

Facility Name: Premium Fiberglass Pools
City: Ashburn
County: Turner
AIRS #: 04-13-287-00024

Application #: TV-321410
Date Application Received: March 15, 2021
Permit No: 3088-287-0024-V-05-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Premium Fiberglass Pools

2. Parent/Holding Company Name

Premium Fiberglass Pools

3. Previous and/or Other Name(s)

Nationwide Fiberglass, Inc.

4. Facility Location

96 One Georgia Drive
Ashburn, GA 31714

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3088-287-0024-V-04-0	February 7, 2019	Ownership Change

D. Process Description

1. SIC Codes(s)

3088

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility manufactures fiberglass swimming pool products.

3. Overall Facility Process Description

The fiberglass pool manufacturing process begins with a job specific mold, customized or standard specification. The shop formed mold is coated with a releasing agent or wax to assist with the separation of the liner from the mold after the fabrication process is completed. Once the mold is coated, the "inside-out" pool layering begins. A layer of clear or colored gel coat is applied to the mold, creating the smooth, outside surface of the pool. The reinforcement layers are applied onto the cured gel coat through a fiberglass hand lay-up and fiberglass chopper gun process. As this first layer of resin begins to cure, strands of fiberglass are chopped and sprayed into a stream of vinyl ester resin over the colored surface. This becomes stitched fiberglass sheets. Each layer is individually saturated with resin and completely hand rolled to ensure each layer bonds properly. The woven fiberglass mats are applied so that alternating layers reinforce the structure in approximately four to five layers total. Although pool sizes vary depending on customer, an average size is estimated at 15 feet by 30 feet. This is a relatively slow, labor-intensive process; an estimate of a maximum of two pools per booth will be fabricated from beginning to final curing. After final curing, the pools go through a grinding and polishing stage before plumbing fixtures are placed finishing the manufacturing process.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility wide potential volatile organic compound (VOC) emissions are less than 250 tpy; moreover, hazardous air pollutants (HAP) emissions are limited to less than 100 tpy and all other criteria pollutant emissions are less than 100 tpy. Therefore, the facility is considered a minor source for PSD and NSR purposes.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes			✓
TRS	No			✓
H ₂ S	No			✓
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		
Total GHGs	No			✓

3. MACT Standards

Premium Fiberglass Pools is considered a major source for HAP emissions and is subject to 40 CFR 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*. Because it is subject to this Maximum Available Control Technology (MACT) standard, Premium Fiberglass Pools is also subject to 40 CFR 63 Subpart A *General Provisions*.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

Per Enforcement Case # 2610, the facility failed to take pressure drop readings across any of the coating booths (ID Nos. B-1, B-2 and B-3) within the time period required by existing Condition 3.5.1. With the help of Ms. Sherry Waldron of the Division's Stationary Source Compliance Program, the facility submitted a request to modify Condition 3.5.1 to only require weekly replacement of the filters with this application, (No. 321410).

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
B-1	Fiberglass & Gel Coat Laminating Booth 1	40 CFR 63 Subpart A 40 CFR 63 Subpart WWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Fabric Exhaust Filters	B-1
B-2	Fiberglass & Gel Coat Laminating Booth 2	40 CFR 63 Subpart A 40 CFR 63 Subpart WWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Fabric Exhaust Filters	B-2
B-3	Fiberglass & Gel Coat Laminating Booth 3	40 CFR 63 Subpart A 40 CFR 63 Subpart WWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Fabric Exhaust Filters	B-3

B. Equipment & Rule Applicability

Choose the applicable option(s) below:

Emission and Operating Caps:

The three coating booths are limited to less than 100 tons of HAP during any twelve consecutive months in order to avoid the additional control requirements associated with 40 CFR 63.5805.

Rules and Regulations Assessment:

The facility is subject to Federal Rule 40 CFR 63 Subpart WWW - *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*. 40 CFR 63 Subpart WWW sets forth four different methods for compliance with the standard: demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit; demonstrate that on average the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type is being met; demonstrate compliance with a weighted average emission limit for all open molding operations; or meet the organic HAP emission limit for one application method and use the same resin(s) for all application methods of that resin type.

The facility is subject to Georgia Rule 391-3-1-.02(2)(b) – *Visible Emissions* and will routinely comply with the opacity limits through the venting of process emissions through the use of serviceable filter media.

The facility is also subject to Georgia Rule 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes* and will routinely comply with the opacity limits through the venting of process emissions through the use of serviceable filter media.

C. Permit Conditions

Condition 3.2.1 limits HAP emissions from the open molding operations (Emission Unit ID Nos. B-1, B-2, and B-3) to less than 100 tons per year (tpy).

Conditions 3.3.1 through 3.3.5 contain HAP emission limits and work practice standards required by 40 CFR 63 Subpart WWW.

Conditions 3.4.1 and 3.4.2 contain requirements set by Georgia State Rules (e) and (b).

According to a records analysis conducted by Ms. Sherry Waldron, Air Pollution Control Device ID: Fabric Exhaust Filters, which control emissions from the coating booths (Emission Unit ID Nos. B-1, B-2, and B-3) the pressure drop across the filters is minimal and does not change over time. Therefore, the Division agrees that Condition 3.5.1 can be modified to only require weekly replacement of the filters.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to conduct weekly inspections of mixing, cleaning, and material storage operations for compliance with the Subpart WWW work practice requirements Condition 3.3.5. The facility is also required to document the date and time of these inspections.

Condition 5.2.2 requires the facility to record when the filter media is replaced per the requirements of Condition 3.5.1.

According to a records analysis conducted by Ms. Sherry Waldron, Air Pollution Control Device ID: Fabric Exhaust Filters, which control emissions from the coating booths (Emission Unit ID Nos. B-1, B-2, and B-3) the pressure drop across the filters is minimal and does not change over time. Therefore, the Division agrees that Condition 5.2.3, which required daily monitoring of filter pressure drop values can be removed.

C. Compliance Assurance Monitoring (CAM)

Because the potential to emit (PTE) for each filter is less than 100 tons per year (tpy), there is no specific individual piece of equipment that is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring."

VI. Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements**1. Record Keeping Required by 40 CFR 63 Subpart WWWW**

Condition 6.2.1 through 6.2.14 detail the specific Record Keeping and Reporting Requirements by 40 CFR 63 Subpart WWWW.

2. Other Record Keeping and Reporting Requirements

Condition 6.2.15 requires the facility to maintain a log of the filter changes for the gel coat and resin operations, where the date and time of each filter change is indicated along with the initials of the person changing the filter. This condition also requires the facility to report and log any failure to replace the filters.

VII. Specific Requirements**A. Operational Flexibility**

None applicable.

B. Alternative Requirements

There are no applicable alternative requirements.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below. //