

Facility Name: **International Marble Industries**

City: Woodstock

County: Cherokee

AIRS #: 04-13-057-00052

Application #: TV-245495

Date Application Received: May 11, 2018

Permit No: 3281-057-0052-V-04-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **International Marble Industries** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. 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: International Marble Industries

2. Parent/Holding Company Name

International Marble Industries

3. Previous and/or Other Name(s)

None

4. Facility Location

304 Bell Park Drive  
Woodstock, Georgia 30188 (Cherokee County)

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

This facility is located within the Atlanta ozone non-attainment area.

**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. 3281-057-0052-V-03-0	November 14, 2013	Title V Renewal

**D. Process Description**

1. SIC Codes(s)

3281

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 manufactures cultured marble tubs, vanities, shower pans, wall panels, trim and window sills.

## 3. Overall Facility Process Description

For each product piece (tub, vanity, etc.) the appropriate mold is selected. The mold is then sprayed with a catalyzed styrene gel coat in one of the Gel Coat Booths. Each coated mold is then placed on a conveyor line which transports it through one of the two gas-fired (0.16 million BTU/hr.) Curing Tunnels, where warm air cures the gel. Once cured, the mold is placed under the resin-casting machine and filled with a mixture of catalyzed polyester resin, marble filler and pigment. Each filled mold is vibrated to release trapped air and to level the material matrix. After being set aside to cure and undergo shrinkage, each piece is removed from the mold and sent to a grinding booth, where it is trimmed and polished with a buffer to remove any imperfections. The finished piece is then ready 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 was a major source for VOC emissions since the Atlanta non-attainment major source threshold decreased from 50 tons per year (tpy) to 25 tpy as non-attainment status changed from serious to severe. The facility had a 50 tpy VOC limit from the original Title V / NSR Avoidance.

Amendment 3281-057-0052-V-01-2 avoided NSR by establishing a 7 tpy limit on Gel Coat Spray Booth No. 2 (EP11) and curing oven tunnel (EP12). International Marble then had 18 "growth" tons per year available ( $25 \text{ tpy} - 7 \text{ tpy} = 18 \text{ tpy}$ ) during the 2003- 2007 NSR 5-year window. The remaining 18 tpy growth (to avoid NSR) was allotted to Gel Coat Spray Booth No. 3 (EP13) in Amendment 3281-057-0052-V-01-3. By limiting emissions to 18 tpy for Gel Coat Spray Booth No. 3, the facility was able to avoid NSR.

On June 18, 2018, Georgia EPD raised the major source threshold for VOC from 25 tpy to 100 tpy. Hence, the facility is not a major source for VOC but is a major source for HAP; therefore, it is considered a Title V major source.

## 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 <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes			✓
CO	Yes			✓
TRS	N/A			
H <sub>2</sub> S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		
Total GHGs	Yes			✓

## 3. MACT Standards

The facility is subject to 40 CFR 63 Subpart WWWW – NESHAP which was promulgated April 26, 2003 and had amendments finalized on August 25, 2005.

## 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:

As discussed in the narrative for the initial Title V Permit, Permit No. 3821-057-0052-V-01-0, the facility is located in the Atlanta ozone nonattainment area which was classified as a “serious” nonattainment area under Title I of the Clean Air Act at the time that this permit was issued. Also at the time that the initial Title V Permit was issued, the VOC emission limit for a major source status was 50 tpy. In order to avoid major source status for VOC, International Marble requested a facility-wide VOC emission limit of 50 tpy.

#### B. Applicable Rules and Regulations

Not applicable

#### C. Compliance Status

There are no facility-wide compliance issues noted with this application.

#### D. Permit Conditions

Condition 2.1.1 limits VOC emission from the facility (excluding Source Codes EP11 and EP13) to 50 tons during any 12 consecutive calendar months. This condition was modified to exclude Gel Coat Spray Booths EP11 and EP13 which were added in later amendments.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

Cultured marble product pieces are manufactured by filling shaped product molds with a mixture of catalyzed polyester resin, calcium carbonate, marble filler and pigment.

Prior to casting, each mold is cleaned in the Cleaning/Prep Area (EP05), then sprayed with a catalyzed styrene gel coat in the Gel Coat Booths (EP03, EP11 and EP13). Particulate overspray from the Gel Coat Booths is controlled by fabric filters (AP01, AP02 and AP04). The maximum processing rate of Gel Coat Booths (EP03, EP11 and EP13) is 2.25 pounds per minute and 3.5 pounds per minute of catalyzed gel coat, respectively. Any imperfections in the molds are repaired in the Hand Lay-up Area (EP09) by manually applying small amounts of gel coat. Each gel-coated mold is placed on a conveyor line which transports it through one of two 0.16 million BTU/hr. gas-fired Curing Tunnels (EP02 and EP12), where warm air partially cures the gel. Then the gel-coated mold is placed under the resin-casting machine and filled with the resin mixture. After being set aside to cure and undergo shrinkage, each piece is removed from the mold and sent to a grinding booth, where it is trimmed and polished with a buffer to remove any imperfections. The finished piece is then ready for shipment.

Marble dust used in the resin mixture is stored in the 250,000 pound-capacity Marble Storage Silo (EP10). Dust emissions from the Marble Storage Silo are controlled by fabric filter baghouse on the bin vent (AP03).

## B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EP01	Resin Storage Tank	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(tt)	2.1.1, 3.3.1, 3.3.4, 6.1.4, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.8 through 6.2.19	None	
EP03	Gel Coat Booth No. 1	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	2.1.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.1.4, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.8 through 6.2.21	AP01	Fabric filter
EP05	Cleaning/Prep Area	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(tt)	2.1.1, 3.3.1, 3.3.2, 6.1.4, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.8 through 6.2.19	None	
EP06	Custom Molding Operations	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(tt)	2.1.1, 3.3.1, 3.3.2, 6.1.4, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.8 through 6.2.19	None	
EP09	Hand Layup Area	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(tt)	2.1.1, 3.3.1, 3.3.2, 6.1.4, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.8 through 6.2.19	None	
EP10	Marble Storage Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2 5.3.1, 5.3.2, 6.1.7	AP03	Fabric filter
EP11	Gel Coat Booth No. 2	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.1.4, 6.1.7, 6.2.1, 6.2.4, 6.2.5, 6.2.8 through 6.2.21	AP02	Fabric filter
EP13	Gel Coat Booth No. 3	40 CFR 63 Subpart WWWW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 6.1.4, 6.1.7, 6.2.1, 6.2.6, 6.2.7, 6.2.8 through 6.2.21	AP04	Fabric filter

- Generally applicable requirements contained in this permit may also apply to emission units listed above.

## C. Equipment & Rule Applicability

As discussed in the initial Title V permit (Permit No. 3281-057-0052-V-01-0), International Marble Industries will continue to be subject to 40 CFR 63 Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." 40 CFR 63 Subpart WWWW applies to facilities engaged in production of reinforced plastic composite products that emit 10 tpy or more of any listed HAP, or 25 tpy or more of combined listed HAP.

40 CFR 63 Subpart WWWW became effective April 21, 2003 and was amended in August 2005. This NESHAP was amended for clarification to sections of the rule. Due to the changes to the NESHAP, Permit No. 3281-057-0052-V-02-0 eliminated the fourth column with the HAP percentage limits because these values were not intended to be absolute HAP content limits. The actual emission limits are the pounds per ton (lb./ton) limits in the third column. If the lb./ton limits in the third column are met, the facility will be in compliance regardless of the HAP content of the resin or gel coat. The lb./ton limits of a particular resin shall be calculated using Equation 1.c.i of Table 1 to 40 CFR 63 Subpart WWWW.

In addition to 40 CFR 63 Subpart WWWW, International Marble Industries is subject to a RACT determination under *Georgia Rule 391-3-1-.02(tt)*, “VOC Emissions from Major Sources” because the facility has the potential to emit 25 tpy or more of VOC emissions. Therefore, the facility is subject to this Georgia Rule (tt) which requires sources to utilize all reasonably available control technology in controlling VOC emissions. Reasonably Available Control Technology means the utilization and/or implementation of water-based or low solvent coatings, VOC control equipment such as incineration, carbon absorption, refrigeration, or other like means as determined by the Director to represent reasonably available control technology for the source category in question. The emissions are composed mainly of styrene, both a HAP and a VOC. As a result, the standards of NESHAP Subpart WWWW were allowed as RACT per Georgia Rule (tt).

When Permit No. 3281-057-0052-V-01-0 was issued, RACT was formed to mirror the anticipated NESHAP WWWW rules at that time. Thus, the HAP % contents were implemented in the permit. However, NESHAP WWWW was amended for clarification to sections of the rule since that permit was issued and the HAP % contents were taken out of the rule to clarify that these values were not intended to be absolute HAP content limits. Therefore, many conditions pertaining to the original RACT were taken out and replaced with conditions that correspond to the amended rule.

Gel Coat Spray Booth EP11 which was added in Permit Amendment No. 3281-057-0052-V-01-2 and Gel Coat Spray Booth EP13 which was added in Permit Amendment No. 3281-057-0052-V-01-3 were included in the requirements for 40 CFR 63 Subpart WWWW.

As discussed in the initial Title V permit (Permit No. 3281-057-0052-V-01-0), the Gel Coat Booths and the Marble Storage Silo are subject to Georgia Rule (b) – Visible Emissions and Georgia Rule (e) – Particulate Emission from Manufacturing Processes. Gel Coat Spray Booth EP11, which was added in Permit Amendment No. 3281-057-0052-V-01-2, and Gel Coat Spray Booth EP13, which was added in Permit Amendment No. 3281-057-0052-V-01-3, are also subject to Georgia Rule (b) and Georgia Rule (e).

As discussed in the initial Title V permit (Permit No. 3281-057-0052-V-01-0), Curing Tunnel Furnace No.1 (EP02) is subject to Georgia Rule (g) – Sulfur Dioxide. Curing Tunnel Furnace No. 2 (EP12) which was added in Permit Amendment No. 3281-057-0052-V-01-2 is also subject to Georgia Rule (g). Because these two Curing Tunnels are subject to only this rule, they were relocated to Attachment B: Generic Emission Groups – Fuel Burning Equipment in this renewal permit.

The facility also noted with this application that there is no Resin Tank EP04. There is only one resin tank. The facility stated that there are no bulk resin storage tanks in use; however, Resin Storage Tank EP01 remains in the permitted equipment in case the facility wants to start using it again. As a result, Resin Tank EP04 will be removed from the equipment list and Resin Storage Tank EP01 will remain in the equipment list. Totes (2,500 lbs.) are used now in place of the resin tank that was taken out of service.

Emission and Operating Caps:

Permit Amendment No. 3281-057-0052-V-01-2 limited the VOC emissions from Gel Coat Spray Booth EP11 to 7 tpy VOC limit in order to avoid NSR requirements.

Permit Amendment No. 3281-057-0052-V-01-3 limited the VOC emissions from Gel Coat Spray Booth EP13 to 18 tpy VOC limit in order to avoid NSR requirements.

#### Rules and Regulations Assessment:

Georgia Rule (b) – Visible Emissions requires that any visible emissions emitted from the facility not equal or exceed forty (40) percent.

Georgia Rule (e) – Particulate Emission from Manufacturing Processes requires that the amount of particulate matter emitted from manufacturing processes not exceed the value calculated using the equation presented in the Rule.

Georgia Rule (g) – Sulfur Dioxide requires that fuel-burning sources with heat input below 100 MMBtu/hr. not burn fuel containing more than 2.5 percent sulfur, by weight.

40 CFR 63 Subpart WWWW requires sources to meet a total HAP emission limit based on a point value system weighted and determined by the facility's method of operation and application methods. Sources regulated under this NESHAP are also subject to work practice standards that include utilizing cleaning solutions that do not contain HAPs and ensuring all HAP-containing storage vessels remain covered.

#### D. Permit Conditions

- Condition 3.2.1 (added in Permit Amendment No. 3281-057-0052-V-01-2) limits the VOC emissions from Gel Coat Spray Booth EP11 to less than 7 tpy in order to avoid NSR for the construction and operation of Gel Coat Spray Booth EP11.
- Condition 3.2.2 (added in Permit Amendment No. 3281-057-0052-V-01-3) limits the VOC emissions from Gel Coat Spray Booth EP13 to less than 18 tpy in order to avoid NSR for the construction and operation of Gel Coat Spray Booth EP13.
- Conditions 3.3.3 through 3.3.4 from the initial Title V permit detail the requirements of 40CFR63 Subpart WWWW. Because of the amended 40CFR63 Subpart WWWW, these conditions were modified in Permit No. 3281-057-0052-V-02-0. As a result of the amended rule, the HAP % contents were removed to clarify that these values were not intended to be absolute HAP content limits.
- Condition 3.4.1 subjects the Gel Coat Booths and Marble Storage Silo to Georgia Rule (b). This condition from the initial Title V permit was modified in Permit Amendment No. 3281-057-0052-V-01-2 to add Gel Coat Spray Booth EP11 and was modified in Permit Amendment No. 3281-057-0052-V-01-3 to add Gel Coat Spray Booth EP13.
- Condition 3.4.2 subjects the Gel Coat Booths and Marble Storage Silo to Georgia Rule (e). This condition from the initial Title V permit was modified in Permit Amendment No. 3281-057-0052-V-01-2 to add Gel Coat Spray Booth EP11 and was modified in Permit Amendment No. 3281-057-0052-V-01-3 to add Gel Coat Spray Booth EP13.



- Condition 3.5.1 requires maintenance for the control equipment.
- Condition 3.5.2 requires replacement filters for the control equipment.
- Condition 3.5.3 requires replacement of gel coat booth filters when static pressure drop falls outside the recommended values.

#### **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 weekly inspection of the bin vent filter for the Marble Storage silo.

Condition 5.2.2 requires installation, calibration and related maintenance on pressure drop monitoring devices for each of the spray booths. Data from these devices is to be recorded daily during operation.

##### **C. Compliance Assurance Monitoring (CAM)**

Not Applicable because the potential precontrolled emissions do not exceed any major source threshold.

## **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.

Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

Condition 6.1.7 was updated to reflect regulatory requirements for reporting pressure drop deviations.

### **B. Specific Record Keeping and Reporting Requirements**

Conditions 6.2.1 and 6.2.2 required the facility to maintain records of materials containing VOCs and/or HAPs and to calculate the VOC emissions from the facility. These conditions were modified in Permit No. 3281-057-0052-V-01-2 to require separate records for Gel Coat Booth EP11 and to exclude this booth from the total VOC emissions from the facility because this booth has its own emission limit. These conditions were modified again in Permit No. 3281-057-0052-V-01-3 to require separate records for Gel Coat Booth EP13 and to also exclude this booth from the total VOC emissions from the facility because this booth has its own emission limit. The language in Condition 6.2.2 was updated in Permit No. 3281-057-0052-V-02-0 to include guidance for the emission calculations and required a notification if any one month exceeded 4.1 tons from the facility (excluding Gel Coat Booths EP11 and EP13).

Condition 6.2.3 requires the facility to notify the Division if any 12 month rolling total of VOC emissions from the facility (excluding Gel Coat Booths EP11 and EP13) exceeds 50 tpy. This condition was modified in Permit No. 3281-057-0052-V-01-3 to also exclude Gel Coat Booth EP13.

Conditions 6.2.4 and 6.2.5 require the facility to calculate the monthly and 12-month rolling total VOC emissions from Gel Coat Booth EP11 and notify the Division if any one month or 12 month rolling total of VOC emissions from Gel Coat Booth EP11 exceeds 0.58 tons during any one month or 7 tpy. Permit No. 3281-057-0052-V-01-3 corrected a typo in this condition.

Conditions 6.2.6 and 6.2.7 require the facility to calculate the monthly and 12-month rolling total VOC emissions from Gel Coat Booth EP13 and notify the Division if any one month or 12 month rolling total of VOC emissions from Gel Coat Booth EP13 exceeds 1.58 tons during any one month or 18 tpy. Permit No. 3281-057-0052-V-01-3 corrected a typo in this condition.

Conditions 6.2.8 through 6.2.18 detail the current requirements to the amendments of 40 CFR 63 Subpart WWWW. These conditions include information concerning HAP content, calculations for different operations and requirements for compliance, notifications, records and reports.

Condition 6.2.19 requires the facility to maintain records of the resin and gel coat usage, VOC content and operation where the resin is used.

Condition 6.2.20 requires a log of the inspections for the filters for the Gel Coat Booths and the Marble Storage Silo.

Condition 6.2.21 requires records of the maintenance performed on the filters for the Gel Coat Booths and the Marble Storage Silo.

## **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**

- Not applicable.

### **E. Short-Term Activities**

- Not applicable.

### **F. Compliance Schedule/Progress Reports**

- The facility is currently operating in compliance with all applicable rules and standards.

### **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.

Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

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.

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 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.//