Facility Name: **GATX-Waycross**
City: Waycross
County: Ware
AIRS #: 04-13-299-00015

Application #: TV-66472
Date Application Received: January 16, 2018
Permit No: 4741-299-0015-V-04-0

Program	Review Engineers	Review Managers
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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: GATX-Waycross

2. Parent/Holding Company Name

General American Transportation Corporation

3. Previous and/or Other Name(s)

The facility is also known as GATX and GATC.

4. Facility Location

The facility is located at 2610 Industrial Boulevard, in Waycross, (Ware County), Georgia.

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

The facility is located in Ware County, outside of the 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
4741-299-0015-V-03-0	7/18/2013	Title V renewal
Off-Permit Change	1/10/2015	The installation of two new process heaters
4741-299-0015-V-03-1	6/1/2015	The Installation of second flare (C28) to the pressurized flammable gas purge system (0017).
Off-Permit Change	1/18/2016	The installation of two new process heaters.
4741-299-0015-V-03-2	5/26/2017	The replacement of existing tankcar cleaning operations (ID No. 0016) and associated control devices, and the replacement of an existing 7.3 MMBtu/hr natural gas-fired boiler with three new 11.5 MMBtu/hr natural gas-fired boilers (ID Nos. B001, B002, and B003).

D. Process Description

1. SIC Codes(s)

SIC code: 4741

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 cleans and refurbishes leased railcars.

3. Overall Facility Process Description

The facility consists of several independent processes: railcar cleaning operations, interior lining operations, and exterior coating operations.

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 is a potential major source for PSD review, but has taken a VOC limit of 112 tons per year in order to remain a minor source for the avoidance of PSD review and to minimize emissions fees for the source without disrupting current and expected operational levels.

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	✓			✓
PM_{10}	✓			✓

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
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓			✓
CO	✓			✓
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The facility is subject to 40 CFR Part 63, Subpart MMMM – "*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products."*

The facility is subject to 40 CFR Part 63, Subpart ZZZZ – "*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines,"*

The facility is subject to 40 CFR Part 63, Subpart DDDDD—"*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*"

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:

The facility is limited to 112 tons per year of volatile organic compound (VOC) emissions.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

No noncompliance issues currently exist.

D. Permit Conditions

Permit Condition 2.1.1 limits the facility wide VOC emissions to 112 tpy.

III. Regulated Equipment Requirements

A. Equipment List for the Process

The facility will install a new Tankcar Cleaning operation (Source ID No. 0016-new), and add two new Venturi Scrubber (Control Device Nos. C16a-new and C16c) and two new Carbon Adsorber (Control Device Nos. C16b-new and C16d). The existing tankcar cleaning rack 0016-old and associated control devices C16a-old and C16b-old will be shut down as part of the tankcar cleaning rack replacement project (Permit Amendment No. 4741-299-0015-V-03-2.

Emission Units		**Specific Limitations/Requirements**		**Air Pollution Control Devices**	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
0009	Exterior Painting Operation	40 CFR Part 63 Subpart MMMM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.4, 5.2.8, 5.2.10, 5.2.12, 6.2.1 thru 6.2.4, 6.2.5, 6.2.7 thru 6.2.17	C9	Fabric Filters
0013	Interior Painting/Lining Operation	40 CFR Part 63, Subpart MMMM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 6.2.1 thru 6.2.4, 6.2.7 thru 6.2.17	C13	Fabric Filters
0016-0ld	Tankcar Cleaning (old)	Toxic Guideline	2.1.1, 3.2.1, 3.2.2, 3.5.2, 3.5.3, 3.5.12, 5.2.1, 5.2.2, 5.2.3, 6.2.2, 6.2.3, 6.2.26	C16a-old	Venturi Scrubber
				C16b-old	Carbon Adsorber
0016-new*	Tankcar Cleaning (new)	Toxic Guideline	2.1.1, 3.2.1, 3.2.2, 3.5.2, 3.5.3, 3.5.12, 5.2.1, 5.2.2, 5.2.3, 6.2.2, 6.2.3, 6.2.26	**C16a-new***	Venturi Scrubber
				C16b-new*	Carbon Adsorber
			2.1.1, 3.2.1, 3.2.2, 3.5.3, 3.5.11, 3.5.12, 5.2.1, 5.2.2, 5.2.3, 6.2.2, 6.2.3, 6.2.26	**C16c***	Venturi Scrubber
				C16d*	Carbon Adsorber
0017	Pressurized Flammable Gas Purge System	Toxic Guideline	2.1.1, 3.2.1, 3.5.4, 3.5.5, 3.5.6, 3.5.7, 3.5.8, 5.2.4, 5.2.5, 5.2.6, 6.2.2, 6.2.3	C17 C28	Flare
0019	Flammable Commodities Purge System	Toxic Guideline, 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 60, Subpart JJJJ	2.1.1, 3.2.1, 3.3.3, 3.3.4, 3.3.5, 3.5.9, 4.2.1, 4.2.2, 4.2.3, 5.2.7, 6.2.2, 6.2.3, 6.2.18, 6.2.19	C19	I.C. Engine
				C24	I.C. Engine
				C25	I.C. Engine
0020	Small Parts Painting and Touchup	40 CFR Part 63, Subpart MMMM 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1, 3.4.2, 3.5.1, 5.2.8, 6.2.1 thru 6.2.4, 6.2.5, 6.2.7 thru 6.2.17	C20	Fabric Filter
0008	Exterior Blasting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	3.4.1, 3.4.2, 3.5.10, 5.2.4, 5.2.8, 5.2.10, 5.2.11, 6.2.5	C8	Baghouse
0011	Interior Blasting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	3.4.1, 3.4.2, 3.5.10, 5.2.4, 5.2.8, 5.2.10, 5.2.11, 6.2.5	C11	Baghouse
0022	Interior Blasting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.10, 5.2.4, 5.2.8, 5.2.9, 6.2.5, 6.2.6	C22	Baghouse
0023	Solvent Still			None	N/A
0026	Interior Blasting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.10, 5.2.4, 5.2.8, 5.2.9, 6.2.6	C26	Baghouse
0027	Interior Blasting	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.10, 5.2.4, 5.2.8, 5.2.9, 6.2.6	C27	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
B001	11.5 MMBtu/hr natural gas/propane fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD	2.1.1, 3.3.6, 3.3.7, 3.3.8, 3.4.3, 3.4.4, 3.4.5, 5.2.4, 5.2.13, 6.2.1, 6.2.20 through 6.2.25	n/a	n/a
B002	11.5 MMBtu/hr natural gas/propane fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD	2.1.1, 3.3.6, 3.3.7, 3.3.8, 3.4.3, 3.4.4, 3.4.5, 5.2.4, 5.2.13, 6.2.1, 6.2.20 through 6.2.25	n/a	n/a
B003	11.5 MMBtu/hr natural gas/propane fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD	2.1.1, 3.3.6, 3.3.7, 3.3.8, 3.4.3, 3.4.4, 3.4.5, 5.2.4, 5.2.13, 6.2.1, 6.2.20 through 6.2.25	n/a	n/a

* 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.

*****Proposed in Permit Amendment No. 4741-299-0015-V-03-2. The existing tankcar cleaning rack 0016-old and associated control devices C16a-old and C16b-old will be shut down as part of the tankcar cleaning rack replacement project (Permit Amendment No. 4741-299-0015-V-03-2.

B. Equipment & Rule Applicability

Emission and Operating Caps:

In order to comply with the Toxic Guidelines, the following operating caps have been added to the permit:

Tank car cleaning operations are limited to one tank car per consecutive 24-hour period for the following commodities: Bromine, Methyl Chlorosilanes, Methyl Dichlorosilanes, Methyl Trichlorosilanes, Trichlorosilanes, Methyl Isocyanate, Methylene Diisocyanate, Nitrosyl Chloride, Benzene, Chloroform, Methyl Bromide, Hydrogen Bromide, and Hydrogen Chloride

Cleaning tank cars containing chlorine is limited to 2 tank cars during any consecutive 24-hour period.

Rules and Regulations Assessment:

Georgia Rule 3-91-3-1-.02(2)(b) applies to all sources that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard.

Georgia Rule 3-91-3-1-.02(2)(e) applies to all manufacturing processes with particulate matter emissions.

Georgia Rules 391-3-1-.02(2)(d) applies to the boilers.

Georgia Rules 391-3-1-.02(2)(g) applies to the boilers.

In order to maintain compliance with these standards, the facility will be required to perform visual checks for the exterior and interior painting filters (ID Nos. C9, C13, and C20) on a weekly basis.

The baghouse filters (ID Nos. C8, C11, C22, C26, and C27) will be changed any time the pressure drop across the filter system falls outside the range of 2 to 8 inches of water. The cleaning operations are not likely to produce particulate matter in amounts significant enough to violate these standards.

40 CFR Part 63, Subpart MMMM

40 CFR Part 63, Subpart MMMM limits the organic HAP emissions from the surface coating of miscellaneous metal parts and products based on the types of the coatings being used. This MACT standard requires the Permittee to use at least one of the three compliance options listed below:

(1) Compliant materials option.

(2) Emission rate without add-on control option which requires each 12-month average organic HAP emission rate based on all the coatings, thinners, additives and/or cleaning materials used for a coating operation to be less than or equal to the applicable emission limit. And

(3) Use of add-on control option.

Subpart MMMM MACT standard allows the Permittee to use certain combination of the above options to comply with the HAP emission limit. Both the compliant material and the emission rate without add-on control options also allow alternative/additional compliance approaches including predominant activity emission limit and facility-specific emission limit. The Permittee has notified the Division that the facility will comply with the applicable Subpart MMMM standard for HAP emissions with Compliant Materials Option and/or Emission Rate Without Add-on Control Option. Therefore, in this permit all the emission limitation, operating, testing, monitoring, record keeping and/or reporting conditions relevant to the MACT standard are tailored for the facility's compliance approach.

40 CFR Part 63, Subpart ZZZZ

All three IC engines are spark ignition, 4-stroke, rich-burn (4SRB) units, each rated at approximately 160 brake horsepower (HP). GATX purchased the engines in approximately 1996. The engine C19 was installed at Waycross in February 1996. Engine C24 was previously located at another GATX facility and then installed at Waycross in 2008. Engine C25 was also relocated from another site to Waycross in 2010. All three IC engines are subject to the RICE MACT.

Engines C24 and C25 qualify as new stationary RICE because both of these engines were installed at the Waycross facility after June 12, 2006. All new or reconstructed 4SRB SI RICE meet the requirements of the RICE MACT by meeting the requirements of 40 CFR Part 60, Subpart JJJJ (§ 63.6590(c)). No further requirements apply for such engines under Subpart ZZZZ. However, most of the specific requirements of Subpart JJJJ apply only to manufacturers of SI internal combustion engines (ICE) or to owners and operators of stationary SI ICE that are manufactured on or after July 1, 2007 (§ 60.4230). Engines C24 and C25 were manufactured before this date and therefore are not subject to any emission standards or other requirements in Subpart JJJJ.

40 CFR Part 63, Subpart DDDDD

Boilers B001, B002, and B003 subject to 40 CFR 63 Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

40 CFR 60 Subpart Dc

Boilers B001, B002, and B003 subject to 40 CFR 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

C. Permit Conditions

A toxic impact assessment was performed on the railcar cleaning operations in October 1996 which included an expansion of the railcar cleaning operations. A Screen 3 model was run and based on 24 hours of emissions for all commodities except those listed in Condition No. 3.2.1 which were modeled on 1 hour of operation per day as requested by the facility since the time to clean one railcar of these commodities is 1 hour. Vinyl chloride emissions were modeled for 50 hours per week. By limiting railcar-cleaning operations, no material exceeded the acceptable ambient concentrations. Condition Nos. 3.2.1 and 3.2.2 incorporate these limits.

Condition 3.2.3 limits the boilers B001, B002, and B003 burn natural gas and/or propane only.

Condition 3.3.1 establishes the applicable HAP emission limits of Subpart MMMM for the existing metal parts surface coating operations at this facility. This condition defines the existing affected sources subject to Subpart MMMM at this facility. As informed by the Permittee, this facility uses "general use" coatings for the affected sources.

Condition 3.3.2 allows the Permittee to have the two options for compliance with the applicable emission limit(s) in Condition 3.3.1, as allowed by Subpart MMMM. Note that the emission rate without add-on controls option is based on the 12-month roll averaging of the HAP emissions from an affected source(s) in the interest.

Condition Nos. 3.3.3 through 3.3.5 are the emission limitations and operating limitations for 40 CFR Part 63 Subpart ZZZZ.

Permit Condition 3.3.6 is NSPS Subpart Dc requirement for the boilers B001, B002, and B003.

Permit Conditions 3.3.7 and 3.3.8 are MACT Subpart DDDDD requirements for the boilers B001, B002, and B003.

Condition No. 3.4.1 incorporates the standards of Georgia Rule (b) into the permit.

Condition No. 3.4.2 incorporates the standards of Georgia Rule (e) into the permit.

Permit Conditions 3.4.3 and 3.4.4 are the Georgia Rules 391-3-1-.02(2)(d) requirements for the boilers B001, B002, and B003.

Permit Condition 3.4.5 is the Georgia Rules 391-3-1-.02(2)(g) requirement for the boilers B001, B002, and B003.

Condition 3.5.1 is the control device requirement for emission units (0009, 0013, and 0020).
Condition Nos. 3.5.2 through 3.5.9 relate to the equipment specific requirements necessary to comply with the toxic guideline. Specifically,

Condition No. 3.5.2 requires that the tankcar cleaning system's (ID Nos. 0016-old and 0016-new) scrubbers (ID Nos. C16a-old and C16a-new) and carbon adsorbers (ID Nos. C16b-old and C16b-new) achieve an overall emission reduction efficiency of at least 98 percent.

Condition No. 3.5.3 requires that the tankcar cleaning systems (ID Nos. 0016-old and 0016-new) achieves an overall emission reduction efficiency of at least 98 percent for chlorofluorocarbons (CFC) vented to the system.

Condition No. 3.5.4 requires that the flare (ID No. C17) to the organic commodity pressurized tank car gas purge system (ID No. 0017) provides an overall emission reduction efficiency of at least 99 percent.

A toxic impact assessment was performed when the facility submitted an application for the original equipment at the facility (June of 1993). In order to assure that no material exceeded maximum allowable concentrations, Condition No. 3.5.5 requires that all tank cars containing methyl bromide are flared for at least a 3-hour period, and Condition No. 3.5.6 requires that no more than 2,125 pounds of methyl bromide be flared during any 2-consecutive hour period.

Condition No. 3.5.7 requires that the flare (ID No. C17) to the organic commodity pressurized tank car gas purge system (ID No. 0017) achieves an overall emission reduction efficiency of at least 99.5 percent when flaring ammonia.

Condition No. 3.5.8 requires the facility operate and maintain the organic commodity pressurized tank car gas purge system (ID No. 0017) such that its flare (ID No. C28) is operating and provides an overall emission reduction efficiency of at least 98 percent.

Condition 3.5.9 has been modified to include Purge Engine C24 and I.C. Engine C25.

Condition 3.5.10 separates the exterior operation (ID No. 0008), which is controlled by baghouse C8, and interior blasting operations (ID Nos. 0011 and 0022), which are controlled by baghouses C11 and C22, and also includes interior blasting operations (ID Nos. 0026 and 0027), which are controlled by baghouses C26 and C27.

Condition 3.5.11 requires that the tankcar cleaning systems' (ID Nos. 0016-old and 0016-new) scrubber and carbon adsorbers (ID Nos. C16c and C16d) achieve an overall emission reduction efficiency of at least 98 percent.

Condition 3.5.12 is a new Condition. It is requires that process gases consisting of at least two activated carbon canisters that are connected in series.

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

Conditions No. 4.2.1 through 4.2.3 were the one time performance testing requirements for 40 CFR Part 63 Subpart ZZZZ. The Conditions have been 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 is the monitoring requirement for the pH range of the Venturi scrubbers (ID Nos. C16a-old, C16a-new, and C16c) to ensure the proper control efficiency.

Conditions 5.2.2 and 5.2.3 are the monitoring requirement for the carbon adsorbers (ID Nos. C16b-old, C16b-new, and C16d) to ensure the proper level of control efficiency. The Conditions are modified from previous Conditions for the monitoring requirement for carbon adsorbers.

Condition 5.2.4 is the performance specifications for flares, baghouses, paint booth filters, and natural gas consumption meters. This Condition combined the Condition 5.2.3 in Permit Amendment No. 4741-299-0015-V-03-1, Condition 5.2.7 in Permit No. 4741-299-0015-V-03-0, and Condition 5.2.12 in Permit Amendment No. 4741-299-0015-V-03-2.

Conditions 5.2.5 and 5.2.6 ensure the presence of a flame on the flare and limit visible emissions from the flares upon startup.

Condition 5.2.7 ensures the proper operation of the IC Engines C19, C24, and C25.

Condition 5.2.8 is the visible emission monitoring requirements for baghouses (ID Nos. C8, C11, C22, C26, and C27).

Condition 5.2.9 is the Preventive Maintenance Program requirement for baghouses (Air Pollution Control Devices C26 and C27).

Condition 5.2.13 is MACT DDDDD monitoring requirement for the boilers B001, B002, and B003.

MACT Subpart ZZZZ required initial performance test for S.I. engine C19 only, there is no continue monitoring requirement for the S.I. engine C19.

C. Compliance Assurance Monitoring (CAM)

Conditions 5.2.10, 5.2.11, and 5.2.12 establish the CAM monitoring requirements for emission units (0008, 0009, and 0011).

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.

Condition 6.1.7 includes Flare C28 from Permit Amendment No. 4741-299-0015-V-03-1.

Conditions 6.1.7c.xiii and 6.1.7c.xiv are NSPS Subpart Dc reporting and recordkeeping requirements for the boilers B001, B002, and B003 from Permit Amendment No. 4741-299-0015-V-03-2.

Condition 6.1.7d.i has been added as MACT DDDDD reporting and recordkeeping requirements for the boilers B001, B002, and B003 from Permit Amendment No. 4741-299-0015-V-03-2.

B. Specific Record Keeping and Reporting Requirements

Permit Conditions 6.2.1 through 6.2.4 establish the record keeping and reporting requirements for Permit Condition 2.1.1.

Condition 6.2.5 establishes the record keeping and reporting requirements for filters C9, C13, C20, C8, C11, and C22.

Condition 6.2.6 establishes the record keeping requirement for Condition 5.2.9.

Condition 6.2.7 establishes a Subpart MMMM requirement for the Permittee to prepare and submit semiannual compliance reports. These reports shall include all the applicable information and data itemized by this condition and be submitted on time.

Condition 6.2.8 establishes a specific record keeping requirement for all the coating materials subject to the HAP emission limit(s) under Subpart MMMM. These material records are essential for the demonstration compliance with the applicable HAP emission limit(s) involved.

Condition 6.2.9 establish a specific record keeping requirement for all the compliance options used by the Permittee to comply with the applicable HAP emission limit(s) under Subpart MMMM. These records are essential for the demonstration compliance with the applicable HAP emission limit(s) involved.

Condition 6.2.10 establishes the recording keeping and compliance determination requirements for the compliant material option specified in Condition 3.3.2. All the material data shall be obtained in accordance with Condition 6.2.7.

Condition 6.2.11 establishes the compliance determination requirement for the emission rate without add-on control option specified in Conditions 3.3.2. This condition contains all the equations used in the compliance determination. Note that the actual HAP emission rate determined using Equation 3 is a 12-moth rolling average, and therefore shall be calculated monthly.

Conditions 6.2.12 through 6.2.17 establish the record keeping requirements for all the coatings, thinners/additives, and/or cleaning materials subject to the Subpart MMMM, and for off-site disposed wastes accounting for HAP emission allowance. These records are essential for the demonstration of compliance with the applicable HAP emission limit(s) involved.

Conditions 6.2.18 and 6.2.19 are the reporting and record keeping requirements for 40 CFR Part 63 Subpart ZZZZ.

Conditions 6.2.20 and 6.2.21 are NSPS Subpart Dc reporting and recordkeeping requirements for the boilers B001, B002, and B003.

Conditions 6.2.22 through 6.2.25 are MACT DDDDD reporting and recordkeeping requirements for the boilers B001, B002, and B003.

Condition 6.2.26 is a new Condition. It is the recordkeeping requirement for the Carbon Adsorption system.

VII. Specific Requirements

A. Operational Flexibility

The facility did not indicate that the process or equipment is involved in an alternate operating scenario.

B. Alternative Requirements

There are no alternative requirements indicated.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

The facility has not requested to operate any temporary sources.

E. Short-Term Activities

The facility did not report any short-term activities.

F. Compliance Schedule/Progress Reports

Based on all presently available information, no compliance or progress reports are necessary.

G. Emissions Trading

The facility is not involved in any emissions trading.

H. Acid Rain Requirements

The facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit.

J. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

K. Specific Conditions

None

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