)1]

8.18 Visible Emissions

- 8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1]

8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input.
[391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.
[391-3-1-.02(2)(d)]

- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
[391-3-1-.02(2)(d)]

8.20 Sulfur Dioxide

- 8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.
[391-3-1-.02(2)(g)]

8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.
[391-3-1-.02(2)(e)]

- a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

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

- b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and
P = process input weight rate in tons per hour.

8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
- 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 dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

8.23 Solvent Metal Cleaning

8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied: [391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
 - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
 - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
 - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:
[391-3-1-.02(2)(c)1-4]
- a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
 - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
- a. It is a multiple chamber incinerator;
 - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
 - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

8.25 Volatile Organic Liquid Handling and Storage

- 8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.
[391-3-1-.02(2)(vv)(1)]

8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[391-3-1-.02(3)(a)]

8.27 Internal Combustion Engines

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, 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 IIII - "Standard of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:
[40 CFR 60.4200]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
 - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
 - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
 - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
 - e. Maintain any records in accordance with Subpart IIII
 - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 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) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.
[40 CFR 60.4230]

- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for ≤500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to:

[40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

8.28 Boilers and Process Heaters

- 8.28.1 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart A – "General Provisions" and 40 CFR 63 Subpart JJJJJ – "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."
[40 CFR 63.11193]

- 8.28.2 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart A – "General Provisions" and 40 CFR 63 Subpart DDDDD – “ National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.” [40 CFR 63.7480]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

List Of Standard Abbreviations

[illegible]

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	1
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm)7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	4
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	10
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

Title V Permit

BathCraft, LLC

Permit No.: 3088-185-0073-V-07-0

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	1
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	1
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	95
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	5
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

Title V Permit

BathCraft, LLC

Permit No.: 3088-185-0073-V-07-0

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	1
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	150
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	5

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Plastic fitting attachment to tub area	3
Product repair and touchup	6
Two part foam application	1

ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) is not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Trimming, cutting, grinding, and sanding of gel coat and acrylic units as required. These operations are controlled by one large baghouse and 15 - 20 additional small baghouses. All baghouses vent inside the building.	10	X	X	

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) is not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

ATTACHMENT C**LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/software/tanks/index.html.
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).