

Facility Name: **Nichiha USA, Inc. – Macon Cement Fiberboard Plant**  
City: Macon  
County: Bibb  
AIRS #: 04-13-021-00209

Application #: TV-725893  
Date Application Received: March 8, 2023  
Permit No: 3272-021-0209-V-06-0

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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: Nichiha USA, Inc. – Macon Cement Fiberboard Plant
2. Parent/Holding Company Name: Nichiha Inc.
3. Previous and/or Other Name(s)

None.

4. Facility Location

3150 Avondale Mill Road, Macon, Georgia 31216 (Bibb County)

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

This facility is located in an attainment area.

### B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

### C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3272-021-0209-E-05-0	June 28, 2019	Transition operating permit issued to a new Title V source

### D. Process Description

1. SIC Codes(s)

3272 - Concrete Products, Except Block and Brick

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)

Cement fiberboards

3. Overall Facility Process Description

The facility processes cement, fly ash, pulp, binder material, mica, and silica, which are delivered by rail or truck. The materials are transported via belt conveyors and pneumatic conveyance to a weighing hopper and mixer. The material from the mixer is conveyed to one of two forming lines where the material is pressed and cured to produce cement fiberboard. Then various coatings are applied to the cement fiberboard via brushing and spraying. After necessary trimming and drying, the painted cement fiberboards become final products. Fuel combustion sources at the existing facility include several boilers, preheaters, and paint dryers. All are small size units and burn natural gas exclusively. In addition, hydrochloric acid (HCl) is being diluted to 7% wt. concentration for cleaning of the forming lines and for use in the onsite wastewater treatment facility.

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 a major source of criteria pollutants under relevant PSD/NSR regulations because of the existing 249 tons per year facility-wide VOC emission limit.

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 <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes	✓		
NO <sub>x</sub>	Yes			✓

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
CO	Yes			✓
TRS	n/a			
H <sub>2</sub> S	n/a			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

### 3. MACT Standards

The facility is not a major source of hazardous pollutants under relevant MACT regulations because of existing 10/25 tons per year (tpy) facility-wide HAP emission limits.

These 10/25 tpy HAP emission limits ensure that the facility remain an “area/minor” source and thus allow boilers to avoid being subject to 40 CFR Part 63, Subpart DDDDD, “*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.*”

Since all the existing boilers at this facility are only capable of burning natural gas, they are all exempt from 40 CFR Part 63, Subpart JJJJJ - “*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.*”

### 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:

The 249 tons per year VOC and 10/25 tons per year HAP emission limits allow this facility to remain a minor source under pertinent NSR/PSD and a minor/area source under relevant NESHAP/40 CFR Part 63 rules. The facility shall demonstrate compliance with these emission limits via mass balance calculations.

#### B. Applicable Rules and Regulations

Not applicable.

#### C. Compliance Status

Title V Permit Application No. TV-725893 does not indicate that the facility is operating out of compliance with the rules and regulations.

#### D. Permit Conditions

Conditions 2.7 and 2.8 in the current permit No. 3272-021-0209-E-05-0 were carried over into this draft permit as Conditions 2.1.1 and 2.1.2. The 249 tons per year facility-wide VOC emission limit in Condition 2.1.1 allows this facility to remain as a minor source under applicable NSR/PSD rules. The 10/25 tons per year HAP emission limits in Condition 2.1.2 allow the facility to remain as an “area/minor” source under NESHAP/40 CFR Part 63, Subparts DDDDD and JJJJJ. The Permittee shall demonstrate compliance with these emission limits/caps via monthly mass balance calculations.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Applicable Requirement/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
S111	260 m <sup>3</sup> Cement Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F111	Cement Silo Baghouse
H311	Cement Hopper		F311	Cement Hopper Baghouse
H312	Cement Weighing Hopper		F312	Cement Weighing Hopper Baghouse
S121	260 m <sup>3</sup> Fly Ash Silo No.1	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F121	Fly Ash Silo No. 1 Baghouse
S122	260 m <sup>3</sup> Fly Ash Silo No.2	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F122	Fly Ash Silo No. 2 Baghouse
S131	Fly Ash Silo No. 3	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F131	Fly Ash Silo No. 3 Baghouse
H121	Fly Ash Hopper No. 1	391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	F126	Fly Ash Hopper No. 1 Baghouse
H165	Hopper for Particulate from Board Cutting	391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	F165	Board Cutting Hopper Baghouse
M121	Ball Mill for Silica or Fly Ash	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F125	Fly Ash Ball Mill No. 1 Baghouse
H331	Fly Ash Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F331	Fly Ash Hopper No. 1 Baghouse
H332	Fly Ash Weighing Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F332	Fly Ash Weighing Hopper No. 2 Fabric Filtration Bag Sock
H321	Fly Ash Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F321	Fly Ash Hopper No. 2 Baghouse
H322	Fly Ash Weigh Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F322	Fly Ash Weighing Hopper No. 2 Fabric Filtration Bag Sock
S141	90 m <sup>3</sup> Silo for Mica, Fly Ash or Calcium Carbonate	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F141	Calcium Carbonate Silo No. 3 Baghouse
H341	Mica Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F341	Mica Hopper Baghouse
H342	Mica Weighing Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F342	Mica Weighing Hopper Fabric Filtration Bag
H351	Calcium Carbonate Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F351	Calcium Carbonate Hopper Baghouse
H352	Calcium Carbonate Weighing Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F352	Calcium Carbonate Weighing Hopper Filter
M201	Cellulose or Newsprint Pulper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
M161	Reject Product Crusher/Hammer Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F163	Reject Crusher Baghouse
M162	Reject Hammer Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F160	Reject Hammer Mill Baghouse
S161	90 m <sup>3</sup> Silo for Pulverized Reject Material	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F161	Reject Silo Baghouse

Emission Units		Applicable Requirement/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
H361	Hopper for Pulverized Reject Material	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F361	Reject Hopper Baghouse
H362	Weighing Hopper for Pulverized Reject Material	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F362	Reject Weighing Hopper Filter
M301	23 m <sup>3</sup> Wet Mixers	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
T781	35% HCl Tank	391-3-1-.02(2)(b)	WS01	HCl Tank No. 1 Scrubber
T782	7% HCl Tank			
T783	7% HCl Tank			
C164	Product Cutting Saw Room Enclosure	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F164	Product Cutting Dry Baghouse
B801	Boiler 1 (12.55 MMBtu/hr. Natural Gas Fired)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR Part 60, Subpart Dc	--	--
B802	Boiler 2 (12.55 MMBtu/hr. Natural Gas Fired)			
B803	Boiler 3 (12.55 MMBtu/hr. Natural Gas Fired)			
B804	Boiler 4 (12.55 MMBtu/hr. Natural Gas Fired)			
C802	Product Cutting Saw	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F802	Soffit Press Baghouse
P701	Press Machine	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F701	Soffit Press Baghouse
400A/B	Primer Brushing Machine	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) Avoidance of 40 CFR 52.21	--	--
600A/B	Primer Brushing Painting			
SC1	Nichi-Guard Coating			
CS1	Length Cutting Saw	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CBH1	Baghouse
CS2	Bevel Cutting Saw			
CS3	Glue and Edge Saw			
CS4	Chamfering Machine			
SB1	Paint Spray Booth No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
SB2	Paint Spray Booth No. 2			
SB3	Paint Spray Booth No. 3			
SB4	Paint Spray Booth No. 4			
S211	Cement Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F211	Cement Silo Bag Filter
S221	Silica Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F221	Silica Silo Bag Filter
S231	Mica Silo		F231	Mica Silo Bag Filter
S241	Reject Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F241	Reject Silo Bag Filter
M401	Face Layer Mixer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F311	Mixer Dust Collector
M402	Core Layer Mixer			
H401	Dumping Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--

Emission Units		Applicable Requirement/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
H402	Weighing Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
H403	Weighing Conveyor			
H404	Weighing Conveyor			
PB	Precut Board	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F313	Precut Dust Collector
UB	Unload Robot		F312	Unloader Dust Collector
MLT1	1 <sup>st</sup> Multisizer		F314	1 <sup>st</sup> Multisizer Dust Collector
MLT2	2 <sup>nd</sup> Multisizer		F315	2 <sup>nd</sup> Multisizer Dust Collector
SSSC	Shortside Tenoner	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F316	Cutting Dust Collector No. 2
LSSC	Longside Tenoner			
CDBF	Cutting Dust BF Silo	391-3-1-.02(2)(b)	F317	Cutting Dust Bag Filter
FDBF	Foaming Dust BF Silo	391-3-1-.02(2)(e)	F318	Forming Dust Bag Filter
RC	Recycle Crusher No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F319	Recycle Dust Collector
RBC3	Recycle BC3 Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
SFH	Sludge Flake Hopper			
SFBC	Sludge Flake BC Conveyor			
RBF	Recycle BF Silo	391-3-1-.02(2)(b)	F320	Recycle Bag Filter
DBF	Dust BK Silo	391-3-1-.02(2)(e)	F321	Baghouse
F323	Rough Flake BF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F323	Fabric Filter
F324	F Flake BF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F324	Fabric Filter
F325	C Flake BF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F325	Fabric Filter
F326	F-BF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F326	Fabric Filter
TCR1	Top Roll Coater No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) Avoidance of 40 CFR 52.21	--	--
TCR2	Top Roll Coater No. 2			
UP1	Inkjet Paint Machine No. 1			
UP2	Inkjet Paint Machine No. 2	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR Part 60, Subpart Dc	--	--
B805	12.55 MMBtu/hr Natural Gas-Fired Boiler			
B806	12.55 MMBtu/hr Natural Gas-Fired Boiler			
B807	12.55 MMBtu/hr Natural Gas-Fired Boiler			
B808	12.55 MMBtu/hr Natural Gas-Fired Boiler			
V200	Floor Vacuum Unit for the Mixing Area	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F200	Mixing Area Floor Vacuum Cleaning Baghouse
F001	Transfer to Mixer from Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
D400	400 Second Coat Dryer	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	--	--
D600	600 Finish Dryer			



Emission Units		Applicable Requirement/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
D200	200 Backside Dryer			
D300	300 First Coat Dryer			
D500	500 Topcoat Dryer			
D100	100 Preheat Dryer			
F002	Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
F003	BC Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
DR4	Product Drying After Painting	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	--	--
DR3	Product Drying After Painting			
DR2	Product Drying After Painting			
DR1	Product Drying After Painting			
PDR3	Product Heating	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	--	--
PDR2	Product Heating			
PDR1	Product Heating			
C322	Flake CY	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F327	Fabric Filter
1SP	Base Coat Longside Paint Booth	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
2SP	Base Coat Shortside Paint Booth			
4SP	Backside Sealer Paint Spray			
5SP	1 <sup>st</sup> Coat Longside Paint Booth			
6SP	1 <sup>st</sup> Coat Shortside Paint Spray			
7SP	2 <sup>nd</sup> Coat Shortside Paint Spray			
8SP	2 <sup>nd</sup> Coat Shortside Paint Spray			
10SP	Top Clear Multi Spray			
11SP	Micro Guard Spray	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	--	--
417RC	2 <sup>nd</sup> Coat Roll Coater			
FCVP	1 <sup>st</sup> Coat Vacuum Paint Machine			
SPP2	Shaped Part Paint Spray			
BSPC	Backside Paint Roller Coater			

\*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

### Emission and Operating Caps:

Condition 3.2.1 (Condition 2.6 in the current permit No. 3272-021-0209-E-05-0) requires the Permittee to burn only natural gas, propane and/or liquefied petroleum gas (LPG) in boilers and paint dryers at this facility. This operating limit allows these fuel burning units to qualify as “gaseous fuel-fired boilers” and thus to avoid emission and operating requirements under both NSPS and NESHAP

rules, as long as they are operated as gaseous fuel-fired boilers as specified in relevant rules and keep fuel usage records.

#### Rules and Regulations Assessment:

PM and visible emissions from processing units/sources, except boilers and indirect-heating heaters and dryers, are subject to the applicable PM and visible emission limits under Georgia Rules (e) and (b). To comply with the applicable PM and visible emissions limits under both rules, the facility is using baghouses where feasible to control the PM and visible emissions.

PM and visible emissions from indirect-heating heaters, dryers and boilers are subject to the applicable PM and visible emission limits under Georgia Rule (d). Burning only extremely clean fuels for emissions, i.e., natural gas, propane and/or liquefied petroleum gas (LPG), these fuel burning units are expected to be in compliance with Rule (d).

Fuels burned by all fuel burning units at this facility are subject to the sulfur content limit of Georgia Rule (g). These fuel burning units are expected to be in compliance with Rule (g), since they are required to burn only natural gas, propane and/or liquefied petroleum gas (LPG) whose sulfur contents are substantially below that limited by Rule (g).

Since silica and mica are being used as raw materials at this facility, any production equipment that processes and handles raw silica and/or mica or materials containing more than 50% silica and/or mica is subject to 40 CFR Part 60, Subpart OOO, “*Standards of Performance for Nonmetallic Mineral Processing*”. NSPS Subpart OOO has different visible and PM emission standards for different affected process units, depending on the construction, modification and/or reconstruction date of the affected process units. And these standards are more stringent than those in Rules (b) and (e). Because the silica silo (S221) and mica silo (S231) each have a baghouse (F221 and F231) for PM emission control, per 40 CFR 60.672(f), both silos are exempt from the applicable stack PM concentration limit (and associated performance testing) in Table 2 of Subpart OOO, but these silos must meet the applicable stack opacity limit and compliance requirements in the same table.

Gaseous fuel-fired Boiler B801 through B808 are subject to the applicable general requirements under 40 CFR Part 60, Subpart A, and the fuel usage recordkeeping requirement under 40 CFR Part 60, Subpart Dc.

When installing and operating diesel-powered generators/engines, the Permittee shall comply with the applicable provisions as specified in Table 8 to 40 CFR 63 Subpart ZZZZ, “*National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)*.”

#### C. Permit Conditions

Condition 2.6 in the current permit No. 3272-021-0209-E-05-0 was carried over into this draft permit and renumbered as Condition 3.2.1. This condition requires the Permittee to burn only natural gas, propane and/or liquefied petroleum gas (LPG) in boilers and paint dryers at this facility. This operating limit allows these fuel burning units to qualify as “gaseous fuel-fired boilers” and thus to avoid emission and operating requirements under both NSPS Subpart Dc and NESHAP Subpart JJJJJ,

as long as they are operated as gaseous fuel-fired boilers as specified in these rules and keep fuel usage records.

Condition 2.9 in the current permit was carried over into this draft permit and renumbered and modified as Condition 3.3.1. The reference to 40 CFR Part 60, Subpart A in Condition 2.9 was eliminated because Condition 3.3.3 was created to incorporate 40 CFR Part 60, Subpart A, which is applicable to any emission source subject to a NSPS standard. This condition requires the Permittee to comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart Dc, “*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*,” for the operation of the Boiler B801 thru B808. The fuel usage limitation in Condition 3.2.1 allows these boilers to avoid emission and operating requirements under NSPS Subpart Dc, except for keeping fuel usage records.

Condition 2.2 in the current permit was carried over into this draft permit and renumbered as Condition 3.3.2. This condition incorporates applicable emission limits/requirements of NSPS Subpart OOO as amended April 28, 2009.

Condition 3.3.3 was added to denote NSPS Subpart A. Any sources subject to a NSPS standard shall comply with applicable requirements/provisions of Subpart A, including notification, record keeping and testing, if applicable.

Conditions 2.3 and 2.5 in the current permit were carried over into this draft permit and renumbered Conditions 3.4.2 and 3.4.1. These conditions incorporate respectively the applicable visible and PM emissions limits in Georgia Rules (b) and (e).

Condition 2.4 in the current permit was carried over into this draft permit and renumbered Conditions 3.4.3. This condition is a vault condition incorporating respectively the applicable PM and visible emissions limits in Georgia Rule (d) for fuel burning equipment such as boilers. Burning gaseous fuels such as natural gas exclusively, all the boilers at this facility are expected to comply with these limits.

Condition 2.1 in the current permit was carried over into this draft permit and renumbered Condition 3.4.4. This condition limits the PM emissions from all the baghouses to 0.022 gr/dscf. This limit originated from NSPS Subpart OOO for affected sources constructed, modified, or reconstructed after August 31, 1983, but before April 22, 2008. This limit was established by the original permit No. 3272-021-0209-B-01-0 issued on May 10, 2006, for the construction and operation of this facility. The typical discharging PM concentrations of properly maintained and operated baghouses range between 0.001 to 0.01 gr/dscf<sup>[1]</sup>, with all the PM as PM<sub>10</sub> including PM<sub>2.5</sub>. Therefore, PM emission sources controlled by baghouses are expected to comply with this limit as well as with the PM and visible emission limits in Rules (e) and (b) and NSPS Subpart OOO.

Conditions 3.1 and 3.2 in the current permit were carried over into this draft permit and renumbered Conditions 3.4.5 and 3.4.6. Condition 3.4.5 requires the Permittee to take all necessary precautions to prevent fugitive emissions under Georgia Rule (n). The fugitive emissions from this facility are

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<sup>[1]</sup> U.S. EPA Handbook: Control Technologies for hazardous Air Pollutants, EPA/625/6-91/014, P 4-70 (June 1991)

expected to comply with the applicable visible emission limit of 20% in Condition 3.4.6, as most of the production processes, except shipment, are indoor operations.

Condition 4.3 in the current permit was modified and renumbered Condition 3.4.7. The modification removed the operating parameter monitoring requirements for the wet scrubber because they were repeated the Conditions 5.2.1, 5.2.3 and 6.1.6. This condition ensures the control of HCl emissions from its storage tanks.

Condition 8.3 in the current permit was carried over into this draft permit and renumbered Condition 3.4.8. This condition establishes the health-based exhaust/discharge requirements for stack(s) emitting gaseous toxic air pollutants, mainly VOCs. These requirements are based on gas dispersion modeling, i.e., Toxic Impact Assessment performed during the original permitting. Because the dispersion model used, i.e., SCREEN3, requires unobstructed vertical gas velocities, this condition requires that none of the stacks emitting gaseous toxic air pollutants are rain-capped or discharging horizontally or downward.

Condition 4.2 in the current permit was carried over into this draft permit and renumbered Condition 3.5.1. This condition ensures the proper function of baghouses thus the compliance with the pertinent PM emissions.

**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**

Condition 6.1 in the current permit No. 3272-021-0209-E-05-0 was carried over into this draft permit and renumbered Condition 4.2.1. This condition is a template/standard condition incorporating requirements for performance testing required by the Division.

Condition 6.2 in the current permit was carried over into this draft permit and renumbered Condition 4.2.2. This standardized condition establishes a general NSPS testing requirement.

Conditions 4.2.3 and 4.2.4 were added to establish two specific testing requirements, when applicable, under NSPS Subpart OOO.

**V. Monitoring Requirements****A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

**B. Specific Monitoring Requirements**

Condition 5.1 in the current permit No. 3272-021-0209-E-05-0 was revised and then renumbered Condition 5.2.1. The revision added monitoring requirements for scrubbing pH value and flowrate of the wet scrubber WS01 being used to control HCl emissions. This revision ensures the proper function of the wet scrubber and thus the control of the acidic gas.

Conditions 5.2, 5.2, and 5.3 in the current permit were carried over into this draft permit and renumbered respectively as Conditions 5.2.2, 5.2.3 and 5.2.4. These conditions ensure the proper function and maintenance of baghouses controlling PM emissions.

**C. Compliance Assurance Monitoring (CAM)**

Per 40 CFR 64.5, the Permittee shall determine facility's CAM applicability and, if applicable, submit a CAM plan(s) as part of the application for the first Title V permit renewal.

## **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**

Condition 7.1 in the current permit was carried over and renumbered as Condition 6.2.1. It contains a standard notification requirement for facility modification and ensures that any modification to the facility complies with pertinent rules before it begins. Current Condition 7.2 was renumbered as Condition 6.2.2. This condition contains applicable notification, reporting and record keeping requirements for new or reconstructed NSPS equipment.

Conditions 7.3, 7.4 and 7.5 in the current permit were all carried over and renumbered Conditions 6.2.3, 6.2.4 and 6.2.5. The record keeping, compliance determination and reporting requirements in these conditions work together to ensure compliance with the 249 tons per year facility-wide VOC emission limit in Condition 2.1.1. Since VOC emissions from natural gas combustion at this facility are negligible in comparison with those from painting operations, the VOC calculation equation in Condition 6.2.4 omits the VOC emissions from natural gas combustion.

Conditions 7.6, 7.7 and 7.8 in the current permit were carried over and renumbered Conditions 6.2.6, 6.2.7 and 6.2.8. The record keeping, compliance determination and reporting requirements of these conditions work together to ensure compliance with the 10/25 tons per year facility-wide HAP emission limits in Condition 2.1.2. Since HAP emissions from natural gas combustion at this facility are negligible in comparison with those from painting operations, such emissions are not considered.

Condition 7.9 in the current permit was carried over and renumbered Condition 6.2.9. The record keeping requirements in this condition ensure the proper operation and maintenance of the control devices and the reduction of fugitive emissions.

Condition 7.10 in the current permit was carried over and renumbered Condition 6.2.10. This condition contains applicable fuel usage record keeping requirements of NSPS Subpart Dc for natural gas-fired boilers with their design heat input rate greater than 10 MMBtu/hr.

Condition 7.11 in the current permit was eliminated because the Permittee fulfilled the notification requirement in the permit.

Condition 8.1 in the current permit was eliminated because Subsection 8.11 of this draft permit already contains the same provision.

Condition 8.3 in the current permit was eliminated since the Permittee already fulfilled the requirements in this condition.



**VII. Specific Requirements****A. Operational Flexibility**

None

**B. Alternative Requirements**

None

**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**

None

**I. Stratospheric Ozone Protection Requirements**

None

**J. Pollution Prevention**

None

**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. //