



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: PCS Nitrogen Fertilizer L.P. – Augusta Plant

Facility Address: 1460 Columbia Nitrogen Drive
Augusta, Georgia 30901, Richmond County

Mailing Address: P.O. Box 1483
Augusta, Georgia 30903

Parent/Holding Company: PotashCorp

Facility AIRS Number: 04-13-245-00002

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Replacement of the PSD avoidance particulate matter (PM) emission rate limit of 0.29 lb/ton urea prill produced with an equivalent PM emission limit of 68.7 tons per year from the C002 Urea Plant Prill Tower (Source Code U201) and the addition of recordkeeping to demonstrate compliance with the annual limit.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2873-245-0002-V-03-0. Unless modified or revoked, this Amendment expires simultaneously with Permit No. 2873-245-0002-V-03-0. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. 46309 dated April 19, 2017; any other applications upon which this Amendment or Permit No. 2873-245-0002-V-03-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

Replacement of the PSD avoidance PM emission rate limit of 0.29 lb/ton urea prill produced with an equivalent PM emission limit of 68.7 tons per year from the C002 Urea Plant Prill Tower (Source Code U201). PM stack testing frequency for the C002 Urea Plant Prill Tower (Source Code U201) was increased to once every twelve (12) months. New recordkeeping conditions were added in order to demonstrate compliance on a rolling twelve month basis. There are no physical changes being made to the equipment as a result of this permit amendment.

Title V Permit Amendment

PCS Nitrogen Fertilizer L.P. – Augusta Plant

Permit No.: 2873-245-0002-V-03-6

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.6 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
U201	C002 Urea Plant Prill Tower	391-3-1-.02-(2)(b) 391-3-1-.02-(2)(e) 40 CFR 63, Subpart FFFF ^{G2}	3.2.14, 3.2.20, 3.3.6, 3.3.7, 3.4.7, 3.4.8, 4.2.1, 4.2.4, 4.2.5, 5.2.2, 5.2.3, 6.1.7, 6.2.15, 6.2.18, and 6.2.19, 6.2.34, 6.2.35, 6.2.36*	None	None

* 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.

^{G2} Group 2 source under 40 CFR 63, Subpart FFFF.

3.2 Equipment Emission Caps and Operating Limits

[MODIFIED CONDITION]

3.2.15 [Reserved]

[NEW CONDITION]

3.2.20 The Permittee shall not discharge, or cause the discharge into the atmosphere, from the C002 Urea Plant Prill Tower (Source Code U201), PM emissions in excess of 68.7 tons during any twelve consecutive months, as determined in accordance with Condition 6.2.36.
[PSD Avoidance - 40 CFR Part 52.21]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

[MODIFIED CONDITION]

- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

[a. through d. – No changes.]

- e. Method 5 and Method 202 for the determination of PM emissions for Rule 391-3-1-.02(2)(e) purposes,

[f. through n. – No changes.]

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.2 Specific Testing Requirements

[MODIFIED CONDITION]

- 4.2.4 The Permittee shall conduct or cause to be conducted on the C002 Urea Plant Prill Tower (Source Code U201) a performance test for emissions of PM once every year. Each test must be conducted approximately twelve (12) months after the previous test. The performance test shall be conducted at the maximum production rate expected for the coming year and related emission points shall be done simultaneously. If production rate exceeds the rate at which the facility was tested by more than ten (10) percent, the Permittee shall retest the facility at the higher rate within 60 days of the rate increase.

[Avoidance of 40 CFR Part 52.21 and 391-3-1-.02(2)(e)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. – No Changes]

- [b.] Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

i. through x. – No Changes

[NEW PARAGRAPH]

- xi. For the C002 Urea Plant Prill Tower, any consecutive twelve (12) month period during which PM emissions, as calculated in accordance with Condition No. 6.2.36, exceed 68.7 tons.

[Avoidance of 40 CFR Part 52.21]

[c. – No Changes]

6.2 Specific Record Keeping and Reporting Requirements

[NEW CONDITION]

- 6.2.34 The Permittee shall maintain daily records of the tons of urea prill produced through operation of the C002 Urea Plant Prill Tower (Source Code U201).
[PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]

[NEW CONDITION]

- 6.2.35 The Permittee shall use the records required by Condition 6.2.34, and the results of the most recent Division-approved performance tests, to calculate and record the monthly PM emissions from the C002 Urea Plant Prill Tower (Source Code U201) for each calendar month, using the following equation:
[PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]

$$E = EF \times P$$

Where:

- E = PM emissions from the C002 Urea Plant Prill Tower (Source Code U201), in pounds per month
EF = the average short-term PM emissions from the C002 Urea Plant Prill Tower (Source Code U201) as established during the most recent performance test, in pounds per ton urea prill produced (which shall be the average of the emission rate during that test, unless otherwise specified by the Division)
P = the total tons of urea prill produced through the C002 Urea Plant Prill Tower (Source Code U201) determined in accordance with Condition 6.2.34, during each calendar month

[NEW CONDITION]

- 6.2.36 The Permittee shall use the monthly PM emission rates, calculated as per Condition 6.2.35, to calculate the rolling 12-month total PM emissions from the C002 Urea Plant Prill Tower (Source Code U201) for each calendar month. The Permittee shall notify the Division, in writing, if PM emissions from the C002 Urea Plant Prill Tower (Source Code U201) exceed 5.7 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the facility intends to maintain compliance with the emission limitations specified in Condition 3.2.20.
[PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]