

## **NARRATIVE**

TO: Hamid Yavari  
FROM: S. Ganapathy  
DATE: July 7, 2023

Facility Name: **House-Autry Mills Inc.**  
AIRS No.: 199-00032  
Location: Hogansville, GA (Meriwether County)  
Application #: 28901  
Date of Application: May 30, 2023

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### **Background Information**

House Autry Mills submitted a SIP Permit Application (assigned Application No. 28901) for construction and operation of a dry mix food processing facility producing wheat and corn flour products. Corn and Wheat flour are trucked to the facility and stored in silos. The corn and wheat flour are mixed with additional ingredients and packaged and shipped to customers from the facility. The facility will have three silos for storing wheat and corn flour. PM emissions from the silos are controlled using silo top cartridge bin vent filters. The bulk meal is then blown into Ribbon blenders. From the ribbon blenders the wheat and corn flour products go to the packaging line where the product is packaged for shipment to customers. A public advisory was issued for this permit application. The draft permit and narrative will be public noticed as well.

### **Purpose of Application**

The Permittee has requested a synthetic minor permit to construct and operate the facility. PM is the only pollutant emitted from the facility operations.

### **Emissions Summary**

PM, PM<sub>10</sub> and PM<sub>2.5</sub> are the only pollutants emitted from the facility. Uncontrolled emissions from the facility are greater than the Title V major source threshold of 100 tons per year. However, controlled PM emissions are estimated at around 6 tons per year.

### **Regulatory Applicability**

This facility will be a minor source under the PSD regulations because it is not one of the 28 named source categories under PSD and potential emissions are not greater than 250 tpy. The facility is a Synthetic Minor source with respect to Title V for PM since potential PM emissions are limited to 99 tons per year.

*Georgia Rule 391-3-1-.02 (2)(b) – “Visible Emissions”*

Rule (b) “Visible Emissions” limits visible emissions from any direct source of emissions to no more than 40% opacity. Rule (b) applies to this facility. All three silos at the facility are equipped with bin vent filter to control PM during filling of the silos. The packaging plant PM emissions are controlled using a baghouse for PM control. The facility should easily comply with the 40% opacity limit of this rule.

*Georgia Rule 391-3-1-.02 (2)(n) – “Fugitive Dust”*

Rule (n) prohibits fugitive dust emissions from equaling or exceeding 20% opacity. Dust mitigation measures adopted at the facility should control fugitive dust emissions from unpaved roads at the facility.

*40 CFR 63 Subpart DDDDDDD - National Emission Standards for Hazardous Air Pollutants for Area Sources: Prepared Feeds Manufacturing*

The facility is not subject to this subpart since the facility is not a prepared feed manufacturing facility that uses a material containing chromium or manganese.

40 CFR 60 Subpart DD, “Standards of Performance for Grain Elevators” The facility is not subject to this NSPS since the permanent storage capacity in the three silos at the facility is less than 1 million bushels.

**Permit Conditions**

Condition 2.1 is the 40% opacity limit for emissions from the silos and the packaging plant per Georgia Rule (b). Since the silos and the packaging plant are PM controlled via bin vents and a baghouse, compliance with this opacity limit is assured.

Condition 2.2 is the PM emission limit per Georgia Rule (e) based on process weight rate. This rule might apply to the operations at the packaging plant. Since PM emissions from the packaging plant are controlled using a baghouse, compliance with this limit is assured.

Condition 3.1 is the standard fugitive emission condition and lists some steps that can be adopted for limiting fugitive emissions from the proposed facility. This condition also specifies the 20% fugitive emissions opacity limit per Georgia Rule (n)2.

Conditions 4.1 and 4.2 are the standard process and control equipment conditions. Condition 4.2 requires the Permittee to maintain an adequate supply of baghouse filter bags to promptly replace any defective baghouse by monitoring the pressure drop across the baghouse.

Condition 5.1 is the standard monitoring condition in most SIP Permits.

Condition 5.2 requires monitoring of the pressure drop across the packaging facility baghouse.

Condition 5.3 requires the Permittee to do weekly Operation & Maintenance checks on the packaging plant baghouse.

Condition 5.4 requires daily visible emissions (VE) checks on the baghouse emissions when the packaging plant is in operation.

Condition 6.1 is the standard performance test condition.

Condition 7.1 requires the Permittee to submit a startup notification to EPD within 15 days of the plant startup.

Condition 7.2 requires records to be maintained for 5 years.

Condition 7.3 requires records of startup, shutdown, or malfunction to be maintained in the facility operations logbook.

Condition 7.4 describes the need to keep records of all malfunctions of pollution control equipment that last more than four hours and the need to report the malfunction.

Condition 7.5 is also recordkeeping condition.

Condition 7.6 requires submission of semi-annual VE excursion reports required by Condition 5.4.

Condition 8.2 requires the Permittee to pay annually the Synthetic Minor permit fees to EPD as per the "Procedures for Calculating Air Permit Application & Annual Permit Fees."

Condition 8.3 requires the Permittee to keep the facilities current air quality permit and all amendments to the permit at the site.

### **Summary & Recommendations**

I recommend that Air Quality Permit No. 2041-199-0032-S-01-0 be issued to House-Autry Mills, Inc. for construction and operation of a dry mix food processing facility producing wheat and corn flour products. PM is the only pollutant emitted from the facility. All storage silos and the packaging plant PM emissions are controlled using bin vent filters and a baghouse. The public advisory issued for this permit application did not generate any comments. The draft permit amendment and narrative were public noticed. EPD's Stationary Source Compliance Program will be in charge of facility inspections and overall compliance oversight.