

Facility Name: **MTI Baths, Inc.**
 City: Commerce
 County: Jackson
 AIRS #: 04-13-157-00062

Application #: TV-434612
 Date Application Received: November 20, 2019
 Permit No: 3088-157-0062-V-02-0

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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: MTI Baths, Inc.

2. Parent/Holding Company Name

MTI Baths, Inc.

3. Previous and/or Other Name(s)

The facility has not been known by any previous or other name.

4. Facility Location

85 Walnut St. Commerce, GA 30529 (Jackson County)

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

Jackson County is an attainment area for all pollutants.

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
Permit No. 3088-157-0062-E-01-0	March 9, 2018	Construction and operation of a fiberglass-resin reinforced plastic products manufacturing facility.

D. Process Description

1. SIC Codes(s)

3088: Establishments primarily engaged in manufacturing plastics plumbing fixtures

The SIC Code identified above was 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)

The facility produces fiberglass-resin reinforced plastic products.

3. Overall Facility Process Description

In the gelcoat process, gelcoat is spray applied (non-atomized) into molds via an internal mix spray gun. Once cured, the product is transferred to either the autocaster process or the fiberglass resin process for further processing. In the autocaster process, a polyester/marble resin is mixed with a catalyst and pumped through an autocaster into a 2-piece mold which is closed except for the hole through which the resin/catalyst is poured. The resin is allowed to cure inside this mold. Once cured, the mold is separated, and the formed part is trimmed/sanded and packaged for shipment. The hand-held sanders used in the finishing process are equipped with vacuum systems (attached to the units) in order to minimize particulate emissions. In the fiberglass resin process, fiberglass, resin, and catalyst, are spray applied (non-atomized) via an internal chop gun onto either an acrylic shell or previously gelcoated part. Once cured, the formed part is finished (trimmed/sanded) and packaged for shipment. A coating operation is also be utilized to occasionally prime/coat metal parts that will be attached to the formed products.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application. During the review, it was noted that Stack 2 had changed from the previous application. Stack 2 was formerly associated with the Autocaster Operation AC1. It is now associated with the new TRIM process. The Autocaster Operation AC1 does not have a dedicated stack.

The TRIM process uses a saw blade to cut the bottom of the manufactured bathtubs to remove excess material from the bottom and ensure the tubs are level. The process is performed in a booth equipped with a flat fiberglass filter, similar to the gelcoat booth.

The TRIM process removes a very small portion of each tub (1/8 inch cut for a tub that measures roughly 30 inches high). The facility estimated the annual PM emissions (assuming 95 percent control by the fiberglass filter) to be approximately 0.04 tons annually, and potential emissions to equal to 0.1 tons annually. Due to the low PTE, the TRIM process was added to the Insignificant Activities Section of the Title V Permit.

Since the stack configuration changed, the facility was instructed to provide an updated Toxic Impact Assessment. The updated TIA was submitted by email on February 27, 2020 and demonstrated that styrene emissions were below the AAC values (< 5% of AAC). The TIA documentation will be included as part of this permit application file.

E. Regulatory Status

1. PSD/NSR

The facility is potentially a major source in regard to the PSD/NSR regulations; however, the facility has a 99 ton per year VOC emission cap to avoid permitting under the PSD/NSR regulations.

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 GHG's	Yes			✓

3. MACT Standards

MTI Baths, Inc. is subject to 40 CFR 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*. MTI Baths, Inc. is required to comply with all applicable standards of Subpart WWWW.

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:

The facility-wide VOC emissions are limited to 99 tons per year for the facility to avoid additional requirements of 40 CFR 63 Subpart WWWW - *Reinforced Plastic Composites Production*.

With regard to the coating operation, the coating process is not subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63 Subpart MMMM). MTI will be applying these coatings using only hand-held non-refillable aerosol containers and are exempt from the standard per 40 CFR 63.3881(a)(1).

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted during this application.

D. Permit Conditions

Condition 2.1.1 limits the VOC emissions from the entire facility to less than 99 tons during any twelve consecutive month period.

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
GC1	Gelcoat Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart WWWW	FT1	Fabric Filter
AC1	Autocaster Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart WWWW	N/A	N/A
FGR1	Fiberglass Resin Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 63 Subpart A 40 CFR 63 Subpart WWWW	FT2	Fabric Filter
COAT	Coating Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FT3	Fabric Filter
CLN	Cleaning Process	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	N/A

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

The facility will continue to be subject to the following:

- Georgia Air Quality Rule 391-3-1-.02(2)(b) - *Visible Emissions*
- Georgia Air Quality Rule 391-3-1-.02(2)(e) - *Particulate Emission from Manufacturing Processes*
- 40 CFR 63 Subpart WWWW - *Reinforced Plastic Composites Production* which applies to the gel coat and resin spray booths, cultured marble, and mold forming

C. Permit Conditions

Conditions 3.3.1 through 3.3.4 detail the requirements of 40 CFR 63 Subpart WWWW.

Condition 3.3.1 subjects the applicable emission sources to 40 CFR 63 Subpart WWWW.

Condition 3.3.2 lists operations which may occur at the facility that will not be regulated under 40 CFR 63 Subpart WWWW.

Condition 3.3.3 lists the organic HAP content emissions limits for resins and gel coats of each open molding operation.

Condition 3.3.4 lists the work practice standards the facility must comply with regarding new or existing cleaning operations, organic HAP-containing materials storage operations and organic HAP-containing material mixing operations.

Condition 3.4.1 subjects the facility to Georgia Rule (b).

Condition 3.4.2 subjects the facility to Georgia Rule (e).

Condition 3.5.1 requires that the particulate matter filters to be operated while gelcoat is being applied in the spray booths and to change filters when the pressure drop falls outside of the manufacturer's recommended value.

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 that the pressure drop across the filters for the spray booth be monitored and recorded daily if operated.

C. Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring (CAM) is not applicable to the facility because the pre-controlled emissions for each emission unit with an associated air pollution control device are less than 100 tons per year each.

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

40 CFR 63 Subpart WWWW

Condition 6.2.1 details the information sources and methods to be used to determine the organic HAP content of the gel coats and resins used at the facility.

Condition 6.2.2 lists the emission factors and equations used to calculate the organic HAP emissions from the facility using either the “Calculated organic HAP emission factor option,” “HAP emission factor averaging option,” or the “HAP content limit option.”

Conditions 6.2.3 and 6.2.4 require compliance with emission limits in Condition 3.3.3 and with HAP content limits listed in Table 6.2.2-2.

Condition 6.2.5 requires continuous compliance with the work practice standards listed in Condition 3.3.4.

Condition 6.2.6 requires records of usage, organic HAP content, and type of operation for each resin and gel coat used while complying with the organic HAP emission limits.

Condition 6.2.7 allows no usage records if all resins and gel coats used comply with the content limits or emission limits. A compliance report must be submitted for this option. If a higher HAP-content gel coat is used or an application method that results in increased organic HAP emissions is employed, compliance with the content or emissions limits will have to be demonstrated again or usage records will have to be collected.

Condition 6.2.8 lists the notifications and reports that must be submitted to the Division.

Conditions 6.2.9 and 6.2.10 list the records to be maintained onsite at the facility and require maintenance of the records.

General VOC Record Keeping and Reporting Requirements

Condition 6.2.11 requires usage records for all VOC-containing materials utilized at the facility.

Condition 6.2.12 requires the facility to calculate monthly VOC emissions from the entire facility.

Condition 6.2.13 requires the facility to calculate monthly rolling 12-month total VOC emissions from the entire facility and to notify the Division if any 12-month total equals or exceeds 99 tons.

Condition 6.2.14 contains the equations and methods used to calculate the monthly VOC emissions from the facility.

Condition 6.2.15 requires a logbook of the date and time that the filters for the spray booth are replaced.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

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

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

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.//