

Facility Name: **LX Hausys America, Inc.**  
City: Adairsville  
County: Gordon  
AIRS #: 04-13-129-00075

Application #: TV-726093  
Date Application Received: January 12, 2023  
Permit No: 3088-129-0075-V-06-0

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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: LX Hausys America, Inc.

2. Parent/Holding Company Name

LG Hausys America Inc.

3. Previous and/or Other Name(s)

LG Chem Industrial Materials Inc. (October 12, 2004, through June 17, 2009).

LG Hausys America, Inc. (June 18, 2009, through June 5, 2022).

4. Facility Location

310 LX Drive, SE, Adairsville, Georgia [Gordon County]

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

The facility is located in a county designed as attainment or unclassifiable for all applicable National Ambient Air Quality Standards. The facility is located in a county deemed to be contributing to Atlanta's ozone nonattainment per Georgia Rule 391-3-1-.03(8)(e).

### B. Site Determination

<b>Table 1: Site Determination</b>	
<b>Applicable Regulation</b>	<b>Site Determination</b>
New Source Review/PSD	<p>Process lines L001, L002, L003, L004 and L005 are stand-alone manufacturing lines located on contiguous property. Process lines L002 and L004 are located under the same roof and these process lines are located in a building separate from process lines L001 and L003. Process lines L001 and L003 are each located in separate buildings.</p> <p>Process lines L001, L002, L004 and L005 operate under the same SIC Code, namely 3088.</p> <p>Process line L003 operates under a different SIC Code, namely 2295.</p> <p>Process lines L001, L002, L003, L004 and L005 are under common control.</p> <p>Process line L003 is a separate source from process lines L001, L002, L004 and L005 for purposes of New Source Review/PSD because LX operates L003 under a different two-digit SIC Code and the line is not classified as a support facility for process lines L001, L002, L004 and L005.</p>

<b>Table 1: Site Determination</b>	
<b>Applicable Regulation</b>	<b>Site Determination</b>
NESHAP Applicability Title V Applicability	<p>Process lines L001, L002, L003, L004 and L005 are under common control and are located on contiguous property.</p> <p>These five process lines constitute one site for purposes of NESHAP applicability. LX operates under a facility-wide individual/total hazardous air pollutant (HAP) emissions limits to remain an SM for HAPs.</p>

### C. Existing Permits

Table 2 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 2: List of Current Permits, Amendments, and Off-Permit Changes**

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3088-129-0075-V-05-0	07/12/2018	Initial Title V permit for lines L001, L002, L003 and L004. Facility remains a synthetic minor (SM) for HAP emissions.
3088-129-0075-V-05-1	11/09/2018	Minor modification for construction and operation of a new engineered stone countertop Viatera production line (L005).
3088-129-0075-V-05-2	06/01/2022	Permit Amendment to change name from LG Hausys of America, Inc. to LX Hausys of America, Inc. The street name address changed from LG to LX Dr SE.
3088-129-0075-V-05-3		Revoked by 3088-129-0075-V-05-4 after EPA review comments.
3088-129-0075-V-05-4	09/08/2023	Minor modification to process line L001: addition of 2 syrup hoppers, 3 marbling mixers, 3 compound mixers, and 1 cushion mixer. Also, a new storage silo and 3 scale hoppers with new bin vents. Reroute of existing belt coating/casting operations (ID No. BC001) and oven (ID No. OV001) emissions to a new carbon bed filter (ID No. CB01).

## 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)

The facility consists of five process lines: Line L001 produces acrylic slab counter-tops (Hi-MACS), Lines L002, L004 and L005 produce engineered stone counter-tops (VIATERA), and Line L003 known as the "Autoskin" line manufactures synthetic leather for the automotive industry.

### 3. Overall Facility Process Description

#### Process Lines L001, L002, L004 and L005

The operations on each of these process lines consist of chemical storage, pneumatic conveying, mixing, blending, molding, curing, cutting, sanding and/or polishing, packaging and shipping.

#### Process Line L003

Solid and liquid raw materials are fed to mixers which operate in series. The mixers combine the raw materials and produce a dough-like intermediate product. The dough is then calendered onto fiber backing cloth to produce the semi-finished roll of synthetic leather product. The semi-finished product roll is then fed into expander ovens which operate in series. In the ovens, the ADA blow agent decomposes to carbon monoxide and nitrogen, thereby expanding the product. The product is then fed to roll coaters, each with a corresponding steam-fueled drying oven. After drying, the finished product roll is wound and packaged for shipment.

### 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 is not one of the 28 named source categories under 40 CFR 52.21(b) and therefore the major source threshold is 250 tons per year of a regulated NSR pollutant. The PSD/NSR site consisting of process lines L001, L002, L004 and L005 remains a PSD minor source through the operation of baghouses for control of particulate matter (PM, PM<sub>10</sub>, PM<sub>2.5</sub>). This same PSD/NSR site remains a PSD minor source for volatile organic compounds (VOCs) through the operation of several permanent total enclosures exhausting through RTOs. The PSD/NSR site consisting of process line L003 operates baghouses, a permanent total enclosure and an RTO to remain a PSD minor source for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOCs.

LX has the potential to emit emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and sulfur dioxide (SO<sub>2</sub>) in amounts less than 25 tpy, each.

### 2. Title V Major Source Status by Pollutant

Table 3 summarizes the Title V major source status for process lines L001, L002, L003, L004 and L005, on a combined basis.

<b>Table 3: Title V Major Source Status</b>				
<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>If emitted, what is the facility's Title V status for the pollutant?</b>		
		<b>Major Source Status</b>	<b>Major Source Requesting SM Status</b>	<b>Non-Major Source Status</b>
PM	✓	✓		
PM <sub>10</sub>	✓	✓		
PM <sub>2.5</sub>	✓	✓		
SO <sub>2</sub>	✓			✓
VOC	✓	✓		
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS				
H <sub>2</sub> S				
Individual HAP Entire Facility <sup>1</sup>	✓		✓	
Total HAPs Entire Facility	✓		✓	

<sup>1</sup> Individual HAPs emitted by entire facility include methyl methacrylate (MMA), styrene, and dimethylformamide.

### 3. MACT Standards

The facility operates two boilers that are natural gas fired only and therefore not subject to the requirements of 40 CFR 63 Subpart JJJJJ. LX is subject to 40 CFR 63 Subpart ZZZZ for one emergency generator. The other four emergency generators are also subject to 40 CFR 63 Subpart ZZZZ, but the only requirement is to meet NSPS IIII.

The facility is classified as a synthetic minor (SM) for individual and total HAP emissions as they have taken facility-wide emissions limits for individual and total HAPs.

### 4. Program Applicability (AIRS Program Codes)

LX is subject to 40 CFR 60 Subparts A, Dc, IIII and VVV. In addition, LX is subject to 40 CFR 63 Subpart ZZZZ for an emergency generator.

<b>Table 4: Program Codes</b>	
<b>Program Code</b>	<b>Applicable (y/n)</b>
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

## Regulatory Analysis

### II. Facility Wide Requirements

#### A. Emission and Operating Caps:

LX operates under a facility-wide emissions limit for individual and total HAP emissions at 10 tons per year and 25 tons per year, respectively. These emissions limits are carried over to this renewal Title V Permit.

LX operates under the requirements, noted in Table 5, that aid in maintaining actual individual and total HAP emissions less than 10/25 tons per year.

<b>Table 5: Process Operating Requirements to Aid in SM Status for HAPs</b>		
<b>Line #</b>	<b>Emissions Units</b>	<b>Requirement</b>
L001	Compound mixers, casting operation, and cleaning and additive rooms.  Hoppers, chemical storage tanks, mixers, compound mixers, cleaning and additive rooms, and belt coating and casting ovens.	Operate within an enclosure that satisfies the requirement of Method 204 for Permanent Total Enclosures.  Exhaust through the applicable RTO, Big Vent filters, and Carbon Bed Filter.
L002	Resin and catalyst storage tanks, service tanks, weighing stations, mixers, and forming operation.	Exhaust through the applicable RTO.
L003	Roll coaters  Roll coaters and associated drying ovens.	Operate within an enclosure that satisfies the requirement of Method 204 for Permanent Total Enclosures.  Exhaust through the applicable RTO.
L004	Resin and catalyst storage tanks, service tanks, weighing stations, mixers, and forming operation.	Exhaust through the applicable RTO.
L005	Resin and catalyst storage tanks, service tanks, weighing stations, mixers, and forming operation.	Exhaust through the applicable RTO.

#### B. Applicable Rules and Regulations

Not applicable.

#### C. Compliance Status

The facility appears to be operating in compliance.

## D. Permit Conditions

Table 6 summarizes the permit condition for Section 2 of LX's Title V Renewal Permit.

<b>Table 6: Facility Wide Emissions</b>	
<b>Permit Condition No.</b>	<b>Discussion</b>
2.1.1	<b>No change</b> – Existing SM limit for HAPs is carried over to this Title V renewal.

## III. Regulated Equipment Requirements

## A. Equipment List for the Process

Table 7 summarizes the equipment list at LX.

<b>Emission Units</b>			<b>Air Pollution Control Devices</b>	
<b>ID No.</b>	<b>Description</b>	<b>Applicable Requirements/Standards</b>	<b>ID No.</b>	<b>Description</b>
<b>Process Line L001 – HiMACS®</b>				
AS101	Al(OH) <sub>3</sub> Silo	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF101	Bin Vent Filter
AS102	Al(OH) <sub>3</sub> Silo	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF102	Bin Vent Filter
PS101	PMMA Silos	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF103	Bin Vent Filter
PH102	PMMA Scale Hopper	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF104 BF105	Bin Vent Filter Bin Vent Filter
AH102	Al(OH) <sub>3</sub> Scale Hopper	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF106	Bin Vent Filter
AH103	Al(OH) <sub>3</sub> Scale Hopper	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF107	Bin Vent Filter
CW001	Chip Weighing	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF004	Baghouse
PH101	<u>Hoppers</u> PMMA Bag Dump Hopper	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF201	Baghouse
AH101	Al(OH) <sub>3</sub> Hopper			
SH201	<u>Hoppers</u> PMMA/MMA Scale Hopper	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	OX001	Regenerative Thermal Oxidizer (RTO)
SH202	PMMA/MMA Scale Hopper			
SM301	Syrup Scale Hopper			
SM302	Syrup Scale Hopper			
TK104	<u>Tanks</u> MMA Storage Tank	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	OX001	RTO
TK105	MMA Storage Tank			
DT001	DOP Tank			



Emission Units			Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
SM101 SM102 SM201 SM202 CO001 CH001 CH002 MIX001 CU001	<u>Mixers</u> 1 <sup>st</sup> Syrup Mixers 1 <sup>st</sup> Syrup Mixers 2 <sup>nd</sup> Syrup Mixers 2 <sup>nd</sup> Syrup Mixers Color Mixer Chip Mixer Chip Mixer Mix Room Cushion Mixer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	OX001	RTO
CM001 CM002 DM001 CM003	<u>Compound Mixers</u> Compound Mixers #1 Compound Mixers #2 Demister and Vacuum Pumps Associated with Compound Mixers Compounding Additive Tank	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF005 PTE1 OX001	Baghouse Permanent Total Enclosure RTO
AC001  CL001  PS001	Chemical Recycling Room  Chemical Cleaning Room  Peroxide Additive Storage Room	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	PTE2 OX001	Permanent Total Enclosure RTO
BC001 OV001	Belt Coating/Casting Oven	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	PTE3 CB01	Permanent Total Enclosure Carbon Bed Filter
CM001	<u>Finishing</u> Cutting and Milling Planer #1 Planer #2	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF001 BF002 BF006	Baghouse Baghouse Baghouse
L1NEW	Al(OH) <sub>3</sub> Storage Silo #3	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF100	Bin Vent Filter
	Al(OH) <sub>3</sub> Weigh Hopper #3	391-3-1-.02(2)(e)	BF109	Bin Vent Filter
	Al(OH) <sub>3</sub> Weigh Hopper #4	391-3-1-.02(2)(b)	BF110	Bin Vent Filter
	Al(OH) <sub>3</sub> Weigh Hopper #5	391-3-1-.02(2)(b)	BF111	Bin Vent Filter
	(2) Syrup Scale Hoppers (3) Marbling Mixers (3) Compound Mixers (1) Cushion Mixer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	PTE1 OX002	Permanent Total Enclosure RTO
<b>Process Line L002 Viatera I®</b>				
PREP2A	<u>Preparation A</u> Grit Hoppers Silica Powder Silos Grit Conveying System Filler Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF301 BF304 BF303 BF305	Baghouse Baghouse Baghouse Baghouse
PREP2B	<u>Preparation B</u> UPA Resin Storage Tanks Daily Resin Service Tanks Resin Weighing Tanks Catalyst Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	OX003	RTO
PREP2C	Pigment Preparation Room	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF302	Baghouse
MIX2	Mixers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF301 BF303 BF305 OX003	Baghouse Baghouse Baghouse RTO

Emission Units			Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
FORM2A	<u>Forming</u> Mixture Treatment Units Homogenizing Ring Conveyance/Distributors Mixture Distributor	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF303 BF304 BF305 OX003	Baghouse Baghouse Baghouse RTO
FORM2B	<u>Forming</u> Press (Molding) Kiln (Slab Curing)	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	N/A
FINISH2	<u>Finishing</u> Edge Cutting Calibration Polishing Inspection and Packaging	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	N/A	N/A
<b>Process Line L003 – Autoskin</b>				
MIX3	Mixers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 40 CFR 60 Subpart A 40 CFR 60 Subpart VVV	BF31 BF32 BF33 BF34 BF35 BF36 BF40	Banbury Mixer Dust Collector Conveyance Dust Collector Conveyance Dust Collector Conveyance Dust Collector CaCO <sub>3</sub> Silo Dust Collector PVC Resin Silo Dust Collector Spare Dust Collector
CA01	Calendering	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 40 CFR 60 Subpart A 40 CFR 60 Subpart VVV	N/A	N/A
ED01	<u>Expander Operation</u> Expander Ovens	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	N/A
COAT1	<u>Coating Operation</u> Roll Coaters Dryer Ovens	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 60 Subpart A 40 CFR 60 Subpart VVV	PTE3 RTO1	Permanent Total Enclosure RTO
<b>Process Line L004 – Viatera II®</b>				
PREP4A	<u>Preparation A</u> Grit Hoppers Silica Powder Silos Grit Conveying System Filler Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF41	Baghouse

Emission Units			Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
PREP4B	<u>Preparation B</u> UPA Resin Storage Tanks Daily Resin Service Tanks Resin Weighing Tanks Catalyst Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	RTO2	RTO
PREP4C	Pigment Preparation Room	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF42	Baghouse
MIX4	Mixers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF41 RTO2	Baghouse RTO
FORM4A	<u>Forming</u> Mixture Treatment Units Homogenizing Ring Conveyance/Distributors Mixture Distributor	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	RTO2	RTO
FORM4B	<u>Forming</u> Press (Molding) Kiln (Slab Curing)	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None
FINISH4	<u>Finishing</u> Cooling Edge Cutting Calibration Polishing Inspection and Packaging	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	N/A	N/A
<b>Process Line L005 VIATERA® III</b>				
PREP5A	<u>Preparation A</u> Grit Hoppers Silica Powder Silos Grit Conveying System Filler Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF43	Baghouse
PREP5B	<u>Preparation B</u> UPA Resin Storage Tanks Daily Resin Service Tanks Resin Weighing Tanks Catalyst Weighing Units	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	RTO3	RTO
MIX5	Mixers Homogenizing Ring Conveyance/Distributors	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	BF43 RTO3	Baghouse RTO
FORM5A	Mixture Treatment Units Mixture Distributor	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	RTO3	RTO
FORM5B	<u>Forming</u> Press (Molding) Kiln (Slab Curing)	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None
FINISH5	<u>Finishing</u> Cooling Edge Cutting Calibration Polishing Inspection and Packaging	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	N/A	N/A
<b>Boilers</b>				
BL001	14.3 Natural Gas fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc	N/A	N/A

Emission Units			Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
BL02	12.277 Natural Gas fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc	N/A	N/A

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

## B. Equipment & Rule Applicability

### Federal Rules

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Boilers BL001 and BL02 are subject to this NSPS based on maximum heat input and date of construction. The boilers are permitted to burn natural gas or distillate fuel oil. The existing NSPS Dc requirement specifying the maximum fuel oil sulfur content weight percent is carried over to Title V Renewal Permit. No other limitations or standards apply.

40 CFR 60 Subpart VVV – Standards of Performance for Polymeric Coating of Supporting Substrates Facilities: The *affected facility* to which the provisions of this NSPS apply is each *coating operation* and any *onsite coating mix preparation equipment* used to prepare coatings for the polymeric coating of supporting substrates for which construction, modification, or reconstruction begins after April 30, 1987.

Table 8 shows the facility processes subject to this rule:

Table 8: NSPS VVV Applicability	
Process Equipment	Note(s)
Line L003 <i>onsite coating mix preparation equipment</i> plus <i>calendering operation</i>	This process component of process line L003 meets the applicability criteria.
Coating Operation #1	No emission standard applies as long as actual and projected VOC usage is less than 95 megagrams (104.72 tpy).
Line L003 roll coaters and associated drying ovens	The Division has determined that the COAT1 operation and subsequent dryers meet the applicability criteria for this NSPS. <sup>2</sup>
Coating Operation #2 (separate from Coating Operation #1)	No emission standard applies as long as actual and projected VOC usage is less than 95 megagrams (104.72 tpy).

### State Rules

Georgia Rule 391-3-1-.02(2)(e): Particulate Emissions from Manufacturing Operations: Each PM emission point other than fuel-burning equipment is subject to this regulation. The applicant should easily comply with this state rule because the applicable emission units will be controlled for PM emissions and thereby emit minor amounts. Table 9 summarizes the existing operational requirements for purposes of providing a reasonable assurance of compliance with this state rule.

<sup>2</sup> U.S. EPA Applicability Determination Index, Control Number 0400037, 8/19/2004, Part 60, VVV, Polymeric Coating of Supporting Substrates.

<b>Table 9: Process Operating Requirements for Compliance with Georgia Rules (e) and (b)</b>		
<b>Line #</b>	<b>Emissions Units</b>	<b>Requirement</b>
L001	Silos, scale hoppers, weighing stations, hoppers and bag dump stations, and mixing stations	Operate the applicable bin vent filter or baghouse at all times of process operation.
L002	Grit hoppers, silos, conveying systems, weighing stations, pigment preparation	Operate the applicable baghouse at all times of process operation.
L003	Mixers	Operate the applicable baghouses at all times of operation of the mixers.
L004	Grit hoppers, silos, conveying systems, weighing stations, pigment preparation	Operate the applicable baghouse at all times of process operation.
L005	Grit hoppers, silos, conveying systems, weighing stations, mixers, homogenizer	Operate the applicable baghouse at all times of process operation.

Georgia Rule 391-3-1-.02(2)(b): Visible Emissions: Each non-fuel burning equipment emission point subject to Georgia Rule 391-3-1-.02(2)(e) is subject to this state rule which limits the opacity to less than or equal to forty (40) percent. Table 9 summarizes the existing operational requirements for purposes of providing a reasonable assurance of compliance with this state rule.

Georgia Rule 391-3-1-.02(2)(III): NOx Emissions from Fuel-Burning Equipment: Boilers BL001 and BL02 are subject to this rule based on maximum heat input, date of construction, and county location. This state rule limits the NOx emissions to 30 ppm on a volume and dry basis at 3% oxygen from May 1 through September 30 of each year.

Georgia Rule 391-3-1-.02(2)(x) – Fabric and Vinyl Coating: Process line L003 is potentially subject to this state rule, however, the potential VOC emissions from this process line are less than 100 tons per year. The potential VOC emissions from this process line are less than 100 tons per year as long as LX maintains the integrity of the permanent total enclosure housing the roll coaters, operates this enclosure in compliance with Method 204, and routes the enclosure exhaust to an RTO. Therefore, the facility is not applicable to this regulation.

### C. Permit Conditions

Table 10 summarizes Section 3 permit conditions.

<b>Table 10: Summary of Section 3 Permit Condition(s)</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
Boilers	3.2.1	<b>No change</b> – Establishes the fuel types that can be combusted in the boilers in order to avoid the emission standards of 40 CFR 63 Subpart JJJJJ.
Applicable Process Equipment	3.2.2	<b>Modified Condition</b> – Establishes the requirement to operate and maintain dust collection devices (e.g., baghouses, bin vent filters) on the specified process operations. This condition was modified in permit Amendment 3028-129-0075-V-05-1 to add the operations of process line L005.
L001, L003	3.2.3	<b>No change</b> – Permanent Total Enclosure Requirement for process operations of Line 001-and L003.
L001	3.2.4	<b>No change</b> - RTO with ID No. OX001 -Establishes the minimum destruction efficiency of MMA rather than “HAPS” because MMA is the only HAP emitted from this line. -Establishes the requirement to exhaust all applicable process emission points to this RTO.
L001	3.2.5	<b>No change</b> - RTO with ID No. OX001 -Establishes the minimum destruction efficiency of VOC. -Establishes the requirement to exhaust all applicable process emission points to this RTO.
L001	3.2.6	<b>No change</b> - RTO with ID No. OX002 -Establishes the minimum destruction efficiency of MMA rather than “HAPS” because MMA is the only HAP emitted from this line. -Establishes the requirement to exhaust all applicable process emission points to this RTO.
L001	3.2.7	<b>No change</b> - RTO with ID No. OX002 -Establishes the minimum destruction efficiency of VOC. -Establishes the requirement to exhaust all applicable process emission points to this RTO.
L001	3.2.8	<b>New Condition from Amendment 3088-129-0075-V-05-4</b> - Carbon Bed Fiter with ID No. CB01 -Establishes the requirement to operate the Carbon Bed Filter at all times the associated equipment operates.

<b>Table 10: Summary of Section 3 Permit Condition(s)</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
L002	3.2.9	<p><b>Modified Condition - RTO with ID No. OX003</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of styrene rather than “HAPS” because styrene is the only HAP emitted from this line.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul> <p>This condition was modified by removing oxidizer ID No. RC001, since it has been removed from the line.</p>
L002	3.2.10	<p><b>Modified Condition - RTO with ID No. OX003</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of VOC.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul> <p>This condition was modified by removing oxidizer ID No. RC001, since it has been removed from the line.</p>
L003	3.2.11	<p><b>No change - RTO with ID No. RTO1</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of <i>total HAPs</i>.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>
L003	3.2.12	<p><b>No change - RTO with ID No. RTO1</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of VOC.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>
L004	3.2.13	<p><b>No change - RTO with ID No. RTO2</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of styrene rather than “HAPS” because styrene is the only HAP emitted from this line.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>
L004	3.2.14	<p><b>No change - RTO with ID No. RTO2</b></p> <ul style="list-style-type: none"> <li>-Establishes the minimum destruction efficiency of VOC.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>
L005	3.2.15	<p><b>New Condition from Permit Amendment 3088-129-0075-V-05-1</b></p> <ul style="list-style-type: none"> <li>- RTO with ID No. RTO3</li> <li>-Establishes the minimum destruction efficiency of styrene rather than “HAPS” because styrene is the only HAP emitted from this line.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>
L005	3.2.16	<p><b>New Condition from Permit Amendment 3088-129-0075-V-05-1</b></p> <ul style="list-style-type: none"> <li>- RTO with ID No. RTO3</li> <li>-Establishes the minimum destruction efficiency of VOC.</li> <li>-Establishes the requirement to exhaust all applicable process emission points to this RTO.</li> </ul>

<b>Table 10: Summary of Section 3 Permit Condition(s)</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
Boilers	3.3.1 3.3.2	<b>No change</b> – NSPS Dc Requirement for the Boilers -40 CFR 60 Subparts A and Dc applicability statements for the boilers remain.
L003	3.3.3	<b>No change</b> – Process Line L003 -40 CFR 60 Subparts A and VVV applicability statements are expanded to include all applicable equipment.
L003	3.3.4	<b>No change</b> – NSPS VVV definition for “VOC used”.
L003	3.3.5	<b>No change</b> – NSPS VVV limit on mass of “VOC used”. Additional requirements apply if and when LX exceeds this limit.
Boilers	3.4.1.a	<b>No change</b> – Boilers -Georgia Rule 391-3-1-.02(2)(d), PM standard
Boilers	3.4.1.b	<b>No change</b> – Boilers -Georgia Rule 391-3-1-.02(2)(d), opacity
Boilers	3.4.2	<b>No change</b> – Boilers -Georgia Rule 391-3-1-.02(2)(III) requirement
Fuel burning sources	3.4.3	<b>No change</b> – Boilers and Ovens -Georgia Rule 391-3-1-.02(2)(g), fuel sulfur content limit
Facility wide	3.4.4	<b>No change</b> – Opacity of emissions per Georgia Rule 391-3-1-.02(2)(b)
Applicable Process Equipment	3.4.5	<b>No change</b> – Georgia Rule 391-3-1-.02(2)(e)
Applicable Process Equipment	3.5.1	<b>No change</b> - Routine maintenance on all air pollution control equipment.
Applicable Equipment	3.5.2	<b>No change</b> – Maintain an inventory of filter bags or bin filter replacements.

#### **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

### FEDERAL REGULATIONS

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: No testing requirements are imposed by NSPS Dc.

40 CFR 60 Subpart VVV – New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities: No testing requirements are imposed by NSPS VVV.

### STATE RULES

Georgia Rule 391-3-1-.02(2)(III): NOx Emissions from Fuel-Burning Equipment: Boilers BL001 and BL02 are subject to this rule based on maximum heat input, age, and county location. No testing requirements are imposed by the Division's *Procedures for Testing and Monitoring Sources of Air Pollutants* based on this state rule.

40 CFR 63 Area Source Classification: LX operates thermal oxidation systems as well as several permanent total enclosure rooms to maintain area source classification under Part 63. LX's existing permit requires re-testing of the destruction removal efficiencies at least once every five years. The Title V Permit establishes the next testing deadline as June 9, 2026, based on information provided by the Stationary Source Compliance Program.

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Permit Conditions:

Table 11 specifies the Permit Conditions in Section 4.

<b>Table 11: Permit Conditions in Section 4</b>		
<b>Applicable Equipment</b>	<b>New Permit Condition No.</b>	<b>Discussion</b>
Facility wide	4.1.1	<b>No change:</b> Standard Georgia Title V template language.
Facility wide	4.1.2	<b>No change:</b> Standard Georgia Title V template language.
Facility wide	4.1.3	<b>No change:</b> Standard Georgia Title V template language.
Facility wide	4.1.4	<b>No change:</b> Standard Georgia Title V template language.
L002	4.2.1	<b>Modified condition:</b> Standard Georgia Title V template language. This condition was modified by removing oxidizer ID No. RC001, since it has been removed from the line.
L001 L002 L003 L004 L005	4.2.2	<b>Updated</b> – Specifies the frequency of conducting performance testing with the next deadline of June 21, 2026, on OX001.
L001 L002 L003 L004 L005	4.2.3	<b>Modified Condition</b> – -Clarified the testing requirement per line per pollutant. Line L005 testing was added to this condition with the addition of conditions 4.2.3.k-l according to Permit Amendment 3088-129-0075-V-05-1. Old conditions 4.2.3g-h were removed because oxidizer RC001 was removed from L005.
L001/L1NEW	4.2.4	<b>New Condition number from Permit Amendment 3088-129-0075-V-05-4</b> This condition was 4.2.6 in Permit Amendment 3088-129-0075-V-05-4. -Performance test for the thermal oxidizer OX002 was conducted on December 6, 2023
L001/L1NEW	4.2.5	<b>New Condition number from Permit Amendment 3088-129-0075-V-05-4</b> This condition was 4.2.7 in Permit Amendment 3088-129-0075-V-05-4. -Performance test for carbon bed filter system CB01 was conducted on December 6, 2023.

## 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

Table 12 summarizes Section 5 permit conditions:

<b>Table 12: Section 5 Permit Conditions</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
L001 L002 L003 L004 L005	5.1.1	<b>No change</b> -Standard Georgia Title V template language
L001	5.2.1.a	<b>No change</b> -RTO with ID No. OX001, combustion zone temperature
L001	5.2.1.b	<b>No change</b> -RTO with ID No. OX002, combustion zone temperature -Updated permit language
L002	5.2.1.c	<b>Modified Condition</b> -RTO with ID No. OX003, combustion zone temperature This condition was modified by removing oxidizer ID No. RC001 as an alternative control device, since it has been removed from the line. Old conditions 5.2.1.d-g were removed because RC001 was removed from the line.
L003	5.2.1.d	<b>No change but relisted because of removal of previous conditions</b> -RTO with ID No. RTO1, combustion zone temperature
	5.2.1.e	<b>No change</b> -Continuously monitor and record the inlet static pressure to RTO with ID No. RTO1 to verify operation of the permanent total enclosure.
L004	5.2.1.f	<b>No change but relisted because of removal of previous conditions</b> -RTO with ID No. RTO2, combustion zone temperature
L005	5.2.1.g	<b>New Condition from Permit Amendment 3088-129-0075-V-05-1</b> -RTO with ID No. RTO3, combustion zone temperature.

<b>Table 12: Section 5 Permit Conditions</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
L001	5.2.2.a	<b>No change</b> –Baghouse pressure drop monitoring for process line L001. This condition was consolidated to one condition for all baghouses in Line L001 in this Renewal Permit.
L002	5.2.2.b	<b>No change</b> –Baghouse pressure drop monitoring for process line L002. This condition was consolidated to one condition for all baghouses in Line L002 in this Renewal Permit.
L003	5.2.2.c	<b>No change</b> –Baghouse pressure drop monitoring for process line L003. This condition was consolidated to one condition for all baghouses in Line L003 in this Renewal Permit.
L004	5.2.2.d	<b>No change</b> –Baghouse pressure drop monitoring for process line L004. This condition was consolidated to one condition for the two baghouses in Line L004 in this Renewal Permit.
L005	5.2.2.e	<b>New Condition from Permit Amendment 3088-129-0075-V-05-1</b> Baghouse BF43 pressure drop monitoring in process line L005
L001/L1NEW	5.2.2.f	<b>New condition added for new bin vent filters from Permit Amendment 3088-129-0075-V-05-4</b> –Bin vent filter pressure drop monitoring
L001	5.2.2.g	<b>No change</b> –Record the fan operating status which pulls flow into RTO with ID No. OX001 and No. OX002.
L001/L1NEW	5.2.2.h	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> –Record the fan operating status which pulls flow into ID No. CB01.
L001 L002 L003 L004 L005	5.2.3	<b>No change</b> Visible emission checks for baghouses.
L001 L002 L003 L004 L005	5.2.4	<b>No change</b> –PMP for baghouses.
Boilers	5.2.5	<b>No change</b> –Monitoring for verifying compliance with Georgia Rule 391-3-1-.02(2)(III).

<b>Table 12: Section 5 Permit Conditions</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
L001	5.2.6	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> –Preventative Maintenance Program for carbon bed filter system with ID No. CB01
L001, L002, L004, L005	5.2.7-5.2.11	List the CAM requirements for the facility.

### C. Compliance Assurance Monitoring (CAM)

The facility operates units that are considered *pollutant specific emission units* (PSEUs) per Part 64 because they are (1) subject to a pollutant emission standard for which there is a control device, and (2) the pre-control potential emission for the pollutant is greater than the major source threshold.

CAM conditions address the selected operating parameters accordingly. PM emissions from baghouses and Bin Ven Filters are subject to CAM because pre-control emissions exceed 100 tpy and controls are used to comply. PM is subject to the emission standard of Georgia Rule (e).

The frequency of data collection under Part 64 depends on whether or not the controlled potential to emit exceed the major source threshold (i.e., whether the PSEU is a large PSEU). A large PSEU requires continuous monitoring while a PSEU that is not classified as large requires monitoring at least once per 24-hour period. The information for the CAM units is summarized below in Table 13. These CAM conditions are new to this TV renewal.

<b>Table 13: Section C (CAM)</b>					
<b>Emission Unit</b>	<b>Pollutant</b>	<b>Control</b>	<b>Potential Emissions (tpy)</b>		<b>Large PSEU?</b>
			<b>Uncontrolled</b>	<b>Controlled</b>	
Dump Hooper (AH101/PH101)	PM	Baghouse BF201	>100	2.12	No
ATH Scale Hooper #1 (AH102)	PM	Bin Vent Filter BF106	>100	13.17	No
ATH Scale Hooper #2 (AH103)	PM	Bin Vent Filter BF107	>100	13.17	No
ATH Storage Silo #1 (AS101)	PM	Bin Vent Filter BF101	>100	0.53	No
ATH Storage Silo #2 (AS102)	PM	Bin Vent Filter BF102	>100	0.53	No
Cutting and Milling Operation (CM001)	PM	Baghouse BF001	>100	7.96	No
Chip Weighing Scale (CW001)	PM	Baghouse BF004	>100	2.12	No
Compound Mixers (CM001/CM002)	PM	Baghouse BF005	>100	2.12	No
PMMA Weigh Hopper #1 (PH102-1)	PM	Bin Vent Filter BF104	>100	4.69	No
PMMA Weigh Hopper #2 (PH102-2)	PM	Bin Vent Filter BF105	>100	4.69	No

<b>Table 13: Section C (CAM)</b>					
<b>Emission Unit</b>	<b>Pollutant</b>	<b>Control</b>	<b>Potential Emissions (tpy)</b>		<b>Large PSEU?</b>
			<b>Uncontrolled</b>	<b>Controlled</b>	
Planer 1 operation (PL001)	PM	Baghouse BF002	>100	6.63	No
Planer 2 operation (PL002)	PM	Baghouse BF006	>100	4.96	No
PMMA Storage Silo (PS101)	PM	Bin Vent Filter BF103	>100	0.53	No
Production Line (L002) (PREP2A/BF301)	PM	Baghouse BF301	>100	14.58	No
Additional Production Line (L002) (PREP2A/BF305)	PM	Baghouse BF305	>100	15.91	No
Production Line (L004) (PREP4A)	PM	Baghouse BF41	>100	31.82	No
Production Line (L005) (PREP5A)	PM	Baghouse BF43	>100	26.52	No

*Other Units Not Subject to CAM*

Bin Vent Filters (BF100, BF109-111) for L1NEW were not included in this CAM plan because the post-controlled potential emissions are below 100 tons/yr (small PSEUSs). The construction and operation of that new line was permitted on September 8, 2023, after the submission of this TV renewal application (January 2023). Those new Bin Vent Filters will be included in the next renewal application.

## 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.

Table 14 summarizes Section 6.1 permit conditions.

Table 14: Section 6.1 Permit Conditions		
Applicable Equipment	Permit Condition No.	Discussion
Facility wide	6.1.1 6.1.2 6.1.3 6.1.4 6.1.5 6.1.6	<b>No change</b> -Standard Georgia Title V template language.
Facility wide	6.1.7a.i.	<b>No change</b> -No excess emission is defined per state rule or federal regulation.
Facility wide	6.1.7b.i.	<b>No change</b> -Standard Georgia Title V template language as it pertains to facility-wide SM limit for HAPs.
L003	6.1.7b.ii.	<b>No change</b> -Standard Georgia Title V template language as it pertains to VOC emissions from Coating Operation #1 per NSPS VVV.
L003	6.1.7.b.iii	<b>No change</b> -Standard Georgia Title V template language as it pertains to VOC emissions from Coating Operation #2 per NSPS VVV.
L001/L1NEW	6.1.7b.iv.	<b>New Condition</b> Defines the exceedance for the carbon filter system that was added in Amendment 3088-129-0075-V-05-4.
L001	6.1.7c.i.	<b>No change</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. OX001: 1566 °F. -Averaging period remains as a 3-hour rolling average.
L001	6.1.7c.ii.	<b>No change</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. OX002: 1566 °F. -Averaging period remains as a 3-hour rolling average.

**Table 14: Section 6.1 Permit Conditions**

<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
L002	6.1.7c.iii	<b>No change</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. OX003, 1524 °F. -Averaging period remains as a 3-hour rolling average.
L003	6.1.7c.iv.	<b>No change</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. RTO1, 1614 °F (879 °C). -Averaging period remains as a 3-hour rolling average.
L004	6.1.7c.v.	<b>No change</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. RTO2, 1519 °F. -Averaging period remains as a 3-hour rolling average.
L005	6.1.7c.vi*	<b>New Condition from Permit Amendment 3088-129-0075-V-05-1</b> -Referenced the temperature from the most recent performance test approved by the Division for RTO with ID No. RTO3, 1500 °F. -Averaging period remains as a 3-hour rolling average
L001	6.1.7c.vii. *	<b>No change</b> -Regarding permanent total enclosure of the line L001 compound mixing room. -SSCP has defined an excursion for operating the compound mixing room during periods when the room exhaust is not being ventilated to RTO with ID No. OX001.
L001	6.1.7c.viii.*	<b>No change</b> -Regarding permanent total enclosure of the line L001 cleaning and additive room. -SSCP has defined an excursion for operating the cleaning and additive room during periods when the room exhaust is not being ventilated to RTO with ID No. OX001.
L001	6.1.7c.ix.*	<b>Updated Condition to add new control equipment from Permit Amendment 3088-129-0075-V-05-4</b> -Regarding permanent total enclosure of the line L001 belt coating/casting operation room. -SSCP has defined an excursion for operating the belt coating/casting room during periods when the room exhaust is not being ventilated to Carbon Bed Filter with ID No. CB01.
L003	6.1.7c.x.*	<b>No change</b> -Regarding permanent total enclosure of the line L003 Coating Operation. -monitor the inlet static pressure in the duct plenum immediately before the RTO with ID No. RTO1.



**Table 14: Section 6.1 Permit Conditions**

<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
Applicable Equipment	6.1.7c.xi.*	<b>No change</b> -Defines an excursion for the baghouses based on visible emissions.
Applicable Equipment	6.1.7c.xii.*	<b>No change</b> -Defines an excursion for the baghouses based on pressure drop.
L001/L005	6.1.7c.xiii.*	<b>No change</b> -Defines an excursion for the bin vent filters based on pressure drop.
CB01	6.1.7d.i	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> - Proposed Preventative Maintenance Program related to the proper operation of the carbon bed filter system.
CB01	6.1.7d.ii	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> -Reporting anytime the regular quarterly media testing is not performed according to condition 4.2.5.
CB01	6.1.7d.iii	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> -Reporting anytime the carbon filter media is not replaced within 15 days of the quarterly testing results indication of replacement.

\*Because of the removal of Old Condition 6.1.7.c.iv, the following conditions were renumbered.

*Conditions removed in this TV-Renewal*

Old Condition 6.1.7.c.iv was removed because oxidizer RC001 was removed from L001 as an alternative control device.

## B. Specific Record Keeping and Reporting Requirements

### FEDERAL REGULATIONS

40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: LX shall record and maintain records of the amount of each fuel combusted in boilers with ID Nos. BL001 and BL02 on a monthly basis.

40 CFR 60 Subpart VVV – New Source Performance Standard for Polymeric Coating of Supporting Substrates Facilities: A VOC usage limit of 95 megagrams (Mg)/yr was included in the current Title V permit.

### STATE RULES

Georgia Rule 391-3-1-.02(2)(III): NO<sub>x</sub> Emissions from Fuel-Burning Equipment: No recordkeeping or reporting requirements apply in addition to those specified in Permit Condition No. 5.2.5.

40 CFR 63 Area Source Classification: The existing recordkeeping and reporting requirements associated with verifying LX's Part 63 area source classification are to maintain a written emission calculation protocol for determining actual emissions of individual and total HAPs emitted from the entire facility on a monthly basis. LX shall incorporate the Division approved test results from Permit Condition No. 4.2.6 in the written calculation protocol (including emission factors). The existing version of the protocol and any subsequent modification to the protocol shall be kept in a permanent form suitable and available for inspection.

As part of permit amendment 3088-129-0075-V-05-4, an exceedance for carbon bed filter source ID No. CB01 is defined as any period in which the carbon filter system is not working for the associated process equipment. An excursion is defined as any departure from the indicators range of the Preventative Maintenance Program and the results of the monitoring of the carbon bed system.

Avoidance of 40 CFR 52.21 for VOC Emissions: Potential VOC emissions (after controls) are less than 250 tons per year from each Title I site. Minimizing the number and frequency of excursions as defined in Permit Condition Nos. 6.1.7c.i-xiii, will provide a reasonable assurance that the facility is operating as a PSD minor source for VOC emissions.

PM, PM<sub>10</sub>, PM<sub>2.5</sub> Emissions: No revision to Condition No. 6.1.7 is necessary for the incorporation of new proposed bin vent filters as Condition No. 6.1.7 is written to reference all applicable bin vent filters.

Permit Conditions:

Table 15 summarizes the Section 6.2 permit conditions.

<b>Table 15: Section 6.2 Permit Conditions</b>		
<b>Applicable Equipment</b>	<b>Permit Condition No.</b>	<b>Discussion</b>
Facility wide	6.2.1	<b>No change</b> –SM Status for HAPs -Referenced approved calculation protocol as the basis going forward. -Maintain monthly records of the parameters used to calculate actual HAP emissions. -Calculate and maintain monthly and consecutive 12-month individual and total HAP emissions from the facility.
	6.2.2	
	6.2.3	
	6.2.4	
Boilers	6.2.5	<b>No change</b> –NSPS Dc recordkeeping requirements.
	6.2.6	
L003	6.2.7	<b>No change</b> – NSPS VVV -Using applicable language from the regulation.
	6.2.8	
	6.2.9	
Facility wide	6.2.10	<b>Updated Condition</b> – Additional Reporting Requirement -No need to report VOC emissions as they are not required to be computed for any regulatory reason. - Addition of Process Line L005 as part of Amendment 3088-129-0075-V-05-1
L001/L1NEW	6.2.11	<b>New Condition from Permit Amendment 3088-129-0075-V-05-4</b> -Additional recordkeeping requirement for the new carbon bed filter system with the weekly Preventative Maintenance Program.

Conditions removed in this TV-Renewal

Conditions 6.2.11 and 6.2.13 from Amendment 3088-129-0075-V-05-1 and 3088-129-0075-V-05-4 were removed because the startup notifications for the new lines were submitted as required.

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

Not Applicable

**B. Alternative Requirements**

Not Applicable

**C. Insignificant Activities**

Refer <https://geos.epd.georgia.gov/ga/geos/public/govent/shared/pages/main/login.aspx>

**D. Temporary Sources**

Not Applicable

**E. Short-Term Activities**

Not Applicable

**F. Compliance Schedule/Progress Reports**

Not Applicable

**G. Emissions Trading**

Not Applicable

**H. Acid Rain Requirements**

Not Applicable

**I. Stratospheric Ozone Protection Requirements**

LX operates air conditioner/refrigeration equipment that used CFC's, HFC's or other stratospheric ozone-depleting substances listed in 40 CFR Part 82, Subpart A, Appendices A and B.

**J. Pollution Prevention**

Not Applicable

**K. Specific Conditions**

Not 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 December 21, 2024, and ended on January 21, 2025. Comments were not received by the Division.