

Facility Name: **General Mills Operations, Inc**
City: Covington
County: Newton
AIRS #: 04-13-217-00033

Application #: TV-261631
Date Application Received: October 17, 2018
Permit No: 2043-217-0033-V-04-0

Program	Review Engineers	Review Managers
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Toxics	N/A	N/A
Permitting Program Manager		Eric Cornwell

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: General Mills Operations, Inc

2. Parent/Holding Company Name

General Mills Operations, Inc.

3. Previous and/or Other Name(s)

General Mills, Inc.

4. Facility Location

15200 Industrial Park Blvd., NE
Covington, Georgia 30014
(Newton County)

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

The facility is located in an attainment area.

B. Site Determination

General Mills has two main plants which they have designated as the east and west process buildings. The two plant buildings are connected by an enclosed walkway. 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
2043-217-0033-V-03-0	April 24, 2014	Title V renewal.
2043-217-0033-V-03-1	August 26, 2016	Install a new process group (EG07) at the West Plant, a small fryer for quality control purpose and a new diesel-fired emergency generator.
OFF PERMIT	October 19, 2016	Add new dryer and additional cooler segment. Exhaust an existing indoor dust collector (CD8) outside through the roof. Make other changes

		in the process that do not result in emission increases.
OFF PERMIT	June 8, 2017	Reroute the exhaust of an existing vacuum system in the packaging area from indoors to outdoors.
OFF PERMIT	June 9, 2017	Addition of a cyclone to the cooler exhaust and rerouting it outside.
OFF PERMIT	August 3, 2017	Replacement of a fire pump.

D. Process Description

1. SIC Codes(s)

2043

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)

This is a dry cereal and snack manufacturing facility.

3. Overall Facility Process Description

This facility is a dry cereal and snack manufacturing plant. Dry ingredients are unloaded from trucks and railcars and conveyed to storage bins. Ingredients are sifted, cleaned, cut and ground as necessary, then blended to formula and conveyed to cooking equipment. Dough is made in the cookers, conveyed to predryers to adjust the moisture content, and then formed as required for each product. The formed product is heat processed to dry or toast, then cooled as required. Depending on the product being made, a slurry may then be applied and finish dried. Products are then conveyed to the packaging system for packaging in consumer sized packages or filled into intermediate totes. Collected by-products from the process are conveyed to the cereal tailings area. The final products are shipped offsite in trucks.

Process steam is supplied by the three gas-fired boilers with diesel backup. There is a diesel-fired engine for an emergency fire pump and a diesel-fired engine for an emergency power generator.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is not considered a major source under either PSD or NSR regulations. The potential to emit for all pollutants is less than 250 tons per year.

On June 15, 2004, Newton County became a non-attainment area for the 8-hour ozone standard. Facilities located in Newton County having potential nitrogen oxide (NO_x) and/or volatile organic compound (VOC) emissions over 100 tons per year became NSR major sources. For this reason, General Mills took a voluntary limit of 100 tons per year of VOC emissions to remain a minor source under NSR. On July 25, 2017, Newton County was re-designated attainment for the 2008 8-hour ozone standard and is currently in attainment with respect to all ozone NAAQS. Pursuant to GRAQC 391-3-1-.03(8)(c)(14), the major source nonattainment NSR threshold for VOC and NO_x potential emissions is now 100 tpy each for facilities in counties that were in the Atlanta 2008 8-hour ozone nonattainment area, which includes Newton County.

On July 20, 2012, Newton County was designated as a non-attainment area for PM_{2.5}. Facilities located in Newton County having potential emissions of direct PM_{2.5} or sulfur dioxide (SO₂) over 100 tons per year became NSR major sources. Potential emissions of direct PM_{2.5} and SO₂ are less than 100 tons per year so the facility is a minor source under NSR. Newton County was recently re-designated to attainment for PM_{2.5} for the 1997 Annual PM_{2.5} NAAQS and designated attainment for the 2012 Annual PM_{2.5} NAAQS effective February 24, 2016 and October 6, 2016 respectively.

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 ₁₀	Yes	✓		
PM _{2.5}	Yes	✓		
SO ₂	Yes			✓
VOC	Yes			✓
NO _x	Yes			✓
CO	Yes			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	Yes			✓

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
Total HAPs	Yes			✓

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.”

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	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:

The current Title V permit, Permit No. 2043-217-0033-V-02-0, has a facility wide VOC emission cap of 100 tons per year for the purpose of NSR Avoidance. This limit also keeps the facility from being subject to Georgia Rule (tt) - VOC Emissions from Major Sources.

B. Applicable Rules and Regulations

None applicable

C. Compliance Status

The facility has not indicated any non-compliance issues according to latest compliance report on February 2019.

D. Permit Conditions

Condition 2.1.1 limits VOC emissions to 100 tpy to maintain minor source status to keep the facility from being subject to Georgia Rule (tt) and nonattainment NSR. The majority of VOC emissions result from evaporation of flavorings. Emissions of VOC are estimated monthly by General Mills using a mass balance approach to ensure compliance with this condition. Flavoring usages are multiplied by the volatility of the flavorings (determined from the individual flavorings safety data sheet (SDS) and stack testing at other General Mills locations). Similarly, cleaning, sanitation, fumigation, and ink jet printer usages are multiplied by VOC content (determined from SDS).

III. Regulated Equipment Requirements

A. 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
X01	Boiler 30 MMBtu/hr	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 3.3.3, 3.4.2, 3.4.3, 6.1.7, 6.2.1, 6.2.6	None	None
X02	Boiler 30 MMBtu/hr	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 3.3.3, 3.4.2, 3.4.3, 6.1.7, 6.2.1, 6.2.6	None	None
X03	Boiler 30 MMBtu/hr	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	2.1.1, 3.3.3, 3.4.2, 3.4.3, 6.1.7, 6.2.1, 6.2.6	None	None
EG1	Drying/Toasting/Cooling Line 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	C3D1	Baghouses
EG2	Drying/Toasting/Cooling Line 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	C2D3, C2D4	Baghouses
EG3	Drying/Toasting/Cooling Line 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CD6	Baghouses
EG4	Drying/Toasting/Cooling Line 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CD8	Baghouses
EG5	Drying/Toasting/Cooling Line 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CD9	Baghouses
EG6	Production Line 6 (East)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CD11, CD12, CD13	Baghouses
ENG1	Emergency Engines - (one 197 hp diesel-fired emergency fire pump)	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	2.1.1, 3.3.1, 3.3.2, 3.3.4, 3.3.5, 3.3.6, 3.3.8, 3.4.5, 3.4.6, 5.2.4, 5.2.5, 6.1.7, 6.2.1, 6.2.7, 6.2.8, 6.2.9, 6.2.10	None	None
ENG2	Emergency Engine - (One 408 kW or 547 horsepower diesel-fired emergency generator)	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	2.1.1, 3.3.1, 3.3.2, 3.3.4, 3.3.5, 3.3.7, 3.3.8, 3.4.5, 3.4.6, 5.2.4, 5.2.5, 6.1.7, 6.2.1, 6.2.7, 6.2.8, 6.2.9, 6.2.10	None	None
EG7	Cooking./Drying/Cooling Line 7 West Plant	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.4.1, 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CD14	Baghouse

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

B. Equipment & Rule Applicability

Emission and Operating Caps:

The Emergency Engines ENG1 and ENG2 are each limited to 100 hours of operation in order to meet the definition and requirements of an emergency engine in accordance with 40 CFR 63 Subpart ZZZZ.

Rules and Regulations Assessment:

40 CFR 63 Subpart ZZZZ – “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”

The facility is considered an area source of HAPs emissions. However, according to 40 CFR 63.6580 and 6585, a stationary reciprocating internal combustion engine (RICE) located at an area source of HAPs is subject to 40 CFR 63 Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.” Therefore, the emergency generators ENG1 and ENG2 are subject to the applicable requirements of 40 CFR 63 Subpart A “General Provisions” and Subpart ZZZZ.

As defined under 40 CFR 63.6590(a)(2)(iii), both the diesel-fired emergency fire pump (ENG 1) and the diesel-fired emergency generator (ENG 2) are considered new RICE at an area source of HAPs. According to 40 CFR 63.6590(c)(1), a new RICE at an area source meets the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII, for compression ignition engines.

40 CFR 63 Subpart JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”

This regulation applies to industrial, commercial, or institutional boilers as defined in 40 CFR 63.11237 that are located at an area source of hazardous air pollutants (HAP). 40 CFR 63.11195(e) states that gas-fired boilers as defined in this subpart, are not subject to this subpart and to any requirements in this subpart. The definition of a gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Since the Boilers X01, X02, and X03 fire natural gas, this regulation is not applicable.

40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units”

NSPS Subpart Dc applies to steam generating units and process heaters rated between 10 and 100 MMBtu/hr installed after June 9, 1989. NSPS Subpart Dc defines a process heater as “a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.” The three existing boilers (installed May 1988) are not subject to Subpart Dc as the boilers were installed prior to the installation date for applicability.

State Rules:

Georgia Rule (b) - “Visible Emissions”

Rule (b) limits the opacity of emissions from any source that is subject to at least one other emission limitation, to 40 percent, unless a more stringent opacity limit is specified in another regulation. This Rule, therefore, covers all of the sources subject to Georgia Rule (e) and Georgia Rule (g), except for the boilers which are subject to an opacity limit from Georgia Rule (d).

Georgia Rule (d) - "Fuel-burning Equipment"

Rule (d) applies to the Boilers X01, X02, and X03, and limits particulate matter emissions from the boiler according to the following equation:

$$E = 0.5(10/R)^{0.5}$$

where:

E is the allowable emission rate in pounds per million Btu heat input, and

R is the heat input rate in million Btu per hour

This rule also limits opacity to 20 percent except for one six minute period per hour of not more than 27 percent opacity.

Georgia Rule (e) - "Particulate Emission from Manufacturing Processes"

Rule (e) applies to all processes that emit particulate matter and are not covered by a more specific rule or regulation. Rule (e) limits particulate matter according to the following equation:

$$E = 4.1P^{0.67}$$

where:

E is the allowable emission rate in pounds per hour, and

P is the process input weight rate in tons per hour

Georgia Rule (g) - "Sulfur Dioxide"

Rule (g) limits the sulfur content of fuels fired in sources below 100 MMBtu/hr to 2.5 weight percent. The boilers and emergency engines fire propane, natural gas, or No. 2 oil meeting ASTM D396 specifications so compliance with this rule is expected.

Georgia Rule 391-3-1-.02(2)(mmm) NOx Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity

This regulation applies to gas turbines and stationary engines located in the listed counties and specifies NOx emission limits for such sources. General Mills is located in Newton County, a listed county. According to Georgia Rule 391-3-1-.02(2)(mmm)7, emergency generators, as defined by the rule, are not subject to the emission limits included in this regulation. Per the regulation, an emergency stationary engine operates only when electric power from the local utility is not available and which operates less than 200 hours per year. Therefore, the Emergency Engines ENG1 and ENG2 are not subject to the emission limits of this regulation. Compliance with the 200 hour per year operating limit is expected since the emergency engines are subject to the more stringent limit of 100 hours per year in accordance with 40 CFR 63 Subpart ZZZZ.

C. Permit Conditions

Condition 3.3.1 establishes the applicability of 40 CFR 60 Subpart IIII to the Emergency Engines ENG1 and ENG2. Old Conditions 3.3.1 and 3.3.5 were removed as ENG1 and ENG2 are considered as new stationary RICE under NESHAP Subpart ZZZZ and satisfy the requirements of NESHAP Subpart ZZZZ by complying with the NSPS Subpart IIII requirements.

Condition 3.3.2 establishes the applicability of 40 CFR 63 Subpart ZZZZ to the Emergency Engines ENG1 and ENG2. Old Conditions 3.3.2 and 3.3.6 were removed as ENG1 and ENG2 are considered as new stationary RICE under NESHAP Subpart ZZZZ and satisfy the requirements of NESHAP Subpart ZZZZ by complying with the NSPS Subpart IIII requirements.

Condition 3.3.3 (previously Condition 3.3.4) limits the type of fuel used in the Boilers X01, X02, and X03 for avoidance of 40 CFR 63 Subpart JJJJJ.

Condition 3.3.4 contains visible emissions limitations for emergency engines ENG1 and ENG2. Old Condition 3.3.9 was revised into Condition 3.3.4 to incorporate both emergency engines.

Condition 3.3.5 contains diesel fuel requirements for emergency engines ENG1 and ENG2. Old Condition 3.3.10 was revised into Condition 3.3.5 to incorporate both emergency engines.

New Conditions 3.3.6 and 3.3.7 contains NSPS IIII emission standards for emergency engines ENG1 and ENG2 respectively. Condition 3.3.6 was added in response to information from the permit application. Condition 3.3.7 was revised from Old Condition 3.3.11 in accordance with new information from the permit application.

New Condition 3.3.8 contains limitations for non-emergency service time for emergency engines ENG1 and ENG2.

Old Conditions 3.3.3, 3.3.7, and 3.3.8 are removed from the permit and was replaced by Condition 5.2.6.

Conditions 3.4.1 through 3.4.4 contain requirements of Georgia Rules (b), (d), and (e). These conditions limit the opacity and PM emissions from relevant facility emission sources.

Condition 3.4.5 requires that fuel oil burned in the emergency engines meets ASTM specifications.

Condition 3.4.6, Georgia Rule (mmm), limits operation of each emergency engine to less than 200 hours. As an emergency standby stationary engine, these engines are not required to meet the emission limits of Georgia Rule (mmm).

Condition 3.5.1 requires all baghouses, cyclones and scrubbers to operate at all times that the associated sources are in operation.

Condition 3.5.2 requires that an adequate supply of replacement bags be kept on hand for all of the baghouses.

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

Old Condition 4.2.1 contains testing requirements for non-certified engines. As the facility has no non-certified engines at the present, this condition was removed.

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 measuring the pressure differential across each baghouse, for each week it is operated.

Condition 5.2.2 requires that the baghouses be checked on a daily basis for visible emissions. Baghouses that exhaust inside the manufacturing building are exempt from this condition.

Condition 5.2.3 requires that the facility maintain the Preventive Maintenance Program developed for the baghouses. This plan is to include the normal pressure drop ranges for the various baghouses, as well as records of weekly checks of the baghouses and conveying systems for blockages and the bag cleaning mechanisms to ensure proper operation.

Old Condition 5.2.4 required the establishment of normal operating water supply flow rates to the scrubbers. This condition has been removed along with the removal of Scrubbers C1D2 and C1D3 on the facility emission units list in Section 3.1 as the facility stated that the scrubbers are used for the purpose of fire safety and not emission control. Stack testing was performed on two similar scrubbers (C1D1 and C2D1) which were operated in a similar way as the Scrubbers C1D2 and C1D3. Scrubbers C1D1 and C2D1 were removed from the permit as they were originally constructed for fire protection.

New Condition 5.2.4 requires the installation of a non-resettable hour meter on each emergency engine to record operating hours in accordance with 40 CFR 63 Subpart ZZZZ. This Condition combines Old Conditions 5.2.5 and 5.2.6 to incorporate both emergency engines.

New Condition 5.2.5 requires the Emergency Engines ENG1 and ENG2 be operated and maintained according to the manufacturer's written instructions. This Condition replaces old Conditions 3.3.3, 3.3.7, and 3.3.8.

C. Compliance Assurance Monitoring (CAM)

Not Applicable.

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.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires fuel supplier certifications that the fuel oil meets the specifications for No. 2 fuel oil as defined in ASTM D396 (Standard Specifications for Fuel Oils).

Conditions 6.2.2 through 6.2.4 require monthly processing and usage records for all materials containing volatile organic compounds. The facility must calculate a rolling 12 month total of emissions.

Condition 6.2.5 requires the facility to notify the Division should monthly VOC emission limit of 8.33 tons is exceeded. The majority of VOC emissions result from evaporation of flavorings. Emissions of VOC are estimated monthly by General Mills using a mass balance approach to ensure compliance with this condition. Flavoring usages are multiplied by the volatility of the flavorings (determined from the individual flavorings safety data sheet (SDS) and stack testing at other General Mills locations). Similarly, cleaning, sanitation, fumigation, and ink jet printer usages are multiplied by VOC content (determined from SDS).

Condition 6.2.6 requires the facility to keep records of fuel oil usage for Boilers X01, X02, and X03.

Condition 6.2.7 requires the facility to maintain records of the maintenance done on Emergency Engines ENG1 and EN2. This Condition combines Old Conditions 6.2.7 and 6.2.10 to incorporate both emergency engines.

Conditions 6.2.8 and 6.2.9 requires the facility to maintain monthly records of the hours of operation and non-emergency operating hours of the Emergency Engines ENG1 and ENG2. Condition 6.2.8 combines Old Conditions 6.2.8 and 6.2.11 to incorporate both emergency engines. Condition 6.2.9 combines Old Conditions 6.2.9 and 6.2.12 to incorporate both emergency engines.

Condition 6.2.10 (Old Condition 6.2.14) requires the facility to maintain records of the type of fuel consumed in the Emergency Engines ENG1 and ENG2.

Old Condition 6.2.13 was removed as the initial notification requirement was fulfilled.

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

- Not applicable

B. Alternative Requirements

- Not 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

- Short term activities are listed on GEOS website (Section C.4.) and include fumigation and insecticide applications.

F. Compliance Schedule/Progress Reports

- The facility is considered to be in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

G. Emissions Trading

- Not applicable

H. Acid Rain Requirements

- Not applicable

I. Stratospheric Ozone Protection Requirements

- The facility has indicated that they are subject to Title VI, Subpart F of 40 CFR, Part 82 and that either air conditioners or refrigeration equipment which use CFCs, HFCs or other stratospheric ozone-depleting substances and in a charge of greater than 50 pounds.

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 month day, year and ended on month day, year. Comments were/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.//