Air Quality Permit

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

Facility Name:   Steves & Sons, Inc.
Facility Address: 1715 Industrial Drive  
                  Sycamore, Georgia 31714 (Turner County)
Mailing Address: 203 Humble Avenue  
                  San Antonio, Texas 78225

Facility AIRS Number: 04-13-287-00035

is issued a Permit for the following:

Construction and operation of a facility for the manufacture of wooden doors. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

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

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28223 dated December 10, 2021; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.

DRAFT

Richard E. Dunn, Director
Environmental Protection Division
1. General Requirements

1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.

1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.

1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.

1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.

1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire facility, volatile organic compounds (VOC) in amounts equal to or exceeding 99 tons during any twelve consecutive month period.

[Title V Avoidance for VOC]
2.2 The Permittee shall operate the control devices at all times while the associated emission units are in operation.
[Title V Avoidance for PM]

2.3 The Permittee shall not cause, let, suffer, permit, or allow any emissions from any manufacturing process, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

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

a. \( E = 4.1P^{0.67} \), for process input weight rate up to and including 30 tons per hour;
b. \( E = 55P^{0.11} - 40 \), for process input weight rate in excess of 30 tons per hour.

Where:

\( E = \) allowable emission rate in pounds per hour;
\( P = \) process for fuel burning equipment less than 10 MMBtu/hr. input weight rate in tons per hour.

2.5 The Permittee shall not fire any fuel other than natural gas in the paint booth heaters (ID Nos. PBH1 and PBH2).
[391-3-1-.03(2)(c) and 391-3-1-.02(g)2. (subsumed)]

3. **Fugitive Emissions**

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

a. Use, where possible, of water or chemicals for control of dust from all sources at the facility that is subject to this regulation including but limited to: the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and

e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.

4.2 The Permittee shall maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones.

4.3 The Permittee shall perform filter changes for the spray booths (ID Nos. PB1 and PB2) within 24 hours of whenever the static pressure drop across the filter systems falls outside the manufacturers recommended value.

5. Monitoring

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

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

a. A differential pressure indicator to measure the pressure drop across Baghouses BH1 and BH2. The pressure drop shall be monitored and data recorded for each week of operation.

b. A differential pressure indicator to measure the pressure drop across each paint booth filter. The pressure drop shall be monitored and data recorded for each week of operation.

5.2 The Permittee shall perform a daily check of visible emissions from Baghouses BH1 and BH2, when operated. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The check shall be conducted at least once for each day or portion of each day of operation using procedures a. through c. below except when scheduling, atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Scheduling prevents a daily VE check only when an emission unit is not operating during a regularly scheduled time period established for the daily VE checks.

[391-3-1-.02(6)(b)1]
a. Determine, in accordance with the procedures specified in paragraph c. of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b. of this condition.

b. For each baghouse that exhibits visible emissions, the Permittee shall determine the cause of the visible emissions and correct the problem within 24 hours. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.

c. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

5.3 Within 60 days of the issuance of this permit, the Permittee shall develop and implement a Preventive Maintenance Program for Baghouses BH1 and BH2. The program shall be subject to review and, if necessary to assure compliance, modification by the Division and shall include, at a minimum, the following operation and maintenance checks that shall be made at least weekly. A record of the findings and corrective actions taken shall be kept in a maintenance log:

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

a. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.

b. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

c. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.

d. Check dust collector hoppers and conveying systems for proper operation.

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

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

6.2 Within 180 days of the initial startup of the facility (including the wood working process and baghouses), the Permittee shall conduct a PM performance test at each of the baghouses ID Nos. BH1 and BH2). Both tests shall be conducted simultaneously and at the maximum design throughput rate of the wood working process (ID No. WW). The Permittee shall validate that the combined PM emissions from BH1 and BH2 be lower than 18.26 pounds per hour. In the event that the test is not conducted at a minimum of 85% of the wood working process maximum design throughput rate, the Permittee shall adjust the tested PM emission rates to 100% of the maximum design throughput rate and validate the combined adjusted PM emission rates be lower than 18.26 pounds per hour.

7. Notification, Reporting and Record Keeping Requirements

7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354

7.2 The Permittee shall maintain a log of the pressure drop monitoring required by Condition 5.1. As a minimum, the record shall include the date and time of the observation, the filter manufacturer’s recommended maximum pressure drop, the observed pressure drop, and note if the filter media was changed.
7.3 The Permittee shall retain 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.

7.4 The Permittee shall use the monthly usage records required in Condition 7.3 to calculate the total monthly VOC emissions from the entire facility. All variables used in the calculation, including any Division-approved emission factors or control efficiencies, shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the total VOC emissions equal to or exceed 8.25 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1.

7.5 The Permittee shall use the calculations required by Condition 7.4 to determine the total VOC emissions from the entire facility for each twelve consecutive month period. The Permittee shall notify the Division in writing if the total VOC emissions equal or exceed 99 tons during any consecutive 12-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.

8. Special Conditions

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

8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Application & Annual Permit Fees.”