



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Jeng-Hon Su
FROM: Dawn Wu
DATE: March 15, 2022

Facility Name: **Morito Scovill Americas, LLC**
AIRS No.: 137-00008
Location: Clarksville, GA (Habersham County)
Application #: 28302
Date of Application: February 18, 2022

Background Information

Morito Scovill Americas, LLC (hereinafter “facility”) is an existing fastener manufacturing facility located at 1802 Scovill Drive in Clarksville (Habersham County). The facility currently operates under a synthetic minor Permit No. 3963-137-0008-S-03-0.

Purpose of Application

Morito Scovill Americas, LLC submitted an application dated February 18, 2022 for the installation of a new nickel plating line (ID No. 65) and the removal of the existing nickel plating line (ID No. 64) (assigned Application No. 28302). A public advisory was issued on March 2, 2022 for this application.

The facility is located in Habersham County, an attainment area for all criteria pollutants. The facility is a synthetic minor source under Title V of 1990 CAAA because its potential-to-emit (PTE) for VOC emissions is limited to less than 100 tpy and its PTE’s for single/combined HAP are limited to less than 10/25 tpy.

Updated Equipment List

The facility indicated that the entire existing nickel plating line (ID No. 64) is removed from the permit as part of this modification in the email of 3/10/2022.

Emission Units			Associated Control Devices	
Source Code	Description	Installation Date	Source Code	Description
63	Paint Booth	1987	-	-
64	Nickel Plating Line	1994	-	-
65*	Nickel Plating Line	2022	-	-
-	Cyanide Dip Tank	1985	-	-
-	Electro Black 85	1985	-	-

*Proposed within current application

Fuel Burning Equipment

Source Code	Input Heat Capacity (MMBtu/hr)	Description	Installation Date	Construction Date
B1	4	Natural gas fired boiler	2019	2019

Emissions Summary

Facility-Wide Emissions (in tons per year)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
PM/PM ₁₀ /PM _{2.5}	2.70	2.70	0	2.70	2.70	0
NO _x	19.0	19.0	0	19.0	19.0	0
SO ₂	0.10	0.10	0	0.10	0.10	0
CO	3.80	3.80	0	3.80	3.80	0
VOC	<100	<100	0	<100	<100	0
Max. Individual HAP	<10	<10	0	<10	<10	0
Total HAP	<25	<25	0	<25	<25	0
Total GHG (if applicable)	2050	2050	0	2050	2050	0

Regulatory Applicability

The new nickel plating line is subject to 40 CFR Part 63 Subpart WWWW – NESHAP: Area Source Standards for Plating and Polishing Operations. Nickel is one of five target HAPs subject to this rule, and therefore the facility must meet all applicable standards outlined in 40 CFR Part 63 Subpart WWWW.

Permit Conditions

The new nickel plating line (ID No. 65) will be subject to the requirements of existing Conditions 2.1, 2.2, 2.4 through 2.6., and 7.3 through 7.11.

New Condition 2.9 is the avoidance of 40 CFR 63 Subpart JJJJJ and requires that all boiler(s) onsite fire natural gas only.

New Condition 2.10 is the GA Rule (b) requirement that applies to the new nickel plating line (ID No. 65) and all existing manufacturing processes.

New Condition 2.11 is the GA Rule (e) PM emission standards that apply to the new nickel plating line (ID No. 65) and all existing manufacturing processes.

New Condition 7.12 requires the facility to submit an initial notification for the new nickel plating line.

New Condition 7.13 requires the facility to submit an initial compliance certification for the new nickel plating line.

Toxic Impact Assessment

A TIA is not needed since the facility-wide emissions are expected unchanged. The facility is still SM for VOC and single/combined HAP.

Summary & Recommendations

I recommend that Permit Amendment No. 3965-137-0008-S-03-1 be issued to the facility. A public advisory was issued on March 2, 2022 and was due on April 1, 2022. No comment has been received. The Mountain District (Cartersville) will remain responsible for compliance and inspections.