Facility Name: **Milliken & Company – Valway Plant**
City: LaGrange
County: Troup
AIRS #: 04-13-285-00045

Application #: TV-690941 and TV-877082
Date Application Received: November 3, 2022 and December 2, 2024
Permit No. 2262-285-0045-V-05-0

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: Milliken & Company – Valway Plant

2. Parent/Holding Company Name

   Milliken & Company

3. Previous and/or Other Name(s)

   None.

4. Facility Location

   1300 Fourth Avenue, LaGrange, GA 30240 (Troup County).

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

   Milliken & Company-Valway Plant (hereinafter "facility") is located in Troup County, which is in an attainment area for all criteria air pollutants.

B. Site Determination

Milliken & Company – Hillside Coating Plant (AIRS No. 285-00082) (hereinafter "Hillside Coating") and Milliken & Company – Valway Plant (AIRS No. 285-00045) are located on contiguous property, operate under common control, **but** do not operate under the same two-digit SIC major group. The Hillside Coating Plant operates under the two-digit SIC major group 30 (Rubber and Miscellaneous Plastics Products). The Valway Plant operates under the two-digit SIC major group 22 (Textile Mill Products). According to the definition of Part 70 Major Source in 40 CFR 70.2, the two facilities are not the same Title V site for criteria pollutants.

Milliken & Company – Hillside Coating Plant and the facility constitute one Title V site for emissions of hazardous air pollutants (HAPs) because they are located on contiguous property, operate under common control, and emit more than 10/25 tpy single/combined hazardous air pollutants (HAP), combined. According to the definition of "A major source under Section 112 of the Act" in 40 CFR 70.2, the two facilities are one Title V site for HAPs.

This Title V Permit will cover only the Milliken & Company – Valway Plant (AIRS No. 285-00045).

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
2262-285-0045-V-04-0 (Application # 26278)	5/4/2018	Title V Renewal
Off-Permit Change (Application # 27496)	4/13/2020	New product with new chemistry on textile ranges with ID Nos. R003 and R006.
Off-Permit Change (Application # 27510)	5/6/2020	Construction and operation of one CO laser cutting device (ABL1).
Off-Permit Change (Application # 27520)	5/8/2020	Chemistry changes to materials applied on coating range R003 for COVID-19 related medical gown production.
Off-Permit Change (Application # 27661)	9/24/2020	Operate a diesel engine

D. Process Description

1. SIC Codes(s)

   2262-Finishers of Broadwoven Fabrics of Manmade Fiber and Silk

   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)

   Finished and coated fabrics.

3. Overall Facility Process Description

   Broadwoven fabrics are processed in one of five Textile Ranges (R001, R003, R004, R005, and R006). Textile Ranges R001, R003, R004, and R005 are capable of dyeing and finishing the fabric using dyeing dip tanks, finishing applicators, and ovens. Textile Ranges R003 and R006 are capable of coating the fabric using knife coaters (and/or rotogravure coaters) and ovens. Textile Ranges R005 and R006 also include scouring boxes.

   The facility operates fabric inkjet printing operations (DPR5, DPR6, and DPR7) which are specified in Attachment B of the Permit.

The facility operates a 70 MMBtu/hr Boiler (HB01) to provide any steam required. The boiler was permitted to fire natural gas, propane, and/or residual fuel oil. According to Ms. Deb Basnight, the fuel oil system onsite has been fully disabled. HB01 is now capable of firing natural gas only. The facility will eventually replace Boiler HB01 with Boilers SG01 and SG02 per Application No. TV-877082. Boilers SG01 and SG02 will be rated at 20.9 MMBtu/hr., each, to be fired with natural gas or distillate fuel oil.

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 not** classified as one of the 28 listed source categories in the PSD regulation (i.e., 40 CFR 52.21). As such, the PSD major source threshold is 250 tpy of any NSR regulated pollutant (excluding GHG's as CO_2e). The potential emissions of CO, NOx, PM, total PM_{10}, and total $PM_{2.5}$ are less or equal to than 250 tpy, each.

The potential emissions of greenhouse gases (CO_2e) are less than 100,000 tpy.

The facility operates as a PSD Avoidance source for emissions of SO_2 from Boiler HB01 based on applicable restrictions on the combustion of residual fuel oil per 40 CFR 63 Subpart DDDDD (Boiler MACT) as part of Permit No. 2262-285-0045-V-04-0. As the facility is allowed to burn fuel oils in Boilers SG01, and SG02 only during natural gas curtailment so that the boilers (ID Nos. HB01, SG01, and SG02) are subject to only the Boiler MACT requirements for "Units designed to burn gas 1 fuels," the facility-wide SO2 potential-to-emit (PTE) will be lower than the PSD major source threshold.

The facility-wide potential emissions of VOCs equal or exceed 250 tons during any twelve-consecutive months when considering the potential VOC emissions from the Ranges (on a combined basis), from the Boilers, and any VOC emitting equipment specified in Attachment B of the Title V Permit. The facility requested their Title V Renewal Permit limit the potential VOC emissions from the facility such that the facility is a PSD minor source.

Potential VOC emissions from the Boilers HB01, SG01, and SG02, combined are 2.64 tpy (based on AP-42 emission factor for the combustion of natural gas at 8,760 hours per year). Potential VOC emissions from applicable equipment specified in Attachment B should be less than 2 tpy (on a conservative basis). Therefore, the PSD Avoidance limit on the ranges (on a combined basis) will be reduced from 249 tpy to 245 tpy so that the facility-wide potential VOC emissions are less than 250 tpy.

2. Title V Major Source Status by Pollutant

Table 2 illustrates the Title V major source status for the entire Title V site.

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			✓[1]
VOC	Yes	✓		
NO_x	Yes	✓		
CO	Yes			✓
TRS	--	--	--	--
H_2S	--	--	--	--
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

40 CFR 63 Subpart OOOO – "National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles" (NESHAP OOOO): NESHAP Subpart OOOO **applies** to the facility because the Title V site is a major source of emissions of HAPs and the Title V site operates fabric and other textile printing, coating, and dyeing operations. The U.S. EPA promulgated revisions to this NESHAP on March 15, 2019 and on November 19, 2020 both of which are after the effective date of the existing Title V permit for the facility. The Division reviewed the promulgated revisions to determine if any of the regulatory updates should be incorporated in the Title V Renewal Permit and the Division's findings are discussed in each subsequent narrative section.

40 CFR 63 Subpart ZZZZ – "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" [RICE NESHAP]: The facility operates one diesel-fired fire pump that is subject to NESHAP Subpart ZZZZ.

40 CFR 63 Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters"Boiler MACT: The Boiler MACT applies to the facility because the Title V site is a major source of emissions of HAPs and the Title V site operates one or more boilers which meet the definition of affected source. The U.S. EPA promulgated revisions to the Boiler MACT regulation on October 6, 2022 and this date is after the effective date of the existing Title V permit for the facility. The Division reviewed the promulgated revisions to determine if any of the regulatory updates should be incorporated in the Title V Renewal Permit. The Division reviewed the promulgated revisions

[1] The potential to emit is based on operating the Boiler (HB01) on residual fuel oil and Boilers SG01 and SG02 on distillate fuel oil less than 48 hours per year in each of these boilers.

to determine if any of the regulatory updates should be incorporated in the Title V Renewal Permit and the Division's findings are discussed in each subsequent narrative section.

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:

Not applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There is no compliance issues noted with this application.

D. Permit Conditions

Not applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
R001	Textile Finishing Range 1 This textile range is used for dyeing and finishing	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	WEP1	Wet Electrostatic Precipitator
R003	Textile Finishing/Coating Range 3 This textile range is used for fabric coating, dyeing, and application of finishing materials.	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-1-3-.02(2)(x) 40 CFR 60 Subpart A 40 CFR 60 Subpart VVV 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO		
R004	Textile Finishing Range 4 This textile range is used for dyeing and finishing	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO		
R005	Textile Finishing Range 5 This textile range is used for dyeing and finishing	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO		
R006	Textile Finishing /Coating Range 6 This textile range is used for fabric coating, dyeing, and application of finishing materials.	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-1-3-.02(2)(x) 40 CFR 60 Subpart A 40 CFR 60 Subpart VVV 40 CFR 63 Subpart A 40 CFR 63 Subpart OOOO	N/A	N/A
HB01	Cleaver Brooks Boiler 70 MMBtu/hr Natural gas	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	N/A	N/A
SG01	Boiler 20.9 MMBtu/hr Natural gas and/or distillate fuel oil	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	N/A	N/A
SG02	Boiler 20.9 MMBtu/hr Natural gas and/or distillate fuel oil	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	N/A	N/A

B. Equipment & Rule Applicability

The information in the following table is provided in order to aid the Division in its regulatory review for the Textile Ranges.

Range ID No.	Performs Coating?	Performs Printing?	Performs Dyeing?	Performs Finishing?	Other
R001			√	√	
R003	√-Note-A		√	√	
R004			√	√	
R005			√	√	√-Scouring
R006	√-Note B		√	√	√-Scouring

Note A-Knife coating applicator
Note B-Knife and rotogravure coating applicators

PSD Avoidance for VOC Emissions from the Ranges (on a combined basis): The facility is subject to an existing VOC emissions limit of 249 tons during any consecutive twelve months for the operation of the Ranges R001, R003, R004, R005, and R006, on a combined basis. This VOC emissions limit is reduced to 245 tons during any consecutive twelve months to consider VOC emissions from sources other than the ranges and safely limit the facility-wide potential VOC emissions to less than 250 tpy for PSD Avoidance status.

PSD Avoidance for SO_2 Emissions: The facility operates under a PSD Avoidance limit for SO_2 emissions from Boilers HB01, SG01, and SG02 through the requirement to operate the boilers as units designed to burn gas 1 fuels under the Boiler MACT regulation.

Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions": This state rule limits visible emissions from each non-fugitive emissions point comprising Ranges R001, R003, R004, R005, and R006 to less than forty percent, unless otherwise specified, because each Range is subject to an emission limitation under Georgia Rule 391-3-1-.02(2).

Georgia Rule 391-3-1-.02(2)(d) – "Fuel-Burning Equipment": The facility is subject to this state rule for the operation of Boilers HB01, SG01, and SG02. These Boilers were or will be constructed and installed at the facility after January 1, 1972. Therefore, this state rule limits PM and visible emissions from these boilers per Georgia Rule 391-3-1-.02(d)2.(ii) and 3.

ID No.	Allowable PM Emissions Limit (lb/MMBtu)	Allowable Fuels	PM Emissions Factor (AP-42) (lb/MMBtu)
HB01	0.189	Natural gas	0.00745 (NG)
SG01	0.345	Natural gas, propane, and distillate fuel oil	0.0143 (DFO) 0.00745 (NG)
SG02	0.345	Natural gas, propane, and distillate fuel oil	0.0143 (DFO) 0.00745 (NG)

When natural gas (NG) and distillate fuel oils (DFO) are burned, the AP-42 PM emission factors indicate that the GA Rule (d) PM emission limit is likely to be complied with; the GA Rule (d) visible emission (VE) limit is also expected to be complied with.

Georgia Rule 391-3-1-.02(2)(e)-"Particulate Emissions from Manufacturing Processes": This state rule limits particulate emissions from each non-fugitive emissions point comprising Ranges R001, R003, R004, R005, and R006 based on a process input weight rate rule. Note: The ovens in each range apply heat energy directly. Hence, the PM emissions from the dryers are regulated by Georgia Rule (e).

Range ID No.	Installation Date	Applicable Formula Legal Citation
R001	1956	Existing 391-3-1-.02(2)(e)1.(ii)
R003	1996	New 391-3-1-.02(2)(e)1.(i)
R004	1973	New 391-3-1-.02(2)(e)1.(i)
R005	1992	New 391-3-1-.02(2)(e)1.(i)
R006	1995	New 391-3-1-.02(2)(e)1.(i)

Georgia Rule 391-3-1-.02(2)(g) – "Sulfur Dioxide": This state rule limits the sulfur content of fuels combusted in fuel-burning sources operated by the facility to less than 2.5 weight percent. The following table summarizes this requirement:

Fuel-Burning Source	Fuel(s) Fired
Ovens/Tenter Frames on each Range	Natural gas and/or propane
Boiler HB01	Natural gas
Fire Pump	Diesel fuel
Boilers SG01 and SG02	Natural gas or distillate fuel oil

Georgia Rule 391-3-1-.02(2)(x) – "VOC Emissions from Fabric and Vinyl Coating": The facility applies materials that may be classified as coatings, dyes, finishes, and printing materials on the ranges, as applicable. The term coating as used in this state rule means the coating of a textile substrate with a knife, roll, or rotogravure coater to impart properties that are not initially present, such as strength, stability, water or acid repellency, or appearance. The application of dyes, finishes, and printing materials do not meet the definition of fabric coating per said rule.

This state rule applies to the coating operations on the textile finishing/coating ranges (ID Nos. R003 and R006) for the following reasons: (1) Potential VOC emissions from the facility exceed 100 tpy; and (2) The facility applies coating to fabrics in these ranges using knife coating and/or rotogravure coating methods, as defined in the rule. This rule limits VOC emissions from a fabric coating line to 2.9 lbs./gal of coating, excluding water, delivered to the coating applicator. If any coating delivered to the coating applicator contains more than 2.9 lbs. VOC per gallon, this rule limits VOC emissions

from a fabric coating line to the solids equivalent limit of 4.79 pounds VOC per gallon of coating solids delivered to the coating applicator. WOC emissions from Ranges R003 and R006 are not controlled. The Georgia Rule (x) emission limits shall be achieved by: (1) the application of low solvent coating technology where each and every coating meets the limit expressed in pounds VOC per gallon coating excluding water; or (2) the application of low solvent coating technology where the 24-hour weighted average of all coatings on a single coating line or operation meets the solids equivalent limit, expressed in pounds VOC per gallon of coating solids; averaging across lines is not allowed.

Georgia Rule 391-3-1-.02(2)(ff) – "Solvent Metal Cleaning": The facility is subject to Georgia Rule (ff) for the operation of the cold cleaner noted in Attachment B because the facility has potential emissions of VOCs greater than 100 tpy.

Georgia Rule 391-3-1-.02(2)(lll) – "NOx Emissions from Fuel-Burning Equipment": The facility is subject to Georgia Rule (lll) for the operation of Boilers SG01 and SG02 for the following reasons: (1) The facility is located in Troup County; (2) these boilers will be constructed after May 1, 1999; and (3) the maximum heat input is equal to or greater than 10 MMBtu/hr and less than or equal to 250 MMBtu/hr. The facility is not subject to Georgia Rule (lll) for the operation of Boiler HB01 since this boiler was constructed prior to May 1, 1999.

Georgia Rule (lll) limits the NOx emissions to less than or equal to 30 ppmv at 3% oxygen on a dry basis from May 1 to September 30th of each calendar year.

40 CFR 60 Subpart Dc – "Standards of Performance for Small, Industrial-Commercial-Institution Steam Generating Units" ("NSPS Dc"): Boiler HB01 **is not** subject to this regulation because it was manufactured prior to June 8, 1989. Boilers SG01 and SG02 will be subject to this regulation because they will be manufactured after June 8, 1989.

NSPS Dc limits the fuel oil sulfur content to less than 0.5 on a weight percent basis per 40 CFR 60.42c(d) since Boilers SG01 and SG02 are capable of firing distillate fuel oils. 40 CFR 60.48c(g)(2) requires record keeping of the monthly fuel consumption for the boilers.

40 CFR 60 Subpart VVV – "Standards of Performance for Polymeric Coating of Supporting Substrates Facilities" ["NSPS VVV"]: This regulation **applies** to the operation of the coating operations on Ranges R003 and R006 because of the following: (1) they apply polymeric coating on supporting substrates; and (2) they were constructed after the effective date of April 30, 1987. The usage of VOCs on these polymeric coating operations are limited to less than 95 Mega-grams (i.e., 104.7 tons), each, during any 12-month period. This usage limit prevents these polymeric coating operations from being subject to the VOC emissions standards of this NSPS.

Note: Although some of the applied finishing chemicals on Ranges R001, R003, R004, R005, and R006 are polymers, they are **not** an applied material which adheres to the fabric. Therefore, the inclusion of the application of finishing materials, in this case, are not regulated under NSPS VVV.

40 CFR 63 Subpart OOOO – "National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles" ("NESHAP OOOO"): NESHAP OOOO applies to the facility because the facility is permitted as a major source of individual and/or combined HAPs,

and they conduct printing, coating, dyeing, and/or finishing of fabrics and other textiles. The NESHAP OOOO applicability and emission limitations were not revised based on the 2019 and 2020 promulgated revisions to NESHAP OOOO.

Ranges R003 and R006 include the NESHAP OOOO subcategory of web coating and printing and these ranges operate on an un-controlled basis for emissions of HAPs. The regulated materials for this subcategory are the coating, printing, thinning and cleaning materials used in these ranges. The NESHAP OOOO emission limit for this subcategory remains as follows: no more than 0.12 kg of organic HAP per kg of solids applied for coating operations only, or printing operations only, or both coating and printing operations. The facility must include all regulated materials (as defined in 40 CFR 63.4371) used in each affected source when determining whether the organic HAP emission rate is equal to or less than 0.12 kg of organic HAP per kg of solids applied. To make this determination, the Permittee may use one of the compliance options allowed by NESHAP OOOO for un-controlled operations: (1) compliant material option (§63.4291(a)(1)); or (2) emission rate without add-on controls option (§63.4291(a)(2)).

Ranges R001, R003, R004, R005, and R006 include the NESHAP OOOO subcategory of dyeing and finishing and these ranges operate on an un-controlled basis for emissions of HAPs. The regulated materials for this subcategory are regulated materials for the dyeing and finishing materials used in these ranges. The NESHAP OOOO emission limit for this subcategory remains as follows: (1) no more than 0.016 kg of organic HAP per kg of dyeing materials applied for dyeing operations only; (2) no more than 0.0003 kg of organic HAP per kg of finishing materials applied for *finishing operations* only; and (3) no more than 0.016 kg organic HAP per kg of dyeing and finishing materials applied for both dyeing and finishing operations. The facility must include all regulated materials (as defined in 40 CFR 63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable numerical value. To make this determination, the Permittee may use one of the compliance options allowed by NESHAP OOOO for uncontrolled operations: (1) compliant material option (§63.4291(c)(1)); (2) emission rate without add-on controls option (40 CFR 63.4291(c)(2)); or (3) equivalent emission rate option (40 CFR 63.4291(c)(4)).

<u>40 CFR 63 Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants for Major Sources-Industrial, Commercial, and Institutional Boilers and Process Heaters" (Boiler MACT):</u> The B<u>oiler</u> MACT regulation applies to the facility because the facility is permitted as a major source of individual and/or combined HAPs, and they operate (or will operate) Boilers HB01, SG01, and/or SG02 which can be classified as an industrial, commercial, or institutional boiler as defined in 40 CFR 63.7575. The facility will remain subject to the existing requirement to operate Boiler HB01 as a *unit designed to burn gas 1 fuels* under 40 CFR 63.7499(l) (and defined in 40 CFR 63.7575). The facility will be required to operate Boilers SG01 and SG02 as *units designed to burn gas 1 fuels* under 40 CFR 63.7499(l). The facility is not subject to a Boiler MACT regulatory emission limit per Tables 2 and 15 nor a Boiler MACT operating limit per Tables 4 and 7 because Boilers HB01, SG01, and SG02 is (or will be) designated as a *unit designed to burn gas 1 fuels*.

The ovens on Textile Ranges R001, R003, R004, R005, and R006 are not classified as *process heaters* under 40 CFR 63.7575 because they transfer heat directly to the fabric.

There are no promulgated revisions to the Boiler MACT regulation regarding applicability nor emissions limitations that apply to the facility.

C. Permit Conditions

New Condition No.	Existing Condition No.	Purpose	Description
3.2.1	3.2.1	PSD Avoidance	**Modified** This Condition establishes PSD Avoidance limit for VOC emissions from Ranges R001, R003, R004, R005, and R006, combined, as less than 245 tons during any consecutive twelve-month period. The numerical value for the limit is revised from 249 tons to 245 tons so that the facility-wide limit is less than 250 tons.
3.2.2	3.2.2	Boiler MACT; PSD Avoidance; NSPS Dc; and GA Rule (g)	**Modified** This Condition clarifies that the facility must operate boilers HB01, SG01, and SG02 as *units designed to burn gas 1 subcategory* per the definition of *unit designed to burn gas 1 subcategory* as defined in 40 CFR 63.7575. Also, clarified the legal citations. The fuel specification limit also reduce the facility-wide SO2 emissions well below 250 tpy and includes the GA Rule (g) fuel sulfur content limit. The fuel specification limit also includes the NSPS Subpart Dc fuel oil sulfur content limit for Boilers SG01 and SG02.
3.3.1	3.3.1	NSPS A and VVV	**No Change** This Condition establishes NSPS Subparts A and VVV as applicable requirements for the operation of Ranges R003 and R006.
3.3.2	3.3.2	NSPS VVV	**No Change** This Condition establishes the limit of VOC usage for all applicable coating operations on Ranges R003 and R006, each, to less than 95 MG (or 104.70 tons) during any 12-consecutive month period. This emission limit prevents these coating operations from being subject to the VOC emission standard of NSPS VVV. Because of the usage limit, only the recordkeeping and reporting requirements of NSPS VVV apply.
3.3.3	3.3.3	NSPS VVV	**No Change** This Condition defines *VOC used* for the purposes of computing the actual mass of VOC used per Range R003 and R006 per NSPS VVV.

New Condition No.	Existing Condition No.	Purpose	Description
3.3.4	--	NSPS A and Dc	**New Condition** This Condition establishes NSPS Subparts A and Dc as applicable requirements for the construction and operation of Boilers SG01 and SG02.
3.3.6	3.3.4	NESHAP A and OOOO	**No Change** This Condition establishes NESHAP Subparts A and OOOO as applicable requirements for the operation of Ranges R001, R003, R004, R005, and R006.
3.3.7	3.3.5	NESHAP OOOO	**Modified** This Condition establishes the NESHAP OOOO requirements (web coating/printing*)* and compliance options for ranges R003 and R006. Typographical errors are corrected.
3.3.8	3.3.6	NESHAP OOOO	**Modified** This Condition establishes the NESHAP OOOO requirements (dyeing and finishing*)* and compliance options for ranges R001, R003, R004, R005, and R006. Redundant language is removed from the introductory text.
3.3.9	3.3.7	NESHAP OOOO	**Modified** The Condition language is updated to better match NESHAP OOOO (40 CFR 63.4291(c)). *Added language for 40 CFR 63.43291(c)(4).*
3.3.10	N/A	NESHAP OOOO	**New** This Condition establishes the operating scenario for any dyeing/finishing affected source per 40 CFR 63.4300(a)(4) as it pertains to the use of the *equivalent emission rate compliance option*.
3.3.11	3.3.8	Boiler MACT	**Modified** This Condition establishes NESHAP Subparts A and DDDDD as applicable requirements for operation of Boilers HB01, SG01, and SG02. Language referencing the date of January 31, 2016, is removed.
3.3.12	--	Boiler MACT	**New Condition** This Condition establishes the Boiler MACT regulatory requirement that the facility conduct the *initial tune-up* for Boilers SG01 and SG02 within 13 months of *initial startup* of each boiler.
--	3.3.9	Boiler MACT	**Deleted** This existing Condition is redundant with New Condition 5.2.2.
--	3.3.10	Boiler MACT	**Deleted** The Boiler MACT annual tune-up requirements are now included in Condition 5.2.2.
3.4.1	3.4.1	State Rule	**No Change** This Condition establishes the requirements of Georgia Rule (e) depending on whether the emission unit is classified as new or existing.

New Condition No.	Existing Condition No.	Purpose	Description
3.4.2	3.4.2	State Rule	**No Change** This Condition establishes the requirements of Georgia Rule (b).
3.4.3	3.4.3	State Rule	**Modified** This Condition establishes the requirements of Georgia Rule (g). The Georgia Rule (g) fuel sulfur content limit for Boiler HB01 is already included in Condition 3.2.2a.
3.4.4	3.4.4	State Rule	**Modified** This Condition establishes the requirements of Georgia Rule (d) for purposes of Boilers HB01. The condition is modified to include Boilers SG01 and SG02.
3.4.5	3.4.5	State Rule	**Modified** This Condition establishes the requirements of Georgia Rule (x) for ranges R003 and R006. The requirements of Georgia Rule 391-3-1-.02(2)(x)1.(iii) are added to the condition.
3.4.6	3.4.6	State Rule	**Modified** This Condition establishes the compliance options for Georgia Rule (x). Condition language is revised to better match the requirements of Georgia Rule (x). The applicable ranges operate on an uncontrolled basis for VOC emissions. Therefore, existing condition 3.4.6c. is not carried over to the updated Title V Renewal Permit.
3.4.7	--	State Rule	**New Condition** This Condition establishes the Georgia Rule (lll) NOx emission standard for Boilers SG01 and SG02.

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.

The revised NESHAP OOOO general testing requirements were updated based on the 2019 promulgated revision. The language in Existing Condition 4.1.4 is flexible enough to include these updated requirements.

B. Specific Testing Requirements

None applicable.

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

Ranges R001, R003, R004, R005, and R006 are subject to Georgia Rules 391-3-1-.02(2)(e), (b), and (g) for PM, visible emissions, and fuel sulfur content; and NESHAP OOOO for organic HAP content associated with applicable coating, printing, dyeing, and finishing materials.

Georgia Rule (g): The Ranges are considered fuel-burning sources capable of combusting natural gas and/or propane. The maximum anticipated fuel sulfur content of the natural gas and propane fuels is negligible. Thus, the likelihood of Georgia Rule (g) is minimal and no periodic monitoring for Georgia Rule (g) is prescribed.

Georgia Rule (e): The operation of the WESP is **not** required to provide for a reasonable assurance of compliance with Georgia Rule (e) based on the narrative for Permit No. 2262-285-0045-V-01-0 for the operation of Ranges R001, R003, R004, and R005. There is no change to this conclusion based on the submitted Title V Renewal Permit application.

Georgia Rule (b): Range R006 vents uncontrolled to the atmosphere. The Division determined that the operation of the WESP was not needed during operation of the said Range in Permit No. 2262-285-0045-V-02-2. This conclusion will not be revised at this time as part of the development of the Title V Renewal Permit.

Ranges R001, R003, R004, and R005 exhaust through a common WESP, WEP1. The facility employs this device to control particulate matter (mists/opacity) from the fabric dryers (or tenter frames) that are part of each range. The primary components of the PM emissions are condensable organic compounds and the facility does not take credit for the removal of these potential VOC components when verifying compliance with the facility-wide VOC PSD Avoidance emission limit.

The facility requests that the WESP be classified as a voluntary control device for purposes of providing a reasonable assurance of compliance with Georgia Rule (b) for Ranges R001, R003, R004, and R005. This request **is declined** by the Division because there is no Division-approved performance testing to support this claim by the facility. The existing Title V Permit for the facility will continue requiring the facility operate the WESP at all times of operation of the Ranges R001, R003, R004, and R005 to provide for a reasonable assurance of compliance with Georgia Rule (b).

The existing WESP includes a series of discharge electrodes which is the component that creates electrons that collide with the particles and applies the electrical charge to the particles in the incoming gas stream. The collection electrodes (typically called plates) provide the collection surfaces for the particles. The secondary voltage and amperage (of each WESP field) measures the voltage and current

applied to the discharge electrodes. The primary indicators of WESP performance, in this case, include secondary corona power, which is a product of secondary voltage (i.e., the voltage across the electrodes) and secondary current (i.e., the current to the electrodes). Note that the existing Title V permit did not include the secondary current monitoring. When secondary voltage is present without any secondary current, no charging of the particles and collection of such particles at the plates would occur. Therefore, the monitoring of secondary current is added into Condition 5.2.1c. to assure proper operation of the WESP.

Other indicators of performance for the WESP are the inlet gas temperature to the WESP (or the temperature of the gas stream at the outlet of the pre-quench chamber).[2]

The Division-approved temperature of the gas stream at the outlet of the pre-quench chamber is 141°F per the narrative for Permit No. 2262-285-0045-V-03-0.

The monitoring requirements for the existing WESP are updated as follows and serve to establish the monitoring and recording frequency during operation of Ranges R001, R003, R004, and/or R005 to provide for a reasonable assurance of compliance with Georgia Rule (b). These are included in **Conditions 5.2.1a. through c**. **New Condition 5.2.1d.** requires that the facility establish the minimum total secondary power for the WESP, and submit it to the Division for approval within 180 days of the permit issuance date.

Monitoring Parameter	**Frequency of Monitoring and Recording of WESP Requires the Installation, Calibration, Maintenance, and Operation of Monitoring Devices of the Following Parameters**	
	Existing	**Revision**
Secondary Voltage of each WESP field	At least 4 hours after each startup and every 8 hours afterwards while operating Ranges R001, R003, R004, and/or R005.	At least once every 15 minutes while operating Ranges R001, R003, R004, and/or R005. The data shall be reduced and recorded on a daily average.
Temperature of the gas stream at the outlet of the quench chamber	At least 4 hours after each startup and every 8 hours afterwards while operating Ranges R001, R003, R004, and/or R005.	No change.
Secondary Current of each WESP field.	N/A	Within 180 days of Permit Issuance, at least once every 15 minutes while operating Ranges R001, R003, R004, and/or R005. The data shall be reduced and recorded on a daily average.

NESHAP OOOO: The operation of the WESP (WEP1) is not required for compliance with the NESHAP OOOO requirements. Verification of compliance with the applicable NESHAP OOOO emissions limits is via recordkeeping as further discussed in Section VI of the narrative.

Boilers HB01, SG01, and SG02 are subject to Georgia Rule (d) for PM and visible emissions; Georgia Rule (g) for fuel sulfur content; Georgia Rule (lll) for NOx emissions; NSPS Dc for fuel oil sulfur

[2] Appendix B.2 Electrostatic Precipitators Review Draft April 2002

content; and the Boiler MACT regulation (to be operated as a *unit designed to burn 1 gas* subcategory boiler) for annual tune-ups.

Since Boiler HB01 is no longer capable of firing residual fuel oils, the daily VE check requirement in existing Condition 5.2.2 is no longer needed and is not included in the proposed Title V renewal permit.

Existing Condition 5.2.3 has been deleted since the facility must operate Boiler HB01 as a *unit designed to burn gas 1 fuels*.

Georgia Rule (g): Monitoring of the residual fuel oil sulfur content combusted in Boiler HB01 is tracked via recordkeeping as described in Section VI of this narrative. Monitoring of the distillate fuel oil sulfur content combusted in Boilers SG01 and SG02 is tracked via recordkeeping as described in Section VI of this narrative.

Georgia Rule (lll): The facility is subject to Georgia Rule (lll) for the operation of Boilers SG01 and SG02. The Division's *Procedures for Testing and Monitoring Air Pollutants* (hereinafter "PTM") Section 2.119(b) establishes the periodic monitoring of NOx emissions from said boilers in order to provide for a reasonable assurance of compliance. The facility will be required to conduct a tune-up to demonstrate that the NOx concentrations of the emissions are below 30 ppmv corrected to 3% oxygen. The tune-up procedures and timing are prescribed in PTM Section 2.119(b) and included in **new Condition 5.2.4**.

NSPS Dc: The facility is subject to a fuel sulfur content limit for the combustion of distillate fuel oil in Boilers SG01 and SG02. The monitoring of the distillate fuel oil sulfur content combusted in Boilers SG01 and SG02 is tracked via recordkeeping as described in Section VI of this narrative.

Boiler MACT: The B*oiler* MACT regulation requires the facility to conduct annual tune-ups according to the procedures specified in 40 CFR 63.7540(a)(10) at least once every 12 months for the operation of Boilers HB01, SG01, and SG02. The *initial-tune-up* of Boilers SG01 and SG02 shall take place within 180 days of *initial-startup* of said boilers. The facility will not be required to conduct an *energy assessment* on Boilers SG01 and SG02 because they will be classified as *new* affected sources. The annual tune-up requirements are included in **new Condition 5.2.2**.

New Condition 5.2.3 contains the requirements specified in 40 CFR 63.7540(a)(13).

There are no promulgated revisions to the Boiler MACT regulation as it pertains to monitoring.

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant. [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]

- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

Operation of the WESP: The operation of the WESP is not required to demonstrate compliance with the emission limits established per Georgia Rule (e), NESHAP OOOO, and PSD Avoidance. The facility does not operate any air pollution control devices other than the WESP. Therefore, CAM is not an applicable requirement for the operation of the Ranges R001, R003, R004, and/or R005.

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.

B. Specific Record Keeping and Reporting 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.

New Condition No.	Existing Condition No.	Description
6.1.7b.i.	6.1.7b.i.	**Modified** This Condition establishes the exceedance definition associated with the PSD Avoidance VOC emissions limit for the Ranges on a combined basis. The numerical value is revised from 249 tons to 245 tons.
6.1.7b.ii.	6.1.7b.ii.	**No Change** This Condition establishes the exceedance definition is associated with the VOC usage limit for Ranges R003 and R006, each, per NSPS VVV.
6.1.7b.iii.	6.1.7b.iii.	**No Change** This Condition establishes the exceedance definition associated with Georgia Rule (x) as it pertains to the coating operations on Ranges R003 and R006.
6.1.7b.iv.	6.1.7b.xii.	**Modified** This Condition establishes the exceedance definition associated with the combustion of natural gas only in Boiler HB01.
6.1.7b.v.	--	**New Condition** This Condition establishes the exceedance definition associated with the combustion of distillate fuel oil with NSPS Dc as it pertains to the operation of Boilers SG01 and SG02.
6.1.7b.vi.	6.1.7b.iv.	**Modified** This Condition establishes the exceedance definition associated with the NESHAP OOOO Compliant Material Option for the use of any coating or printing material on any applicable web coating and printing operations. The phrase coating and printing operations is revised to read as web coating and printing operations.

New Condition No.	Existing Condition No.	Description
6.1.7b.vii.	6.1.7b.v.	**Modified** This Condition establishes the exceedance definition associated with the NESHAP OOOO Emission Rate Without Add-On Control compliance option of the Emission Rate Without Add-On Controls option for the use of any coating or printing material on any applicable web coating and printing operations. The phrase coating and printing operations is revised to read as web coating and printing operations.
--	6.1.7b.vi.	**Deleted** This existing Condition is deleted because the facility does not utilize the NESHAP OOOO organic HAP overall control efficiency compliance option for any applicable web coating and printing operations.
6.1.7b.viii.	6.1.7b.vii.	**No Change** This Condition establishes the exceedance definition associated with the NESHAP OOOO Compliant Material Option for the use of any dyeing or finishing material on any applicable dyeing and finishing operations.
6.1.7b.ix.	6.1.7b.viii.	**No Change** This Condition establishes the exceedance definition associated with the NESHAP OOOO Emission Rate Without Add-On Controls Option compliance determination method of any dyeing or finishing material on any applicable dyeing and finishing operations.
6.1.7b.x. 6.1.7b.xi. 6.1.7b.xii.	6.1.7b.ix. 6.1.7b.x. 6.1.7b.xi.	**No Change** These Conditions established the exceedance definitions associated with the NESHAP OOOO *Equivalent Emission Rate Option* compliance determination option for the applicable dyeing and finishing operations.
6.1.7c.i.	6.1.7c.i.	**Modified** This Condition is modified so the excursion reporting for the secondary voltage will cease when it is replaced by the excursion reporting for the secondary power in new Condition 6.1.7c.ii.
6.1.7c.ii.	--	**New** This Condition defines an excursion as any daily average total secondary power of said WESP that is below the established daily average total power the operation of the said WESP as approved by the Division
6.1.7c.iii.	6.1.7c.ii.	**No change** This Condition defines an excursion as any daily average outlet gas quench chamber temperature, per Condition 5.2.1b., that is greater than the established temperature value for said WESP.
--	6.1.7c.iii	**Deleted** This excursion definition of visible emissions check is no longer needed because the daily VE check requirement in existing Condition 5.2.2 is not included in this permit.

New Condition No.	Existing Condition No.	Description
--	6.1.7d.i.	**Deleted** This existing condition tracks compliance with Existing Condition 6.2.8. This condition is not carried over to the Title V Renewal Permit since the initial reporting requirements in existing Condition 6.2.8 has been satisfied and are no longer included in this TV renewal permit.
6.1.7d.i.	6.1.7d.iii.	**Modified** This Condition requires the facility notify the Division of failure to comply with the applicable Boiler MACT work practice standards and to note such failure in the semiannual reporting requirements. This Condition is modified for clarity purposes.
6.1.7d.ii.	---	**New Condition** This Condition requires the facility notify the Division of failure to comply with the applicable PTM Section 2.119 tune-ups requirements and to note such failure in the semiannual reporting requirements.
6.1.7b.iii.	---	**New Condition**This Condition requires the facility submit the actual consecutive twelve-month total VOC emissions (in tons) from Ranges R001, R003, R004, R005, and R006, combined, for each month in the semiannual reporting time frame noted in Condition 6.1.4.

Verification of Compliance with PSD Avoidance Limit for VOC Emissions

New Condition No.	Existing Condition No.	Description
6.2.1	6.2.1	**No Change** This Condition requires recordkeeping associated with the monthly usage records of all materials containing VOC used in the ranges.
6.2.2 6.2.3	6.2.2 6.2.3	**Modified** This Condition is modified to update the permit language associated with the computation of actual VOC emissions, on a combined basis, from the ranges for purposes of tracking compliance with the PSD Avoidance VOC Emissions limit. The reporting threshold have been updated, too.
--	6.2.4	**Deleted** This existing Condition is replaced with New Condition 6.1.7.d.iii.

NSPS VVV Recordkeeping and Reporting Requirements

New Condition No.	Existing Condition No.	Description
6.2.4	6.2.5	**Modified** This condition requires the facility to determine and record the monthly mass of VOC used in Ranges R003 and R006, each. The condition language has been modified for clarity purposes.
6.2.5	6.2.6	**Modified** This condition requires the facility to determine and record the monthly mass of VOC used in Ranges R003 and R006, each, on a consecutive twelve-month basis. The condition language has been modified for clarity purposes.
6.2.6	6.2.7	**Modified** This condition requires the facility to determine and record semiannual estimates of the annual amount of VOC used in Ranges R003 and R006, each on a semiannual basis. Existing Condition 6.2.7.b. is deleted as it is redundant with New Condition 6.2.6.
6.2.7.a.	6.2.8.a.	**Modified** This condition requires the facility notify the Division of the first estimate in which the projected annual VOC usage for either of the Ranges R003 and R006 equal or exceeds 95 Mg on an annual basis within 30 days of such estimate. The condition language has been modified for clarity purposes.
6.2.7.b.	6.2.8.b.	**Modified** This condition requires the facility to notify the Division within 30 days of occurrence, of the first consecutive twelve-month total of *VOC used* which equal or exceeds 95 Mg. The condition language has been modified for updating the referenced condition.

WESP Monitoring Recordkeeping Requirements

New Condition No.	Existing Condition No.	Description
--	6.2.9	**Deleted** This existing condition is redundant with New Condition 5.2.1.
6.2.8	--	**New Condition** This Condition requires the facility determine and record the daily averaged total secondary power input to the WESP using the stated formula.

Verification of Compliance with Georgia Rule 391-3-1-.02(2)(x)

New Condition No.	Existing Condition No.	Description
6.2.9	--	**New Condition** This Condition requires the facility to maintain records and supporting calculations to demonstrate compliance with Condition 3.4.5 per the Compliance Options in Condition 3.4.6.

Verification of Compliance with Georgia Rule (g) for Residual Fuel Oil Combustion

New Condition No.	Existing Condition No.	Description
--	6.2.15	**Deleted.** The residual fuel oil sulfur content record keeping requirements are no longer needed because the residual fuel oil system onsite is fully disabled.

NSPS Dc Recordkeeping, Notification, and Reporting Requirements

New Condition No.	Existing Condition No.	Description
6.2.10	--	**New Condition** This Condition establishes the NSPS Subparts A and Dc notification requirements as they pertain to Boilers SG01 and SG02.
6.2.11	--	**New Condition** This Condition establishes the requirement for the facility to obtain certifications from the supplier that the distillate fuel oil meets the fuel sulfur limit specified in Condition 3.3.2b.
6.2.12	--	**New Condition** This Condition contains the monthly fuel consumption record keeping requirements specified in 40 CFR 60.48c(g)(2).

NESHAP OOOO Recordkeeping, Notification, and Reporting Requirements

The promulgated revisions to 40 CFR 63.4310(b) [Initial Notification Requirements] and 40 CFR 63.4310 [Notification of Compliance Status] do not need to be incorporated in the Title V Renewal Permit because the facility has complied with these requirements prior to the promulgation of these revisions.

The promulgated revisions associated with the operation of add-on controls as part of the NESHAP OOOO compliance demonstration do not need to be incorporated in the Title V Renewal Permit because the facility operates on an uncontrolled basis for purposes of NESHAP OOOO compliance.

New Condition No.	Existing Condition No.	Purpose	Description
--	6.2.10a.i.(1)	§63.4311(a)(1)	**Deleted** The date for the submitting the first semiannual compliance report has passed and the facility has complied with this requirement. Therefore, this condition is deleted.
6.2.13.ai.	6.2.10a.i.(2)	§63.4311(a)(1)	**Modified** This condition was modified for clarity purposes.
6.2.13.aii.	6.2.10a.i.(3)	§63.4311(a)(1)	**Modified** This condition was modified for clarity purposes.
--	6.2.10a.i.(4)	§63.4311(a)(1)	**Deleted** This condition is redundant with Subparagraphs a.i. and a.ii. of said condition.
6.2.13b.	6.2.10a.ii.	§63.4311(a)(2)	**No Change** This condition is carried over to the Title V Renewal Permit as it pertains to inclusion with Title V report.
6.2.13c.	6.2.10a.iii.	§63.4311(a)(3)	**Modified** Subparagraph c.v. has been updated for clarity purposes.
6.2.13d.	--	§63.4311(a)(4)	**New Condition** This condition defines the semiannual compliance report content requirements when there are no deviations from the applicable organic HAP content requirements in Tables 3.3.7-1 and 3.3.8-1.
6.2.13e.	6.2.10a.iv	§63.4311(a)(5)(ii)	**Modified** Subparagraph e.v. is added based on the 2019 promulgated revisions to NESHAP OOOO.
6.2.13f.	6.2.10a.v.	§63.4311(a)(6)	**Modified** Subparagraph f.iv. is added based on the 2019 promulgated revisions to NESHAP OOOO.
6.2.13g.	6.2.10a.vi.	§63.4311(a)(6)	**No Change** This condition defines the semiannual compliance report content requirements for deviations associated with the *Equivalent Emission Rate Option*.
6.2.14	--	§63.4311(f)	**New Condition** This condition establishes the electronic reporting requirements associated with the submittal of the NESHAP OOOO semiannual compliance reporting requirements.
6.2.15a.	6.2.11a.	§63.4312(a)	**No Change** The existing recordkeeping requirements established by the stated legal citation do not need to be modified.
6.2.15b.	6.2.11b.	§63.4312(b)	**No Change** The existing recordkeeping requirements established by the stated legal citation do not need to be modified.

New Condition No.	Existing Condition No.	Purpose	Description
6.2.15c.i.	6.2.11c.i.	§63.4312(c)	**Modified** Subparagraph c.i.(C). is added for completion purposes of the applicable NESHAP OOOO requirements.
6.2.15c.ii.	6.2.11c.ii.	§63.4312(c)	**No Change** The existing recordkeeping requirements established by the stated legal citation do not need to be modified.
6.2.15d. 6.2.15e. 6.2.15f. 6.2.15g. 6.2.15h.	6.2.11d. 6.2.11e. 6.2.11f. 6.2.11g. 6.2.11h.	§63.4312(d) §63.4312(e) §63.4312(f) §63.4312(g) §63.4312(h)	**No Change** The existing recordkeeping requirements established by the stated legal citations do not need to be modified.
6.2.15i.	6.2.11i.	§63.4312(i)	**Modified** Paragraph I was modified based on the 2019 promulgated revisions to NESHAP OOOO.
6.2.16	6.2.12	§63.4313	**Modified** This condition is modified to incorporate the promulgated revisions in 2019-2020 as it pertains to electronic recordkeeping.
6.2.17a.	6.2.13a.	§63.4322	**Modified** This Condition is modified to include the updated references to condition numbers.
6.2.17b.	6.2.13b.	§63.4322	**Modified** This Condition is modified to include the updated references to condition numbers.
6.2.17c.	6.2.13c.	§63.4322	**Modified** This Condition establishes the recordkeeping requirements for use of the NESHAP Compliant Material Option with updated references to condition numbers.
6.2.17d.	6.2.13d.	§63.4322	**Modified** This Condition is modified to include updated references to condition numbers.
6.2.18a.	6.2.14a.	§63.4332	**Modified** This Condition is modified to include the updated references to condition numbers.
6.2.18b.	6.2.14b.	§63.4332	**Modified** This Condition is modified to include the updated references to condition numbers.
6.2.18c.	6.2.14c.	§63.4332	**Modified** This Condition is modified to include the updated references to condition numbers.
6.2.18d.	6.2.14d.	§63.4332	**Modified** This Condition is modified to include updated references to condition numbers.

40 CFR 63 Subpart DDDDD Recordkeeping, Notification, and Reporting Requirements

New Condition No.	Existing Condition No.	Purpose	Description
6.2.19	6.2.16	§63.7545(a)	**Modified** This Condition establishes the recordkeeping requirements. The condition language has been modified for clarity purposes.
--	6.2.17	§63.7545(e) §63.9(h)(2)(ii) §63.10(d)(2)	**Deleted** The facility has complied with the one-time requirement to prepare and submit a Notification of Compliance Status. *An NOC does not need to be submitted for Boilers SG01 and SG02 because these boilers are not subject to an emission limitation in Tables 2 or 15 nor an operating limit in Table 4.*
6.2.20	6.2.18	§63.7545(f)	**Modified** This Condition establishes the notification requirement associated with use of an alternative fuel in an affected source subject to the Boiler MACT. The condition language has been modified for clarity purposes.
6.2.21	6.2.19	§63.7545(h)	**Modified** This Condition establishes the notification requirement associated with use of an alternative fuel in an affected source subject to the Boiler MACT. The condition language has been modified for clarity purposes.
6.2.22	6.2.20 6.2.21 6.2.22	§63.7550(a) §63.7550(b) §63.7550(c)(1) §63.7550(c)(5)(i)-(iii), (xiv), and (xvii)	**Modified-Consolidated** These existing requirements are consolidated into one Condition for purposes of requiring the submission of an annual compliance report, per the Boiler MACT, along with the report contents.
6.2.23	6.2.23	§63.7550(h)(3)	**Modified** This Condition updates the requirements of this legal citation per promulgated revision to the Boiler MACT.
6.2.24	6.2.24	§63.7555(a)	**Modified** This Condition establishes the recordkeeping requirements per 40 CFR 63.7555(a). The phrase "semi" is removed since the facility is only subject to annual compliance reporting for the Boiler MACT .
6.2.25	6.2.25	§63.7555(h)	**No Change** This Condition establishes the recordkeeping requirements associated with 40 CFR 63.7555(h).
--	6.2.26	§63.7555(i) and(j)	**Deleted** The existing Condition pertains to the requirements of 40 CFR 63.7555(i) and (j). These regulatory citations

New Condition No.	Existing Condition No.	Purpose	Description
			were deleted in the Boiler MACT promulgated revisions.
6.2.26	6.2.27	§63.7560	**No Change** This Condition establishes the recordkeeping requirements per 40 CFR 63.7560.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

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 applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

The facility has indicated that they operate air conditioners or refrigeration equipment that uses CFC's, HFC's, or other stratospheric ozone-depleting substances listed in 40 CFR Part 82 (Subpart A and Appendices A and B). Therefore, the facility is subject to Title VI of the 1990 Clean Air Act Amendments and 40 CFR 82 Subpart F. Note that the applicable equipment does not contain a refrigerant charge of greater than 50 pounds.

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.//