Facility Name: **Thiele Kaolin Company, Reedy Creek**
City: Wrens
County: Glascock
AIRS #: 04-13-125-00001

Application #: TV-689157
Date Application Received: September 23, 2022
Permit No: 3295-125-0001-V-05-0

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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: Thiele Kaolin Company, Reedy Creek

2. Parent/Holding Company Name: Thiele Kaolin Company

3. Previous and/or Other Name(s): None

4. Facility Location

1735 Thiele Road
Wrens, Georgia 30833
(Glascock County)

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

The facility is located in an attainment area.

B. Site Determination

Thiele's Huff and Hobbs Mines, located in Warren County, are contiguous to the Reedy Creek plant and under common control; therefore, they are considered one site with regard to Title V.

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
3295-125-0001-V-04-0	March 26, 2018	3rd Title V Permit Renewal
Off-Permit-Change	January 27, 2023	Installation of a Stamler Feeder/Crusher (EUID HM03 with a Baghouse HB01
Off-Permit-Change	August 6, 2020	Installation of a new blunger with associated material handling equipment.
Off-Permit-Change	August 22, 2019	Installation of a new screw conveyor (RC12).
Off-Permit-Change	January 25, 2018	Replacement of the Spray Dryer one-ton Bagger (RP02) with a new, larger capacity unit and a new baghouse (RB39).
Off-Permit-Change	June 9, 2016	Non-NSPS modification of Emission Unit No. RC08

D. Process Description

1. SIC Codes(s)

3295

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 processes kaolin.

3. Overall Facility Process Description

Thiele Kaolin Company (Thiele) operates a kaolin clay processing facility located in Wrens, Glascock County, Georgia. Thiele, Reedy Creek Plant is comprised of various kaolin clay processing operations including fractionation, leaching, filtration, grinding, drying, milling, intermediated and final product conveying and storage, bagging and bulk product loading, and ancillary support activities.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Thiele Kaolin Company, Reedy Creek is a major source under PSD/NSR regulations for Sulfur Dioxide (SO_2). However, a PSD permit is not required as SO_2 emissions were below 250 tons per year (tpy) prior to the installation of Boiler No. 2 and Spray Dryer No. 2, which share a 40 tpy SO_2 emission limit to avoid a case-by-case BACT determination under pertinent NSR/PSD rules. Permit conditions limit SO_2 in order to assure significant deterioration does not occur in accordance with 40 CFR Part 52.21 - Prevention of Significant Deterioration (PSD) of Air Quality.

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_2S	n/a			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The facility is not a major source of HAP emissions. The facility is subject to all applicable provisions of the following area source standards:

40 CFR 63 Subpart CCCCCC – *"National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities"*

40 CFR 63 Subpart JJJJJJ - *"National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers"*

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:

None.

B. Applicable Rules and Regulations

All equipment subject to NSPS/40 CFR Part 60 must comply with the provisions of 40 CFR Part 60, Subpart A - *"General Provisions."*

40 CFR Part 60, Subpart A – General Provisions
Subpart A to 40 CFR Part 60 includes general provisions that may be applicable to a source that is subject to another subpart of 40 CFR Part 60. It should be noted, however, that the applicability or non-applicability of every Subpart A provision is specifically addressed on a case-by-case basis in the other Subparts. Therefore, portions of Subpart A may be applicable in cases where other subparts are applicable.

C. Compliance Status

The facility has not indicated any non-compliance issues.

D. Permit Conditions

Condition 2.2.1, establishing the applicability of 40 CFR Part 60, Subpart A - *"General Provisions"* to the facility, has been carried over from the current Title V permit No. 3295-125-0001-V-04-0 into this draft Title V permit without any changes.

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**	**ID No.**	**Description**
RP07	Boiler No. 2	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart JJJJJJ	None	None
RD01	Spray Dryer No.1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)	RB01	Baghouse
RD02 RC01 RC02	Spray Dryer No. 2 Bucket Elevator Rail Car Loading	391-3-1-.02(2)(g) 391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart UUU 40 CFR 60 Subpart OOO	RB02	Baghouse
RM01	Air Float Raymond Mill No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 391-3-1-.02(2)(g)	RB03	Baghouse
RM02	Air Float Raymond Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 391-3-1-.02(2)(g)	RB04	Baghouse
RM03	Air Float 200 ACM Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB05	Baghouse
RP06	30 ton Bin Air Float Bagging	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB06	Baghouse
RM05	Air Float Cage Mill No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 391-3-1-.02(2)(g)	RB07	Baghouse
RM06	Air Float Cage Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 391-3-1-.02(2)(g)	RB08	Baghouse
RM09 RM07 RS16	Dry Screen for Mill A Mill 1 Feed Bin for Mill A	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB09	Baghouse
RM08 RC06 RS17 RS15 RC05 RC12	Mill A (60 ACM Mill) Mill A Screw Conveyor Silo 2 Hopper Mill 1 Hopper Mill 1 Screw Conveyor Conveying of clay to Mill A	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB10	Baghouse
RS13	Spray Dryer No 2 Surge Bin	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB11	Baghouse
RC03	Bucket Elevator No. 2 for Spray Dryer No. 1	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB12	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**ID No.**	**Description**
RS21 RC04	Spray Dryer 1, 50 # bagger Bin Spray Dryer Bagging Scavenger	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB13	Baghouse
RP01	Spray Dryer Bagging Machine and Reclaim	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB14	Baghouse
RP08	50 ton Bulk Bin for 1 ton Bagger	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB15	Baghouse
RP02	Spray Dryer one-ton Bagger	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB39	Baghouse
RP03	Air Float Bagging From Silos 1-3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB16	Baghouse
RS01	Air Float Silo No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB18	Bin Vent
RS02	Air Float Silo No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB19	Bin Vent
RS03	Air Float Silo No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB20	Bin Vent
RS04	Spray Dryer Silo No.1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB21	Bin Vent
RS05	Spray Dryer Silo No.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB22	Bin Vent
RS06	Spray Dryer Silo No.3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB23	Bin Vent
RS07	Spray Dryer Silo No.4	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB24	Bin Vent
RS08	Spray Dryer Silo No.5	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB25	Bin Vent
RS12	Air Float Slurry Makedown	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB28	Bin Vent
RS14	Feed Bin for Mill 1	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB29	Bin Vent
RC07	Bucket Elevator No. 1 for Spray Dryer No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB32	Baghouse
RC08	Spray Dryer No. 1 Railcar Loading Fugitive Dust	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	RB35	Baghouse
RC10	Spray Dryer 1 Bucket Elevator	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	None	None
RC11	Spray Dryer 2 Belt Conveyor	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB38	Baghouse
RP04	Bagging Operation with Surge Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB16	Baghouse
GDF	Gasoline Dispensing Facility	40 CFR 63 Subpart A 40 CFR 63 Subpart CCCCCC	None	None
HM02 HM03	Hobbs Mine 42” Belt Conveyor Stamler Feeder/Crusher	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	HB01	Baghouse
HM01	Hobbs Mine Stamler Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	HB01	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
RC14	KF-90 30" Belt Conveyor	391-3-1-.02(2)(p) 40 CFR 60 Subpart A 40 CFR 60 Subpart OOO	RB36	Baghouse

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

B. Equipment & Rule Applicability

Equipment and Rule Applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 3295-125-0001-V-04-0 as discussed below.

Emission and Operating Caps:

Thiele Kaolin Company, Reedy Creek is a PSD major source for SO_2. The facility has taken limits to avoid NSR/PSD review.

Existing Spray Dryer No. 2 (RD02) or Boiler No. 2 (RP07) are limited such that the total uncontrolled emissions of SO_2 from either does not equal or exceed 40 tons during any 12 consecutive months. The sulfur content of fuel oil must not exceed 0.5% by weight and the consumption of fuel oil from either must not exceed 1.08 million gallons during any 12 consecutive month period. The purpose of these limitations is to avoid PSD review.

Particulate Matter emissions from Spray Dryer No. 1 (RD01) are limited to 20.7 pounds per hour.

Air Float Raymond Roller Mills Nos. 1 and 2 (RM01 and RM02) are limited such that the sulfur content of fuel oil shall not exceed 0.5% by weight.

Rules and Regulations Assessment:

Federal Rules and Regulations -

<u>40 CFR Part 60, Subpart Dc – Small Steam Generating Units</u>
NSPS Subpart Dc regulates small steam generating units with maximum heat input capacities greater than 10 million British thermal unit per hour (MMBtu/hr) and less than 100 MMBtu/hr for which construction, modification, or reconstruction was commenced after June 9, 1989. Boiler No. 2 (RP07) is subject to Subpart Dc as it is a steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989, and has a maximum design heat input capacity of 31.5 MMBtu/hr. The rule limits SO_2 emissions to 0.50 lbs/MMBtu and visible emissions to 20% opacity (except one 6-minute period not to exceed 27%). The plant will comply with this rule by only combusting natural gas and fuel oil with a sulfur content of 0.5% by weight or less.

<u>40 CFR Part 60, Subpart OOO – Nonmetallic Mineral Processing Plants</u>
NSPS Subpart OOO applies to crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station in fixed or

portable nonmetallic mineral processing plants, that commences construction, modification, or reconstruction after August 31, 1983. The plant is a kaolin processing facility, which meets the definition of nonmetallic mineral processing; therefore, each source of the types listed is potentially subject to NSPS Subpart OOO.

Affected facilities that commenced construction modification or reconstruction after August 31, 1983, but before April 22, 2008, are limited to 0.022 gr/dscf particulate matter. A 7% stack opacity limit applies to all affected sources using dry controls. Dry control devices on individual enclosed storage bins are exempt from the grain loading limit. All sources are subject to a 10% fugitive opacity limit (15% for crushers without capture systems).

Some affected sources were constructed or modified after April 22, 2008, and are therefore limited to 0.014 gr/dscf for stack emissions or 7% fugitive opacity. Affected sources constructed or modified after April 22, 2008 and having no water sprayers or water carryovers are also subject to a requirement for 5-year repeat performance tests for fugitive opacity compliance per Table 3 to NSPS Subpart OOO. Properly operated baghouses and bin vents ensure compliance with NSPS Subpart OOO.

40 CFR Part 60, Subpart UUU – Calciners and Dryers in Mineral Industries

Spray Dryer No. 2 is subject to NSPS Subpart UUU as it was constructed after April 23, 1986. The plant will comply with the provision as stack emissions from each subject emission unit will not contain particulate matter in excess of 0.057 g/dscm (0.025 grains/dscf) and will not exhibit greater than 10% opacity. A properly operated baghouse (RB02) ensures compliance with NSPS Subpart UUU.

40 CFR Part 63, Subpart A – General Provisions

Any source subject to a specific NESHAP is also subject to the general provisions of NESHAP Subpart A. Subpart A establishes compliance dates, operation and maintenance standards, and compliance, testing, monitoring, notification, recordkeeping, and reporting requirements for all other subparts as applicable.

40 CFR Part 63, Subpart JJJJJJ – NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers

This rule regulates boilers at area sources of HAP. The plant operates Boiler No. 2 that combusts natural gas with distillate fuel oil backup; it has a heat input capacity of 31.5 MMBtu/hr. Since the boiler was constructed prior to June 4, 2010, it is considered an existing source per 40 CFR 63.11194(c). As fuel oil is only combusted during supply interruptions or curtailments and up to 48 hours per year for testing and maintenance purposes, the unit meets the definition of "gas-fired" and is exempt from the standard according to 40 CFR 63.11195(e).

40 CFR Part 63, Subpart CCCCCC – NESHAP for Area Sources: Gasoline Dispensing Facilities

This rule regulates HAP emissions from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) at area sources. The GDF at the plant has a monthly gasoline throughput well below 10,000 gallons, therefore it is required to comply with the work practice requirement and record the gasoline throughput. The plant will comply with the requirements under Subpart CCCCCC.

Georgia Rules and Regulations

391-3-1.02(2)(b) – Visible Emissions

This rule limits opacity from emission points and structures to 40%, except in cases where another rule or regulation applies a more stringent requirement. Properly operated baghouses and scrubbers will ensure compliance with the 40% opacity limit.

391-3-1.02(2)(d) – Fuel-Burning Equipment

This rule limits particulate and opacity from certain fuel burning equipment at the facility, as defined in Georgia Rule 391-3-1-.01(cc), which includes only equipment in which the material being heated, and the combustion process are separated by a heat exchanger. The boiler operated at the plant meets the definition of fuel-burning equipment. The facility will comply with this rule by the exclusive combustion of natural gas and distillate oil.

391-3-1.02(2)(g) – Sulfur Dioxide

This regulation limits the sulfur content of the fuels used in combustion to 2.5% by weight. The plant uses distillate oil and natural gas, as well as diesel fuel limited to 0.5% sulfur by weight to ensure compliance.

391-3-1.02(2)(n) – Fugitive Dust

Rule (n) requires facilities to take reasonable precautions to limit their fugitive dust emissions, such as using water or chemicals for control of dust in construction operations. The rule limits visible emissions from fugitive dust to 20% opacity. Thiele will continue to take reasonable precautions on an as-needed basis to limit fugitive dust emissions from the plant.

391-3-1.02(2)(p) – Particulate Emissions from Kaolin and Fuller's Earth Process

This rule limits PM emissions from manufacturing processes based on a process rate. For all process equipment put into operation or extensively after January 1, 1972, particulate matter emissions may not equal or exceed the allowable rates specified in the below equations.

$E = 3.59P^{0.62}$; for process input weight rate up to and including 30 tons/hour.
$E = 17.31P^{0.16}$; for process input weight rate above 30 tons/hour
For equipment put into operation or extensively altered on or before January 1, 1972, particulate matter emissions may not equal or exceed the allowable rates specified in the below equations.

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons/hour.
$E = 55P^{0.11} – 40$; for process input weight rate above 30 tons/hour

Where

E = The allowable emission rate is in pounds per hour.
P = The process input weight rate is in tons per hour.

The use of baghouses and scrubbers ensures compliance with this rule.

C. Permit Conditions

All the conditions in the current Title V permit No. 3295-125-0001-V-04-0 were carried over into the proposed Title V permit renewal No. 3295-125-0001-V-05-0 without change.

The SO_2 and PM emission limits in Conditions 3.2.1 and 3.2.2 allow a previous modification involving the installation and operation of Spray Dryer No. 2 (RD02) and Boiler No. 2 (RP07) to remain minor under pertinent PSD/NSR rules, and therefore avoid a case-by-case BACT determination.

The fuel oil sulfur content limit in Condition 3.2.3 allows a previous modification involving the installation and operation of Air Float Raymond Roller Mills Nos. 1 and 2 (RM01 and RM02) to remain minor under pertinent PSD/NSR rules, and therefore avoid a case-by-case BACT determination.

Condition 3.3.1 contains PM, visible and fugitive emissions limits under 40 CFR Part 60, Subpart OOO, *"Standards of Performance for Nonmetallic Processing Plants."*

Condition 3.3.2 contains applicable PM and visible emission limits under 40 CFR Part 60, Subpart UUU, *"Standards of Performance for Calciners and Dryers in Mineral Industries,"*. Theses limits apply to Spray Dryer No. 2, Bucket Elevator and Rail Car Loading.

Condition 3.3.3 contains applicable requirements for Boiler No. 2 (RP07) which is subject to 40 Part 60, Subpart Dc as well as 40 CFR Part 60, Subpart A.

Condition 3.3.4 contains the requirements for Boiler No. 2 (RP07) to be operated as a gaseous fuel fired boiler and therefore avoid 40 CFR Part 63, Subpart JJJJJJ. Requirements include applicable fuels and circumstances and limits on hours for boiler testing with fuel oil.

Condition 3.3.5 establishes the applicability of 40 CFR Part 63, Subpart CCCCCC to the Gasoline Dispensing Facility (GDF) at the site.

Condition 3.3.6 requires the facility to calculate the monthly throughput of gasoline in accordance with 40 CFR Part 63, Subpart CCCCCC.

Condition 3.3.7 requires the facility to operate and maintain the GDF with good air pollution control practices to minimize emissions in accordance with 40 CFR Part 63, Subpart CCCCCC.

Conditions 3.3.8 and 3.3.9 list measures the facility must take for proper handling to minimize vapor releases to the atmosphere in accordance with 40 CFR Part 63, Subpart CCCCCC.

Conditions 3.4.1, 3.4.2, 3.4.3 and 3.4.4 are template/standard conditions incorporating applicable requirement s and standards under Georgia Rules(p), (b), (d) and (g).

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

Both Conditions 4.2.1 and 4.2.2 are carried over from the current permit No. 3295-125-0001-V-04-0. Condition 4.2.1 is a standard condition for performance testing under 40 CFR Part 60. Condition 4.2.2 requires the facility to conduct a repeat test within five years from the previous performance test for fugitive emissions from an affected facility without water sprays, which is subject to 40 CFR Part 60, Subpart OOO, and constructed, modified, or reconstructed on or after April 22, 2008.

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

Conditions 5.2.1 through 5.2.8 are all carried over from the current Title V operating permit No. 3295-125-0001-V-04-0 without change.

Condition 5.2.1 establishes the instrumental monitoring requirement for visible emissions from Spray Dryer No. 2 Baghouse (RD02) under 40 CFR Part 60, Subpart UUU.

Condition 5.2.2 requires the Permittee to perform a daily check of visible emissions from all baghouses (including process baghouses) controlling emissions from process units at this facility. Emission units monitored using COMs are exempt from this condition. Baghouses controlling emissions from silos with dedicated bin vents, wet screening operations, bucket elevators, screw conveyors, bagging operations, and pneumatic conveyors are exempt from this condition provided those baghouses and respective emission units are not subject to CAM per Conditions 5.2.7 and 5.2.8. The Permittee shall determine the cause of the visible emissions (if it exceeds the applicable opacity action level) and correct the problem in the most expedient manner possible.

To ensure the proper functioning of baghouses, Condition 5.2.3 requires the Permittee to develop and implement a Preventive Maintenance Program for the baghouses specified in Condition 5.2.2 to assure that the provisions of Condition 8.17.1 are met. This condition requires, at a minimum, the Permittee to perform the operation and maintenance checks on the relevant baghouse at least a weekly basis and record the findings and corrective actions taken in a maintenance log.

The monitoring requirement for baghouse temperature in Condition 5.2.4 prevents fabric filter bags of the baghouses working at elevated temperature from heat damage, and therefore ensures the proper function of the baghouses and compliance with the applicable PM and visible emission limits.

To ensure the compliance with the applicable PM and visible emission limits, Condition 5.2.5 requires the Permittee to inspect once each week during operation, all sources listed in Table 3.1 and any equipment added or replaced in accordance with the provisions of Condition 7.1.2 for which no air pollution control device is utilized. Boilers, wet process, air heaters, and emission units monitored in accordance with Conditions 5.2.1 or 5.2.2 are exempt from this condition. The inspection shall be performed by conducting a walk-through of the facility and noting the occurrence of any visible emissions or any mechanical failure that results in increased air emissions in a weekly (VE) log. For each unit noted with visible emissions, mechanical problems or malfunctions, the Permittee shall take corrective action in the most expedient manner possible and reinspect the unit within 24 hours to verify that no visible emissions exist. Failure to eliminate the visible emissions or

to correct the mechanical failure or malfunction specified in a. and b. within 24 hours shall constitute an excursion.

C. Compliance Assurance Monitoring (CAM)

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. Condition 5.2.6 identifies the emission units subject to CAM rules/requirements. Conditions 5.2.7 and 5.2.8 contain the applicable Compliance Assurance Monitoring (CAM) requirements.

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 [quarterly or semiannual] basis.

B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1 through 6.2.11 are all carried over from the current Title V operating permit No. 3295-125-0001-V-04-0 without change.

Condition 6.2.1 incorporates the applicable notification requirements for sources subject to 40 CFR Part 60, Subpart A. However, 40 CFR 60.676(g) of NSPS Subpart OOO waives the 40 CFR Part 60, Subpart A's requirement under 40 CFR 60.7(a)(1) for notification of the date construction or reconstruction commenced for affected facilities subject to NSPS Subpart OOO. But the Permittee is required to submit a notification of the actual date of initial startup of NSPS equipment postmarked within 15 days after such date.

Condition 6.2.2 incorporates the detailed reporting and record keeping provisions of 40 CFR Part 60, Subpart OOO for replacing equipment subject to NSPS Subpart OOO. This condition requires the Permittee to keep, and report detailed capacity information about the new equipment and the existing equipment to be replaced. The capacity information will help to determine if an equipment replacement could change production rate and thus potential emission rate.

The record-keeping and reporting requirements in Conditions 6.2.3, 6.2.4 and 6.2.5 ensure the compliance with the operational limits in Condition 3.2.1 and 3.2.3.

Condition 6.2.6 ensures the compliance with the oil fuel usage limit in Condition 3.3.4 for avoiding 40 CFR Part 63, Subpart JJJJJJ.

Condition 6.2.8 requires the Permittee to submit with the semiannual reports required by Condition 6.1.4, a 12-consecutive month total of fuel oil combusted in Boiler No. 2 (RP07) and Spray Dryer No. 2 (RD02) for each of the six months in the semiannual period. This condition ensures compliance with the fuel oil usage limit in Condition 3.2.1.

The record keeping and reporting requirements for fuel oil sulfur content in Conditions 6.2.9 and 6.2.10 ensure the compliance with the fuel oil sulfur content limits in Condition 3.2.1 and 3.2.3.

The record keeping requirements for the Gasoline Dispensing Facility (GDF) ensure compliance with the operational limitations and requirements in Conditions 3.3.5, 3.3.6, 3.3.7, 3.3.8 and 3.3.9.

VII. Specific Requirements

A. Operational Flexibility

Not applicable flexibility

B. Alternative Requirements

Not applicable flexibility

C. Insignificant Activities

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

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

None

H. Acid Rain Requirements

Not applicable

I. Stratospheric Ozone Protection Requirements

Not applicable

J. Pollution Prevention

Not applicable

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

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.//