

Facility Name: KaMin - Wrens Calcine Plant
 City: Wrens
 County: Jefferson
 AIRS #: 04-13-163-00026

Application #: TV-630864
 Date Application Received: March 9, 2022
 Permit No: 3295-163-0026-V-06-0

| Program | Review Engineers | Review Managers |
|-----------------------------------|-------------------------|------------------------|
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| Permitting Program Manager | | Stephen Damaske |

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:

KaMin - Wrens Calcine Plant.

2. Parent/Holding Company Name

KaMin LLC.

3. Previous and/or Other Name(s)

Anglo American Clays Corporation
ECC International, Wrens Plant
J. M. Huber, Wrens Calcine Plant

4. Facility Location

1601 Cedar Grove Road
Wrens, Georgia 30833

The last permit renewal showed the facility mailing address, 2069 Howard Mill Road, as its physical address.

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

The facility is located in an area designated as an attainment area for all criteria pollutants.

B. Site Determination

KaMin LLC (KaMin) operates two non-metallic minerals processing facilities in Wrens, Georgia. The two sites are designated as KaMin – Wrens Main and KaMin – Wrens Calcine Plant. The two plants are under common control and operate independently. The plants are not contiguous because they are separated by property not owned by KaMin.

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 |
|---|---------------------------------|--------------------------------|
| 3295-163-0026-V-05-0 | October 3, 2017 | Title V Renewal |
| Off-Permit Change (Application # 26565) | May 30, 2018 | Addition of a non-NSPS bagger. |

| | | |
|--|---------------|---|
| Off-Permit Change (Application # 28282) | March 1, 2022 | Addition of 3 Calciner Bagger Silos, one Railcar unloading collector and one calciner product transfer. |
|--|---------------|---|

D. Process Description

1. SIC Codes(s)

3295 & 1455.

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 is a kaolin processing plant.

3. Overall Facility Process Description

This facility produces hydrous kaolin and calcined kaolin that are used as an additive to manufacture a variety of consumer goods, including paper, paints, rubber, and inks.

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 minor source with respect to the *Prevention of Significant Deterioration* (PSD).

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 ₂ S | | | | |
| Individual HAP | ✓ | | | ✓ |
| Total HAPs | ✓ | | | ✓ |

3. MACT Standards

This facility is not subject to any MACT standards.

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 | no |
| Program Code V – Title V | yes |

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Condition 2.2.1 refers to the applicable provisions of 40 CFR 60 Subpart A, *General Provisions*.

C. Compliance Status

Application No. TV-630864 indicates the facility is operating in compliance with the rules and regulations.

D. Permit Conditions

No facility-wide conditions are included in the permit other than NSPS general requirements and the general provisions in Section VIII.

III. Regulated Equipment Requirements

A. Equipment List for the Process

The Emission Units Table has been amended to remove the column “Corresponding Permit Conditions” per EPD Guidance. Emission units, applicable requirements/standards and air pollution control devices have been updated to include the emission units added as off-permit changes. Applicability of 40 CFR 60 Subpart A has been removed from the “Applicable Requirements/Standards” column because Subpart A applicability is mentioned in 40 CFR 60 Subpart OOO and 40 CFR 60 Subpart UUU.

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|----------------|--|---|-------------------------------|-------------|
| ID No. | Description | | ID No. | Description |
| H1 | Horizontal Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | P7C | Baghouse |
| H2 | Horizontal Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | P7C | Baghouse |
| M34 | “CMT” Pre-Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M34C | Baghouse |
| M35 | “CMT” Pre-Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M35C | Baghouse |
| M36 | “CMT” Post-Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C | Baghouse |
| M37 | “CMT” Post-Mill | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M37C | Baghouse |
| D6 | Spray Dryer No. 6 (32 MMBtu/hr, firing natural gas/propane) | 40 CFR 60 Subpart UUU 391-3-1-.02(2)(g) 391-3-1-.02(2)(p) | D6C | Baghouse |
| C6 | Calcliner No. 6 (64 MMBtu/hr, firing natural gas/propane) | 40 CFR 60 Subpart UUU 391-3-1-.02(2)(g) 391-3-1-.02(2)(p) | D6C | Baghouse |
| K6 | Cooler/Horizontal Mill Feed | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | K6C | Baghouse |
| B1 | Feed Silo (Steel Bin) | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | B1C | Bin Vent |
| R1 | Railcar/Truck Loading System | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C, M37C | Baghouse |
| R2 | Railcar/Truck Loading System | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C, M37C | Baghouse |
| R3 | Railcar/Truck Loading System | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C, M37C | Baghouse |
| S1 | Silo 1 (Calcined Product) | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C, M37C | Baghouse |

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|----------------|------------------------------|--|-------------------------------|-------------|
| ID No. | Description | | ID No. | Description |
| S2 | Silo 2 (Calcined Product) | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | M36C, M37C | Baghouse |
| S3 | Calcine Bagger Silo A | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | S4C | Bin Vent |
| S4 | Calcine Bagger Silo B | | S5C | Bin Vent |
| S5 | Calcine Bagger Silo C | | S6C | Bin Vent |
| B2 | Calcine Product Transfer Bin | | B2C | Bin Vent |
| R4C | Railcar Unloading Collector | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | --- | None |
| CCB1 | Belt Conveyor 1 | 40 CFR 60 Subpart OOO 391-3-1-.02(2)(p) | --- | None |
| CCB2 | Belt Conveyor 2 | | --- | None |

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

Some of the equipment in this plant is subject to 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*, and 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*. In addition to the plant is subject to the State rules, the most prominent of which are summed up in Section 3.4 of the enclosed permit.

C. Permit Conditions

KaMin - Wrens Calcine Plant has not made significant changes since Title V renewal permit 3295-163-0026-V-05-0 was issued, on October 3, 2017. Existing permit conditions cover the emission units added as off-permit changes. KaMin - Wrens Calcine Plant requested relaxing the reporting frequency of excess emissions, exceedances, and/or excursions from quarterly to semiannual because the facility does not have Continuous Emission Monitoring System (CEMS). This request was granted, and Condition 6.1.4 was amended accordingly. 40 CFR 60 Subpart UUU phrase “*No emissions shall be discharged into the atmosphere from any affected facility that*” was added to Condition 3.3.2 for clarification. Moreover, Condition 3.5.3 was added and 4.2.2 was better worded. 40 CFR 60 Subpart A, General Provisions, Condition was moved to 2.2.1. The wording of Condition 6.2.3 brings current to the wording used for similar facilities. Other than this, the conditions of Title V permit No. 3295-163-0026-V-05-0 were carried over to the enclosed permit.

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

Required initial performance tests have been completed. However, the enclosed permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment and Condition 4.2.1 is meant to require initial performance test be performed in accordance with 40 CFR 60.8 and the applicable NSPS Subpart. Condition 4.2.2 addresses required repeat performance testing according to 40 CFR 60.11 and 40 CFR 60.675.

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

No new monitoring conditions are being added in the enclosed Title V Renewal Permit.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. Each emission unit controlled by a control device that *"has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source,"* as defined by 40 CFR §64.2(a)(3) is subject to CAM.

A portion of Title V renewal Application TV-630864 reads as: *"There have not been any permit revisions involving [units subject to CAM]. Therefore, the CAM plan submitted as part of this application is just a resubmittal of a previously EPD- approved CAM plan."*

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.

Existing Condition 6.1.4 requires KaMin to submit excess emissions, exceedances, and/or excursions on a quarterly basis. EPD has recently relaxed the reporting requirement for all facilities that do not have a Continuous Emission Monitoring System (CEMS). Because KaMin does not have a CEMS in place, the quarterly reporting can now be replaced by a semiannual reporting period. Also, new Condition 6.2.3 has been added to address new 40 CFR 60 Subpart OOO required reporting.

B. Specific Record Keeping and Reporting Requirements

None is being added to in the enclosed Title V Renewal Permit.

VII. Specific Requirements

A. Operational Flexibility

Conditions 7.1.1 and 7.2.1 contain general operational flexibility provisions.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

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

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None associated with the enclosed permit.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None 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.//