

## **NARRATIVE**

TO: Jeng-Hon Su

FROM: Valon Pireva

DATE: March 26, 2025

Facility Name: **Mannington Commercial**  
AIRS No.: 04-13-129-00025  
Location: Calhoun, GA (Gordon County)  
Application #: 29623  
Date of Application: February 27, 2025

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### **Background Information**

Mannington Commercial (hereinafter “facility”) is an existing facility located at 1844 US Highway 41 SE Calhoun, Georgia, Gordon County. Gordon County is in attainment for all criteria air pollutants. The facility is a synthetic minor source currently permitted under Air Quality Permit No. 2273-129-0025-S-05-0 and its amendments. Air Quality Permit Amendment No. 2273-129-0025-S-05-1 was issued for the construction and operation of a new compounding line and Rigid Core Luxury Vinyl Tile (LVT) operation. Air Quality Permit Amendment No. 2273-129-0025-S-05-2 was issued for the removal of Boiler B005, Modular Carpet Line MPTC and Modular Carpet Line – Vinyl & Olefin/Polyolefin & Vinyl (Line 2) (MOTC). Air Quality Permit Amendment No. 2273-129-0025-S-05-3 was issued to re-include Modular Carpet Line – Vinyl & Olefin/Polyolefin & Vinyl (Line 2) (MOTC) in the list of equipment at the facility. Air Quality Permit Amendment No. 2273-129-0025-S-05-4 was issued to remove Space Dye Lines SDL, Rigid Core Plant Group RC01 and associated control devices, Re-Work Line RW01, Material Silo MS13, and Foam/Glue Line Process GL01. The facility also requested to revise the ID number of the Urethane Coating Process from UC01 to UC02 and specified that there are 12 baghouses to control PM emissions from Material Silos MS01 through MS12.

### **Purpose of Application**

The facility submitted Application No. 29623 for the removal of Boiler B004 and replacing it with a new boiler (ID No. B012). B012 is capable of firing natural gas only, and has the same design heat input capacity as B004’s, 10.6 MMBtu/hr.

**Updated Equipment List**

Emission Units			Associated Control Devices	
Source Code	Description	Installation Date	Source Code	Description
LCDL	Latex Coater (Carpet)	--	LRTD	Regenerative Thermal Oxidizer
LHO	HP Line (Carpet)	--	--	--
NLCL	Low VOC Latex Coating Line (Carpet)	2012	--	--
BM01	Banbury Mixer	2019	DC01	Dust Collector
RP01	Rubber Finishing Plant	2019	DC02	Dust Collector
MS01	Material Silo 1 (Carpet)	Late 1970's	BH01	Baghouse
MS02	Material Silo 2 (Carpet)	Late 1970's	BH02	Baghouse
BS01	Back Sanding Operation	2019	DC03	Dust Collector
UC01	Urethane Coating (Modular)	2019	--	--
GR01	Granulator/Refining Mill (John B Campbell, JBC building)	2019	DC04	Dust Collector
CP01	Compounding Plant	2019	DC05-DC24	Dust Collectors
MS03	Material Silo (Modular)	2019	BH03	Baghouse
MS04	Material Silo (JBC building)	2019	BH04	Baghouse
MS05	Material Silo (JBC building)	2019	BH05	Baghouse
MS06	Material Silo	2019	BH06	Baghouse
MS07	Material Silo	2019	BH07	Baghouse
MS08	Material Silo	2019	BH08	Baghouse
MS09	Material Silo	2019	BH09	Baghouse
MS10	Material Silo	2019	BH10	Baghouse
MS11	Material Silo	2019	BH11	Baghouse
MS12	Material Silo	2019	BH12	Baghouse
UC02	Urethane Coating (JBC building)	2019	--	--
MOTC	Modular Carpet Line – Polyolefin and vinyl (MOTC: Modular Olefin Thermoplastic Compound)	2020	--	--

**Fuel Burning Equipment**

Source Code	Input Heat Capacity (MMBtu/hr)	Description	Installation Date	Construction Date
B001	65.7	Natural gas-fired boiler	1983	Before 1982
B004	10.6	Natural gas/propane boiler	1999	1977
B007	1.256	Natural gas-fired boiler	1975	1975
B008	2.4	Natural gas-fired boiler	1999	1999
<b>B012</b>	<b>10.6</b>	<b>Natural gas-fired boiler</b>	<b>2025</b>	<b>2025</b>

New emission units are in bold.

During the courtesy review of the draft synthetic minor (SM) permit amendment, the facility notified the Division that Boiler B001 was decommissioned and removed from premises in 2018 or 2019. The facility also operates two small boilers (ID Nos. B007 and B008) that have not been included in the Fuel Burning Equipment table of the previous narratives. B007 and B008 have been included in the table above.

Note that both boilers burn natural gas only, therefore, they are not subject to 40 CFR 63 Subpart JJJJJ. Gordon County is not on the county list for GA Rule (rrr). They are exempt from permitting per GA Rule 391-3-1-.03(6)(b)1. B007 and B008 are therefore not included in the proposed SM permit amendment.

**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 <sub>10</sub> /PM <sub>2.5</sub>	<100	<100	0	<100	<100	0
NO <sub>x</sub>	6.12	6.12	0	6.12	6.12	0
SO <sub>2</sub>	<100	<100	0	<100	<100	0
CO	5.14	5.14	0	5.14	5.14	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)	<100,000	<100,000	0	<100,000	<100,000	0

**Regulatory Applicability****40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

Because Boiler B012 has a heat input capacity between 10 and 100 MMBtu/hr and has a construction date after June 9, 1989, it is subject to Subpart Dc. The facility is required to maintain records of the amount of each fuel combusted during each calendar month, per 40 CFR 60.48c(g)(2).

**40 CFR 63 Subpart JJJJJJ – Hazardous Air Pollutants for Industrial, Commercial, and Industrial Boilers Area Sources**

Because the facility is an area source of HAP emissions, Boiler B012 is potentially subject to 40 CFR 63 Subpart JJJJJJ. In order to be considered a gas-fired boiler and avoid being subject to 40 CFR 63 Subpart JJJJJJ, Boiler B012 are limited to fire natural gas exclusively.

**Georgia Rule 391-3-1-.02(2)(d), Fuel Burning Equipment**

Georgia Rules (d)3. and (d)2.(ii) limits the visible emissions and rate of emission of particulate matter from fuel burning equipment with a capacity between 10 MMBtu/hr and 250 MMBtu/hr. Boiler B012 burns natural gas which is considered clean fuel. Therefore, Boiler B012 is expected to comply with both the PM emission limit and visible emission limit of Georgia Rule (d).

**Georgia Rule 391-3-1-.02(2)(III), NOx Emissions From Fuel-Burning Equipment**

Georgia Rule (III) limits NOx emissions from fuel-burning equipment with a heat input capacity between 10 MMBtu/hr and 250 MMBtu/hr to a maximum of 30 ppmv at 3% oxygen on a dry basis. This rule applies to fuel-burning equipment that were installed after May 1<sup>st</sup>, 1999, in Gordon County. These requirements apply to the equipment during the period between May 1<sup>st</sup> and September 30<sup>th</sup> of each year. The facility is required to conduct annual tune ups on Boiler B012 in order to demonstrate compliance with the GA Rule (III) NOx emission limit.

**Permit Conditions**

New Condition 2.3 subjects Boiler B012 to 40 CFR 60 Subpart A and Subpart Dc.

Existing Condition 2.3 and 2.4 have been merged into new Condition 2.4. This condition limits particulate emissions and visible emissions from the boilers according to Georgia Rule (d) since Boiler B012 was constructed after year 1972.

New Condition 2.6 subjects Boiler B012 to the GA Rule (III) NOx emission limit during the ozone season.

Condition 2.7 has been modified to restrict Boiler B012 to burning only natural gas. This condition is for avoidance of 40 CFR 63 Subpart JJJJJJ.

Condition 2.8 has been deleted due to the removal of Boiler B004.

Condition 5.2 has been added requiring the facility to conduct annual boiler tune-up for Boiler B012 in accordance with Georgia Rule (III).

Condition 7.8 has been modified due to modification of boilers in facility (replacement of Boiler B004 with Boiler B012). This condition requires the facility to maintain records of monthly natural gas consumption from Boiler B012.

### **Toxic Impact Assessment**

Replacement of Boiler B004 with Boiler B012 without increasing the design heat input rate will not cause any TAP emission increases; therefore, a Toxic Impact Assessment is not required.

### **Summary & Recommendations**

I recommend that Permit Amendment No. 2273-129-0025-S-05-5 be issued to the facility. Because potential emissions from new Boiler B012 itself are below the associated cumulative modification permit exemption thresholds, a public advisory was not issued. The Mountain District, Cartersville Office, will remain responsible for compliance and inspection of the facility.