



REGION 4

ATLANTA, GA 30303

February 9, 2024

SENT VIA ELECTRONIC MAIL

Larry Pulliam
President
AGCO, Inc.
2782 Simpson Circle
Norcross, Georgia 30071
lpulliam82@bellsouth.net

Dear Larry Pulliam:

Enclosed is a copy of the final inspection report generated by the U. S. Environmental Protection Agency's Region 4, South Air Enforcement Section, for the inspection conducted at AGCO, Inc., facility, located in Norcross, Georgia on November 29, 2023.

If you have any questions, please contact me at (404) 562-9172, or by email at porter.sharron@epa.gov.

Sincerely,

SHARRON
PORTER
Sharron Porter
Environmental Engineer
South Air Enforcement Section

Digitally signed by
SHARRON PORTER
Date: 2024.02.09
11:11:30 -05'00'

Enclosure

ENCLOSURE

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

I. GENERAL INFORMATION

Facility Name: AGCO, Inc. (AGCO)
Location (Address): 2782 Simpson Circle
Norcross, Georgia 30071

Inspection Date: November 29, 2023

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

ICIS-Air Number: GA00000013500239

EPA Investigator(s)/Inspector(s):

1. Sharron Porter, Environmental Engineer, EPA Region 4
2. Steve Rieck, Environmental Scientist, EPA Region 4
3. Kevin Taylor, Environmental Engineer, EPA Region 4

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

1. Jack Habib, Environmental Engineer
Georgia Environmental Protection Division (Georgia EPD)

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

1. Larry Pulliam, President
2. Matt Pulliam, Vice President, Operations
3. Gary Pulliam, Purchasing Manager

Report Prepared by: Sharron Porter

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Reinforced plastic composites manufacturer of fiberglass and cultured marble products.
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Title V Operating Permit Permit No. 3088-135-0239-V-04-0
3. Air permit issuance date.	11/27/2019
4. Air permit expiration date.	11/27/2024
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Major
6. Major source pollutants (if applicable).	Hazardous Air Pollutants (HAPs) Volatile Organic Compounds (VOCs)
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	HAPS in coatings and resins are emitted during application.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Fabric filters are used in the spraying areas for particulate control.

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

The facility opened during the years of 1982-1983. The overall manufacturing process for AGCO is divided into three areas. The first area handles the manufacturing process for the production of various cultured marble products including vanity tops, tubs, and shower bases. The second area handles the fabrication of fiberglass panels used to adhere to custom shower

bases. The third area handles the manufacturing of various solid surface materials including sheets, bowls, shower pans, and other custom products.

The primary pollutant emitted by the facility is styrene, which is both a volatile organic and hazardous air pollutant. The facility uses open molding operations to manufacture of fiberglass goods. Gelcoat is applied to molds via non-atomized spraying. Polyester resin matrix is then poured into the molds, and the cured products are finished (sanding, grinding, polishing, etc). AGCO operates one staggered shift per day from 6 am - 4 pm, employing 65 employees. AGCO uses the Compliant Materials Option to comply with 40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. AGCO has not made any major modifications or expansions to the process in the last eighteen to twenty-four months.

III. INSPECTION ACTIVITIES

Activity	Yes	Comment
	No	
	NA	
Opening Meeting		
1. Date and time entered the facility.	Yes	The EPA inspectors entered the facility on November 29, 2023, at 12:53 pm (EST).
2. Credentials presented to facility personnel (include name and title).	Yes	Upon arrival, the EPA inspectors presented their EPA credentials to the facility personnel, Larry Pulliam.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	The EPA inspectors held an opening conference with Larry Pulliam, and Jack Habib with the Georgia EPD. Matt Pulliam joined the opening conference later. The purpose and objectives of the inspection were explained during the opening conference. The EPA inspectors pointed out that they were conducting a partial compliance evaluation that was targeting compliance with 40 CFR 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Participants of the opening conference filled

		out an attendance sheet with contact information.
4. Discussed safety issues.	Yes	The EPA inspectors discussed with the facility the personal safety equipment needed to conduct the inspection and any emergency procedures for the facility.
5. Discussed which records to be reviewed.	Yes	The EPA inspectors identified records to be reviewed for the evaluation and provided a listing of those records to the facility. Those records included the following: 1. Weekly inspection of HAP containers during non-use, date, time kept in a log. 2. Monthly usage records of all materials containing VOCs and HAPs. Include material safety data sheets. 3. Facility-wide VOC and HAPs emissions for each month using the usage records. 4. 12-month rolling total facility wide VOC and HAP emissions, based on monthly VOC and HAP emissions calculated. 5. Logs of filter changes 6. Pressure drop across the filter systems. 7. Records on the use of the compliance options used. 8. Notification and reports required by Subpart WWWW. To make the process more efficient, AGCO was given the option of sending the

		information electronically following the inspection.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	The EPA inspectors discussed the overall inspection plan, which was primarily focused on observing the entire fiberglass and cultured marble manufacturing process, from start to finish, with an emphasis on areas where the application of the coatings and resins take place.
7. Discussed facility policy regarding photographs or video (if applicable).	No	N/A
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	No	N/A
9. Discussed CBI.	Yes	The EPA inspectors requested that anything that the facility considers to be CBI be identified. The facility would also have an opportunity to review the EPA inspection report for CBI content prior to finalizing it. Any information identified as CBI would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	Yes	The facility agreed to send the requested records for review to Sharron Porter electronically by emailed as a follow up to the inspection.
Facility Walk-Through Observations		

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.	N/A	The walk-through inspection started at approximately 1:45 pm. AGCO manufacturing process primarily produces cultured marble tubs, sinks, and vanity tops. The walk thru started in the table molds area. The inspection team viewed the manufacturing process for the production of tubs and vanities. Molds (60) are first prepped and then gel-coated. The coated molds are sent through a cure tunnel. The cure tunnel pulls air over the surface of the gel-coated mold, enhancing cure. After the gel-coated molds have cured, they are sent to the mix/pour station. A mixture (matrix) of styrene resin, catalyst, and calcium carbonate is poured into the gel-coated molds and placed on an assembly line for curing. The cured product is removed from the molds. The product is sent to the grind booth for removal of excess matrix and the molds are sent back for reuse. The second area toured was the manufacturing process for the production of fiberglass sheets. In this area, resin and fiberglass are manually applied to molds to produce a single sheet of fiberglass. These sheets of fiberglass are cut and adhered to various custom shower bases. The third area viewed was the manufacturing process for the production of solid surface products. Solid surface molds are prepped and then placed on a conveyor where they wait for the solid surface matrix compound. Matrix is mixed in batch fashion with resin, catalyst, and aluminum trihydrate powder. Once the matrix is mixed, it is poured onto the solid surface molds. After the matrix is cured, the
--	-----	--

		product is removed from the molds and sent to the surface sander and the panel saw. Once the solid surface sheet is finished, it is either shipped to the customer or sent to the automatic casting machine, which is a boutique operations area. The product in this area is all specialty, private label products, cut to customer specifications and the edges are applied using a variety of adhesives. The facility is permitted for five booths, one resin glass booth and four gel coat booths. Two gel coat booths were in operation during the inspection. The gel spray booths are controlled by fabric filters that are changed out every day. Manometers are installed on the fabric filters to monitor the pressure across the filter. Facility personnel at AGCO indicated that filters are changed whenever there is any damage. The pressure drop across Gel Coat Booth 01(EP01) was .18 in WC. The pressure drop across Gel Coat booth 5 (EP05) was .5 (in. WC). However, it was not operating. The Resin Glass Booth (EP04) was not in use and had not been used and in operation since 2010. AGCO does not have any plans to construct Resin Glass Booth EP07. The gel coat used for the spraying process are stored in 55-gallon drums. Resins are stored in 2500 lb totes.
12. The type of process parametric monitoring observed, and the associated value observed (e.g.,	N/A	

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.		
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	
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).	Y	The equipment used for air pollution control are fabric filters for the control of particulates. The filters are changed out daily and have a manometer to record the pressure across the filter. The logs for the fabric filter change outs were reviewed on site.

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.		
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	N/A	

magnitude and duration of emission escaping capture from the hood).		
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).	No	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	There were no emissions which were visible to the naked eye.
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
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/A	
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	
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	

Closing Meeting		
28. Conducted a closing meeting.	Yes	The EPA inspectors conducted a closing meeting on November 29, 2023, at approximately 2:32 pm EST with Larry Pulliam, Matt Pulliam, and Gary Pulliam, representing AGCO, and Jack Habib with the Georgia EPD. The close out meeting was conducted at the facility's main office.
29. Summarize any additional information needed, if applicable?	N/A	
30. Accept a declaration of CBI, if applicable?	No	Although the CBI procedures were explained in the opening meeting and at the start of the inspection. A CBI declaration was not made at the time of the inspection. The facility was advised that an inspection report would be sent to them for a CBI review following the inspection.
31. Discussed observations.	Yes	The EPA inspectors discussed the observations made during the inspection and stated that, although no concerns were noted at the time, a review of the records received still had to be conducted following the onsite portion of the inspection.
32. Discussed next steps, if applicable?	Yes	The EPA inspectors stated that an inspection report would be the next step in the process which would cover observations made during the day of the inspection.
33. Date and time inspection concluded.	Yes	The inspection concluded on November 29, 2023, at approximately 3:00 pm EST.

Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: SHARRON PORTER Digitally signed by SHARRON PORTER
Date: 2024.02.09 11:13:07 -05'00'

EPA Supervisor Signature & Title TODD
GROENDYKE Digitally signed by TODD
GROENDYKE
Date: 2024.02.09 10:46:12 -05'00'

Date Report Finalized: _____

