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May 19, 2009

Ms. Purva Prabhu
Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354

RE: Application No. 17924, dated January 17, 2008
Plant Washington
Sandersville, Georgia
Project No. 6122-07-0007

Dear Ms. Prabhu:

On behalf of our client Power4Georgians, LLC (P4G) please find attached additional supplemental pages for the above referenced application. The attached additional supplemental pages include replacement pages for pages F-28 through F-31 of the recently submitted Exhibit F to correct a typographical error related to the tables shown and referenced on those pages.

If you have any questions, please contact me at (770) 421-3335 or Ken Hiltgen at (770) 421-3334.

Sincerely,
MACTEC ENGINEERING AND CONSULTING, INC.

Justin Fickas
Senior Engineer

Ken Hiltgen
Project Manager/Principal

Cc: C. Dean Alford, Allied

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F.5 Material Handling Systems

Particulate emissions will be generated from material handling systems. In particular, emissions will result from handling systems for coal, limestone, and ash. Section 4.7 of the application addressed BACT for PM emissions from material handling sources. That evaluation would also effectively serve as a BACT evaluation for $PM_{2.5}$ emissions. Emissions of $PM_{2.5}$ from material handling sources would be in a filterable $PM_{2.5}$ only, with no expected emissions of condensable $PM_{2.5}$ (or precursor emissions).

This section addresses material handling (point source) emissions. BACT for PM Emissions from other material handling operations (i.e. coal pile fugitive emissions) was addressed in Section 4.7 of the application. The control strategies indicated for control of fugitive emissions (i.e. water sprays, surfactants, etc.) would also be effective in the control of $PM_{2.5}$ emissions. No information was found regarding more effective control of fugitive $PM_{2.5}$ emissions through use of different crusting agents, watering techniques, etc.

Step 1 – Step 4

BACT for PM for material handling point sources of emissions was determined to be use of a fabric filter baghouse (or cartridge type dust collector for small silo/airflow sources). No economic, energy, or environmental impacts would preclude use of this technology for control of PM for material handling (point source) emissions. Use of these control technologies would also be determined to be BACT for filterable $PM_{2.5}$ emissions.

Step 5 – Selection of BACT

A review of information for the RBLC database found limited data entries for material handling point sources for $PM_{2.5}$ emissions is presented in Table F-14. Most of the entries are for the same source (a steel mill) and are listed as LAER. The $PM_{2.5}$ concentration for all of the units is 0.0022 gr/ft^3. Presumably this was derived from the reported proportions of $PM_{2.5}$ in these waste streams which generally is much lower for this industry.

$PM_{2.5}$ emission estimates for material handling point source emissions were evaluated based on information provided in AP-42. The $PM_{2.5}$ size distribution of for ash handling sources while utilizing a baghouse (53%) was determined from AP-42, Table 1.1-6. The $PM_{2.5}$ size distribution for lime/limestone handling sources (27%) was determined from AP-42, Table 11.17-7. The $PM_{2.5}$ size distribution for coal

material handling point sources (16%) was determined from AP-42, Appendix B.1, Section 11.10. The following Table F-13 indicates the estimated $PM_{2.5}$ emissions from facility material handling (point) sources.

Table F-13 $PM_{2.5}$ Emission Estimates For Material Handling (Point) Sources

Source	Stack ID	$PM_{2.5}$ Emissions (lb/hr)
Crusher House Dust Collector	S40	0.16
Tripper Deck	S41	0.12
Limestone Preparation Building Silo	S42	5.79E-02
Fly Ash Filter Separator (Fly Ash Mechanical Exhausters)	S43	0.05
Fly Ash Silo	S37	0.03
Mercury Sorbent Silo	S38	1.61E-02
SO_3 Sorbent Silo	S36	1.61E-02
Pre-Treatment Soda Ash Silo	S44	8.04E-03
Pre-Treatment Hydrated Lime Silo	S39	2.17E-03
PRB Stackout (Insertable Dust Collector)	S46	1.03E-02
Illinois No. 6 Stackout (Insertable Dust Collector)	S47	1.03E-02
Limestone Stackout (Insertable Dust Collector)	S48	1.74E-02

Prepared by: JDF 5/13/09
Checked by: KDH 5/13/09

In our BACT investigation for the main boiler we found that some fabrics are more effective than others in removing $PM_{2.5}$. In these applications a lack of build up of filter cake (the only detriment to coated bags) is not a concern. **So BACT for filterable $PM_{2.5}$ for material handling (point) sources at Plant Washington is determined to be the use of a fabric filter baghouse (or cartridge type dust collector) as appropriate and the work practice to identify appropriate filter bag types to minimize $PM_{2.5}$ emissions.** $PM_{2.5}$ BACT emission limits are proposed as those lb/hr estimated emission values from Table F-13 above. Although there is no reference method available for measurement of $PM_{2.5}$ emissions, at this time compliance would be proposed to be demonstrated through use of EPA Method 201/201A (including OTM-27) for measurement of filterable $PM_{2.5}$.

Table F-14 RBLC Permit Listings for $PM_{2.5}$ for Material Handling Sources

Facility Name	Facility State	Permit Number	Permit Date	Process Name	Throughput	Throughput Unit	Control Description	Emissions Limit	Emissions Limit Unit
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Coal Grinding (6)	396.84	T/H	Baghouse	1.4[1] (Filterable)	lb/hr
								0.0022[1] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Iron Ore Grinding (6)	992.00	T/H	Baghouse with 2 Cyclones	1.04[1] (Filterable)	lb/hr
								0.0022[1] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Scrap, Coal, Iron Ore Barge Unloading	8250647.00	T/YR	Use of Enclosures, Minimizing Drop Height, Venting Transfer Points to a Baghouse	0.93[2] (Filterable)	lb/hr
								0.0022[2] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Coal and Iron Ore Unloading and Conveying To Storage (3)	Not Indicated	---	Use of Enclosures and a Baghouse	0.93[2] (Filterable)	lb/hr
								0.0022[2] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Conveyors, Hoppers, Screens, to Rotary Hearth Furnace	227.00	T/H	Baghouse	1.40[2] (Filterable)	lb/hr
								0.0022[2] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Alloy, Flux, Carbon, Limestone, Coke Handling (2)	227.00	T/H	Use of Enclosures and a Baghouse	1.40[2] (Filterable)	lb/hr
								0.0022[2] (Filterable)	gr/dscf
New Steel International, Inc. Haverhill	OH	07-00587	5/6/08	Direct Reduced Iron Material Handling	227.00	T/H	Building Enclosure, Enclosures, Baghouse	0.47[2]	lb/hr

[1] Emission limit for Filterable $PM_{2.5}$ is the same as the emission limit for Total PM. Basis for $PM_{2.5}$ emission limits indicated as LAER. Notation indicates; *LIMITS FOR EACH INDIVIDUAL BAGHOUSE. PM10 IS USED AS A SURROGATE FOR PM2.5. FACILITY IS NON-ATTAINMENT FOR PM2.5 AND PSD FOR PM AND PM10*

[2] Emission limit for Filterable $PM_{2.5}$ is the same as the emission limit for Total PM. Basis for $PM_{2.5}$ emission limits indicated as LAER.

Table F-14 RBLC Permit Listings for $PM_{2.5}$ for Material Handling Sources Cont.

Facility Name	Facility State	Permit Number	Permit Date	Process Name	Throughput	Throughput Unit	Control Description	Emissions Limit	Emissions Limit Unit
Atofina Petrochemicals Inc.	TX	07-00587	11/5/01	(2) Powder Masterbatch Weight Bin Vent Filter	Not Indicated	---	None Indicated	0.03 (Filterable)	lb/hr
Arkansas Steel Associates	AR	35-AOP-R3	1/5/01	Slag Processing	Not Indicated	---	Water Application to Control Fugitive Emissions	2.9	lb/hr

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