



REGION 4

ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Lee Locke
Environmental Manager
MTI Baths, Inc.
670 North Price Road
Sugar Hill, Georgia 30518
llocke@mtibaths.com

Re: Final Clean Air Act Inspection Report

Dear Lee Locke:

On November 29, 2023, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection of MTI Baths, Inc., located in Sugar Hill, Georgia. Enclosed is a copy of the final report generated by the U.S. Environmental Protection Agency's Region 4, North Air Enforcement Section.

Should you have questions regarding this inspection report, contact me at (404) 562-9177, or by email at Rieck.Stephen@epa.gov.

Sincerely,

STEPHEN
RIECK

Stephen Rieck
Environmental Scientist
North Air Enforcement Section

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STEPHEN RIECK
Date: 2024.01.31 09:21:42
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CC: Jack Habib, Georgia EPD

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Final Inspection Report**

I. GENERAL INFORMATION

Facility Name: MTI Baths, Inc.

Location (Address): 670 North Price Road
Sugar Hill, Georgia 30518

Inspection Date: November 29, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: GA0000001313900155

PERMIT NUMBER: Permit # 3088-135-0170

EPA Region 4 Investigator(s)/Inspector(s):

Steve Rieck, Environmental Scientist
Kevin Taylor, Environmental Engineer
Sharron Porter, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

Jack Habib, Georgia EPD

Person(s) Contacted at Facility (Name and Title):

1. Lee Locke, Environmental Manager
2. Kevin Hyde, Vice President of Operations

Report Prepared by: Stephen Rieck

FACILITY INFORMATION
A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Bathtub Manufacturer
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Permit # 3088-135-0170
3. Air permit issuance date.	November 24, 2020
4. Air permit expiration date.	November 24, 2025
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs) – Styrene
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 C.F.R. Part 63, Subpart WWWW – National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastics Composites Production
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Vents in booths and building
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Fabric Filters

B. Process Description

MTI Baths, Inc., operates a fiberglass-resin reinforced plastic products manufacturing facility. The facility uses resins and other materials subject to 40 C.F.R. Part 63, Subpart WWWW, the NESHAP for reinforced plastic composites production.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 inspection team and the Georgia EPD inspector arrived at the facility on November 29, 2023, at 9:30 AM EST.
2. Credentials presented to facility personnel (include name and title).	Y	Upon arrival, EPA inspectors presented credentials to Lee Locke and Kevin Hyde.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The inspection team held an opening conference with Mr. Locke and Mr. Hyde to discuss inspection objectives.
4. Discussed safety issues.	Y	The inspection team discussed appropriate personal protective equipment prior to going to process areas.
5. Discussed which records to be reviewed.	Y	Facility staff provided the inspection team with records associated with Subpart WWWW compliance. A list of documents reviewed can be found in Item 10 of this report.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	The inspection team discussed the bathtub manufacturing process and facility process areas. All process areas of the facility were inspected during the walk-through.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	The inspection team notified facility staff when photographs were taken during the walk-through. All photographs are considered Confidential Business Information (CBI) until reviewed by facility staff.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Y	The inspection team discussed use of a digital camera.
9. Discussed CBI.	Y	The inspection team indicated that any material claimed to be CBI would be treated in accordance with regulations.

Activity	Yes No NA	Comments
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	Y	The inspection team reviewed facility records on-site. The facility provided electronic copies of records by email following the inspection. Records requested during the inspection: 1. Safety Data Sheets for materials used in the process. 2. Filter changeout logs for all process areas. 3. Filter pressure logs. 4. Monthly production hours. 5. Gel coat and resin usage.
Facility Walk-Through Observations		

Activity	Yes No NA	Comments
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	Inspection of process areas began at approximately 10:00 AM. The inspection started in Building 3, where acrylic tubs are manufactured. Acrylic sheets are heated to 350 degrees Fahrenheit and adhere to the tub mold. After about ten minutes, the shaped acrylic tub is reenforced with spray fiberglass and resin. The tub cures for approximately three hours and is removed from the mold. The tub is then trimmed and assembled with other tub pieces. The process area is equipped with air filters that are changed weekly. No visible emissions were noted. Resin storage tanks are submerged fill and in good condition. The team then observed the engineered solid stone tub manufacturing process. The process uses an auto-caster, which mixes filler material, resins, and a catalyst. The material is poured into a mold and hardened in an oven. No visible emissions were noted in the process area. The team then observed the acrylic shower base manufacturing area in Building 2. This is the only area that uses gel coat in the process. The facility maintains one tank of gel coat. The team also observed the resin storage tank. No visible emissions were noted in the process area.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility operates fabric filters to control particulate matter and improve indoor air quality. No issues were noted with the control device. Pressure drop of the filters is measured and recorded. Filters are changed regularly.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	No visible emissions were observed during the inspection.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	The infrared camera was not used at this facility.

Activity	Yes No NA	Comments
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	A TVA was not used at the facility.
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	A PID was not used at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	The Region 4 inspection team conducted a closing meeting on November 29, 2023, at 11:15 AM EST with Mr. Locke and Mr. Hyde.

Activity	Yes No NA	Comments
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	N/A	Facility staff has reviewed the draft report and determined there was no CBI. Due to a malfunction with the digital camera, pictures taken during the inspection were not saved to the camera's memory card.
31. Discussed observations.	Y	The inspection team thanked facility staff for their time. The team discussed the facility walkthrough.
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 60-day timeframe.
33. Date and time inspection concluded.		The inspection concluded on November 29, 2023, at 11:30 AM EST.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature:

STEPHEN RIECK

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EPA Supervisor Signature & Title:

**JASON
DRESSLER**

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Chief, North Air Enforcement Section