

PERMIT AMENDMENT NO. 2431-121-0853-S-02-1
ISSUANCE DATE:



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality – Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 2431-121-0853-S-02-0 issued on December 18, 2018 to:

Facility Name: American Building Supply, Inc.
Facility Address: 4475 South Fulton Parkway, Bldg. 6
Union City, Georgia 30291 (Fulton County)
Mailing Address: 3250 Lakeport Blvd.
Klamath Falls, OR 97601
Facility AIRS Number: 04-13-121-00853

for the following: Operation of a wooden door manufacturing facility

is hereby amended as follows: Construction and operation of additional manufacturing equipment and a foam injection line.

Reason for Amendment: Application No. 27220 dated September 3, 2019

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 3 page(s).

This Permit Amendment is hereby made a part of Permit No. 2431-121-0853-S-02-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.



Richard E. Dunn, Director
Environmental Protection Division

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2. Allowable Emissions

MODIFIED CONDITION

- 2.1 The Permittee shall not discharge nor cause the discharge into the atmosphere from the entire facility volatile organic compound (VOC) emissions in an amount equal to or exceeding 70 tons during any consecutive twelve-month period.
[RACT Analysis and 40 CFR 51.165]

NEW CONDITION

- 2.6 The Permittee shall limit the average VOC content of the adhesives and glues to no greater than 0.5% by weight, as applied, during any consecutive twelve-month period.
[391-3-1-.02(2)(tt) - RACT]

NEW CONDITION

- 2.7 The Permittee shall limit the average VOC content of the coatings (non-adhesives/non-glue) and cleaners to 0.3 pounds per gallon, as applied, during any consecutive twelve-month period.
[391-3-1-.02(2)(tt) - RACT]

NEW CONDITION

- 2.8 The Permittee shall not cause, let, permit, suffer, or allow the VOC emissions from the door foam application to exceed 0.3 lbs per 100 lbs of foam material (Part A, Part B and Blowing Agent) processed.
[391-3-1-.02(2)(tt) - RACT]

3. Fugitive Emissions

NEW CONDITION

- 3.2 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions, and shall store all VOC-laden cleaning materials – including shop towels, rags and mop heads – in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition.
[391-3-1-.02(2)(a)10]

6. Performance Testing

NEW CONDITION

- 6.2 Within 60 days after the startup of the door foam operations and every thirty-six months thereafter, the Permittee shall conduct a weight test to determine the VOC emissions from the door foam operations. The test shall be conducted on the largest sized door produced at the facility. The test shall determine the initial door weight (the unfilled door plus the foam material added to the door). The scale shall be accurate to ± 1 gram. After 15 days of storage in the warehouse, the final filled door weight shall be determined. The Foam VOC emission factor (VF) (lbs VOC/100 lbs of foam material) shall be calculated using the following equation.

$$VF = ((\text{Initial Door Weight} - \text{Final Filled Door Weight}) / \text{Foam Material Weight}) * 100$$

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7. Notification, Reporting and Record Keeping Requirements

MODIFIED CONDITION

- 7.1 The Permittee shall use the monthly usage records to calculate the total monthly VOC emissions from the entire facility. All calculations should be kept as part of the monthly record. The Permittee shall notify the Division in writing if VOC emissions from the entire facility exceed 5.8 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. The Permittee shall use the following equation to calculate VOC emissions.

$$\text{VOC} = (\sum_{i=1}^n (A_i * VA_i) + \sum_{i=1}^n (C_i * VC_i) + (F * 0.003))/2000$$

Where:

- VOC = Amount of VOC emitted (tons per month)
A_i = Monthly amount of adhesive usage in pounds
VA_i = VOC content of adhesive/glue (weight percent)
C_i = Monthly amount of coating usage in gallons
VC_i = VOC content of coatings/cleaners (pounds of VOC/gallon of coating and cleaners)
F = Monthly amount of foam usage (Part A, Part B and Blowing Agent) in pounds

MODIFIED CONDITION

- 7.2 The Permittee shall use the calculations required by Condition 7.1 to determine the 12-month rolling total VOC emissions from the entire 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 entire facility equal or exceed 70 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 limit in Condition 2.1.

NEW CONDITION

- 7.5 The Permittee shall maintain records of the VOC content (percent by weight) of the adhesives and glues, as applied. The Permittee shall use the calculations required by Condition 7.1 to determine the 12-month rolling total average VOC content of the adhesives and glues for each month. All calculations should be kept as part of the monthly record. The Permittee shall notify the Division in writing if average VOC content of the adhesives and glues exceed 0.5% by weight as applied 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 limit in Condition 2.6.

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NEW CONDITION

- 7.6 The Permittee shall maintain records of the VOC content (pounds per gallon) of all coatings (non-adhesives/non-glue) and cleaners, as applied. The Permittee shall use the calculations required by Condition 7.1 to determine the 12-month rolling total the average VOC content of the coatings (non-adhesives/non-glue) and cleaners for each month. All calculations should be kept as part of the monthly record. The Permittee shall notify the Division in writing if average VOC content of the coatings (non-adhesives/non-glue) and cleaners exceed 0.3 pounds per gallon as applied 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 limit in Condition 2.7.