

Facility Name: **Prayon, Inc.**
 City: Augusta
 County: Richmond
 AIRS #: 04-13-245-00012

Application #: TV-473938
 Date Application Received: April 27, 2020
 Permit No: 2819-245-0012-V-06-0

Program	Review Engineers	Review Managers
SSPP	Susan Jenkins	Heather Brown
ISMU	Anna Gray	Dan McCain
SSCP	Daniel Slade	Steve Allison
Toxics	N/A	N/A
Permitting Program Manager		Eric Cornwell

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: Prayon, Inc.
2. Parent/Holding Company Name

Prayon S.A.

3. Previous and/or Other Name(s)

Monsanto Company
 Monsanto Industrial Chemicals Company
 Solutia, Inc.
 Astaris, L.L.C.

4. Facility Location

1610 Marvin Griffin Road, Augusta, Georgia 30906

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

The 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
2819-245-0012-V-05-0	6/12/2015	Title V Renewal Permit
2819-245-0012-V-05-1	8/25/2020	MAWO: Update equipment listing and source code identification numbers in several existing permit conditions.

D. Process Description

1. SIC Codes(s)

2819-Industrial Inorganic Chemicals, Not Elsewhere Classified

2. Description of Product(s)

The Prayon facility manufactures calcium phosphate salts and sodium/potassium salts.

3. Overall Facility Process Description

Calcium Phosphate Plant

Calcium phosphate salts are produced by an acid-base reaction using phosphoric acid and calcium hydroxide. The process begins with the unloading and milling of quicklime. The lime is then hydrated to form calcium hydroxide and is screened to remove impurities. The calcium hydroxide slurry is combined with phosphoric acid in a batch neutralization/crystallization process. A centrifuge is used to separate the liquor from the crystals. Centrifuge liquor and lime screen runoff are recycled back into the process. The crystals are processed through a rotary kiln mill for drying and sizing. The dried product is either blended and packaged or sent to the calciner to make soft calcium pyrophosphate (SCPP). The final products are packaged into bags, drums, or bulk bags. The facility also has the capability of shipping bulk by rail.

Sodium/Potassium Phosphates Plant

The Sodium/Potassium Phosphates Plant is comprised of four (4) areas: the Mix Area, Drying and Calcining (D&C), Sizing and Packaging. Sodium and potassium phosphate salts are produced by an acid-base reaction between phosphoric acid and potassium hydroxide, sodium hydroxide or sodium carbonate in a semi-batch process. The orthophosphate feed liquor produced is then fed to the D&C loop, where the final reaction takes place. The D&C loop consists of an external recycle calciner loop. The liquor is sprayed into a "seed" bed of product in the dryer. The material is then cycled between the calciner and the dryer-driving off excess water and converting the product to the desired final product. After calcining, the material is cooled and conveyed to the appropriate system for milling into granular or powder form. The plant produces both granular and powder forms of most of the products which can also be blended. The products are packaged in 50-pound bags or larger bulk bags. The plant also has the ability to ship several products via truck or rail.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Prayon is classified as a *chemical process plant* under 40 CFR 52.21(b)(1)(i) and therefore the PSD/NSR major source applicability threshold is 100 tons per year for *regulated NSR pollutants*. The facility is considered an existing *major source* per the PSD regulation because potential emissions of particulate matter (PM, PM₁₀, PM_{2.5}) exceed 100 tons per year.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓			✓
VOC	✓			✓
NO _x	✓			✓
CO	✓			✓
TRS	--			
H ₂ S	--			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

No MACT standard applies to this facility.

40 CFR 63 Subpart JJJJJ does not apply to the existing boiler because the boiler is limited to operate as a *gas-fired boiler* per this regulation.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	No

Regulatory Analysis**II. Facility Wide Requirements**

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility is operating in compliance with all applicable rules and regulations.

D. Permit Conditions

None 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
SODIUM/POTASSIUM (NaK) PHOSPHATE PLANT				
Drying				
4130	Rotary Dryer	391-3-1-.02(2)(b)	S202	Dryer Rotoclone Wet Scrubber
4136	Hot Recycle Conveyor	391-3-1-.02(2)(e)		
Calcining				
4134	Calciner with 3 Cyclones	391-3-1-.02(2)(b)	S203	Calciner Rotoclone Wet Scrubber
4140	Calciner Heater	391-3-1-.02(2)(e)		
		391-3-1-.02(2)(g)		
Granular Mill				
4302	Granular Mill	391-3-1-.02(2)(b)	S204	Granular Dust Collector
4303	Separator	391-3-1-.02(2)(e)		
4317	Recycle Conveyor	391-3-1-.03(2)(c)		
4341	Screw Conveyor			
Powder Mill				
4201	Powder Mill Feed Bin	391-3-1-.02(2)(b)	S205	Imp Mill Dust Collector
4202	Powder Mill with Whizzer	391-3-1-.02(2)(e)		
Blending				
7214	Blender with Cyclone	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.03(2)(c)	S206	Blender Dust Collector
Packaging				
7219	East Packing Elevator	391-3-1-.02(2)(b)	S207A	Packing System Dust Collector
7222	Supersack Filling Machine	391-3-1-.02(2)(e)		
7223	Conveyor/Transfer Screws	391-3-1-.03(2)(c)		
7254	Conveyor/Transfer Screws			
7259	Conveyor/Transfer Screws			
7403	Conveyor/Transfer Screws			
7224	East Packing Bin	391-3-1-.02(2)(b)	S207B	Packing Dust Collector
7227	Middle Packing Bin	391-3-1-.02(2)(e)		
7237	Haver Packing Machine	391-3-1-.03(2)(c)		
7204	Conveyor/Transfer Screws	391-3-1-.02(2)(b)	S208	Bulk Loading Dust Collector
7207	Conveyor/Transfer Screws	391-3-1-.02(2)(e)		
7211	Conveyor/Transfer Screws	391-3-1-.03(2)(c)		
7215	Conveyor/Transfer Screws			
OTHER				
S210	Keeler Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.03(2)(c)	None	None
CALCIUM PHOSPHATE PLANT				
Lime Mill				
5108	Lime Hammer Mill	391-3-1-.02(2)(b)	S302	Lime Mill Dust Collector
5109	Lime Mill Bin	391-3-1-.02(2)(e)		
		391-3-1-.03(2)(c)		
Calcining				
5401	Feed Bin	391-3-1-.02(2)(b)	S305	Calciner Dust Collector
5405	Calciner	391-3-1-.02(2)(e)		
5406	Calciner Heater	391-3-1-.03(2)(c)		
		391-3-1-.02(2)(g)		
Blending				
5433	Surge Bin	391-3-1-.02(2)(b)	S306	Surge Bin Dust Collector
5436	Blender	391-3-1-.02(2)(e)		
5439	Blend Bin	391-3-1-.03(2)(c)		
6545	Blend Bin			
5422	Imp Mill Hopper			

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
Imp Mill				
5423	Imp Mill Feeder	391-3-1-.02(2)(b)	S307	SCPP Dust Collector
5424	Imp Mill with Cyclone	391-3-1-.02(2)(e)		
5505	Bulk Loading Elevator	391-3-1-.03(2)(c)		
5507	Bulk Silo			
5702	Railcar Loading Chute			
Roller Mill				
6271	Roller Mill with Whizzer and Cyclone	391-3-1-.02(2)(b)	S308	Roller Mill Dust Collector
6273	Roller Mill Heater	391-3-1-.02(2)(e)		
		391-3-1-.02(2)(g)		
		391-3-1-.03(2)(c)		
Packaging				
6550	Packing Bin	391-3-1-.02(2)(b)	S309A	Bagger Dust Collector
6552	Haver Bagging Machine	391-3-1-.02(2)(e)		
6581	Cut in Hopper	391-3-1-.03(2)(c)		
6570	Screw Conveyor	391-3-1-.02(2)(b)	S309B	SBFM Dust Collector
6574	Bulk Loading Machine	391-3-1-.02(2)(e)		
		391-3-1-.03(2)(c)		

B. Equipment & Rule Applicability

Georgia Rule 391-3-1-.02(2)(e)-Particulate Emission from Manufacturing Processes

Process operations (excluding fuel burning equipment) are subject to Georgia Rule (e) for emissions of PM. The Georgia Rule (e) process groups are grouped based on the discharge stack. PM emissions are limited based on a dry process input weight rate rule.

Georgia Rule 391-3-1-.02(2)(g)-Visible Emissions

The provisions of this state rule apply to affected emission units at the Plant which are not subject, in this case, to another emission standard in Georgia Rule 391-3-1-.02(2). Georgia Rule (b) limits the opacity to less than or equal to forty (40) percent.

Georgia Rule 391-3-1-.02(2)(d)-Fuel-Burning Equipment

This state rule applies to indirect-fired pieces of fuel-burning equipment and in this case this state rule applies to the Keeler Boiler (S210) constructed in 1984. Georgia Rule (d) limits the emissions of fly ash and/or other PM based on the maximum heat input. The Keeler Boiler has a maximum heat input of 37 MMBtu/hr.

Georgia Rule (d) also limits the visible emissions the opacity of which is less than twenty (20) percent except for one six-minute period per hour of not more than twenty-seven (27) percent opacity.

Note: Calciner heaters (4140 and 5406) are direct-fired units. Therefore, these units are not subject to Georgia Rule (d).

Georgia Rule 391-3-1-.02(2)(g)-Sulfur Dioxide

The following table specifies the fuel-burning sources at the facility:

ID No.	Description	Installation year	Allowed Fuel Types
5406	Calciner Heater (3 MMBtu/hr direct fired)	1975	Natural gas Propane
6273	Roller Mill Heater	1997	Natural gas Propane
S210	Keeler Boiler (37.7 MMBtu/hr)	1984	Natural gas Propane

Georgia Rule 391-3-1-.03(2)(c)

The existing Title V Permit restricts the types of fuels that may be combusted in the Calciner Air Heater (4140) and Calciner Heater (5406) to natural gas or propane per this state rule. This condition is carried over to the updated Title V Renewal Permit.

Non-Applicable Regulation-40 CFR 63 Subpart JJJJJ-National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The operation of the Keeler boiler (S210) does not trigger applicability to this rule because the boiler is permitted to be operated as a *gas-fired boiler* as defined in the rule. In addition, the calciner heaters and mill heater are not subject to this regulation because they are direct-fired emission units.

Non-Applicable Regulation-40 CFR 60 Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The Keeler boiler (S210) is not subject to 30 CFR 60 Subpart Dc because it was constructed before the applicability date.

C. Permit Conditions

New Condition No.	Existing Condition No.	Discussion
3.2.1	3.2.1 (V-05-0)	<i>No Change</i> Fuel type restriction for the operation of the boiler S210 for purposes of avoidance of 40 CFR 63 Subpart JJJJJ.
3.2.2	3.2.2 (V-05-1)	<i>No Change</i> Fuel type restriction for the operation of the Calciner Heaters (4140 and 5406) and the Roller Mill Heater (6273).
3.4.1	3.4.1 (V-05-0)	<i>No Change</i> Establishes the requirement of Georgia Rule 391-3-1-.02(2)(e).
3.4.2	3.4.2 (V-05-0)	<i>No Change</i> Establishes the requirement of Georgia Rule 391-3-1-.02(2)(b).
3.4.3 3.4.4	3.4.3 3.4.4 (V-05-0)	<i>No Change</i> Establishes the requirements of Georgia Rule 391-3-1-.02(2)(d).
3.5.1	3.5.1 (V-05-0)	<i>No Change</i> Establishes the requirement that Prayon maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones per Georgia Rule 391-3-1-.03(2)(c).

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

None applicable.

C. Permit Conditions

New Condition No.	Existing Condition No.	Discussion
4.1.1	4.1.1	<i>No Change</i> General testing requirement.
4.1.2	4.1.2	<i>No Change</i> General testing requirement.
4.1.3	4.1.3	<i>Modified</i> The Reference test method for verifying compliance with Georgia Rules (e) and (d) is clarified to be Method 5. Method 202 is added as applicable.
4.1.4	4.1.4	<i>No Change</i> General testing requirement.

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

Existing Monitoring Requirements for Dust Collectors		
Control Device No.	Control Device Type	Existing Monitoring Requirements to Provide a Reasonable Assurance of Compliance with Georgia Rules (e) and (b)
S204	Dust Collector	Differential pressure across each collector and record these values at least once per shift of operation. Implement a Preventative Maintenance Program plan for each dust collector. Daily VE Check.
S205	Dust Collector	
S206	Dust Collector	
S207A	Dust Collector	
S207B	Dust Collector	
S208	Dust Collector	
S302	Dust Collector	
S305	Dust Collector	
S306	Dust Collector	
S307	Dust Collector	
S308	Dust Collector	
S309A	Dust Collector	
S309B	Dust Collector	

Existing Monitoring Requirements for Rotoclone Wet Scrubbers		
Control Device No.	Control Device Type	Existing Monitoring Requirements to Provide a Reasonable Assurance of Compliance with Georgia Rules (e) and (b)
S202	Rotoclone Wet Scrubber	Differential pressure across each scrubber and record these values at least once per shift of operation. Implement a Preventative Maintenance Program plan for each scrubber. Daily VE Check.
S203	Rotoclone Wet Scrubber	

C. Compliance Assurance Monitoring (CAM)

Applicable State Rule is Georgia Rule 391-3-1-.02(2)(e).					
Emission Unit	Control Device	Pollutant	Unc. PM (tpy) ¹	Con. PM (tpy) ²	Subject to CAM?
4130-Rotary Dryer 4136-Hot Recycle Conveyer	S202-Dryer Rotoclone Wet Scrubber	PM	30222 516	30.22	Yes
4134-Calciner with 3 Cyclones 4140 Calciner Heater	S203-Calciner Rotoclone Wet Scrubber	PM	516	30.22	Yes
4302-Granular Mill 4303-Separator 4317-Recycle Conveyer 4341-Screw Conveyer	S204-Granular Dust Collector	PM	142	1.58	Yes
4201-Powder Mill Feed Bin 4202-Powder Mill with Whizzer	S205-Imp Mill Dust Collector	PM	6132	61.32	Yes
7214-Blender with Cyclone	S206-Blender Dust Collector	PM	65	0.65	No
7219-East Packing Elevator 7222-Supersack Filing Machine 7223-Conveyor/Transfer Screws 7254-Conveyor/Transfer Screws 7259-Conveyor/Transfer Screws 7403-Conveyor/Transfer Screws	S207A-Packing System Dust Collector	PM	359	3.59	Yes

Applicable State Rule is Georgia Rule 391-3-1-.02(2)(e).					
Emission Unit	Control Device	Pollutant	Unc. PM (tpy)¹	Con. PM (tpy)²	Subject to CAM?
7224-East Packing Bin 7227-Middle Packing Bin 7237-Haver Packing Machine	S207B-Packing System Dust Collector	PM	434	4.34	Yes
7204-Conveyor/Transfer Screws 7207-Conveyor/Transfer Screws 7211-Conveyor/Transfer Screws 7215-Conveyor/Transfer Screws	S208-Bulk Loading Dust Collector	PM	203	2.03	Yes
5108-Lime Hammer Mill 5109-Lime Mill Bin	S302-Lime Mill Dust Collector	PM	14	0.14	No
5401-Feed Bin 5405-Calciner 5406-Calciner Heater	S305-Calciner Dust Collector	PM	944	9.54	Yes
5433-Surge Bin 5436-Blender 5439-Blend Bin 6545-Blend Bin 5422-Imp Mill Hopper	S306-Surge Bin Dust Collector	PM	102.5	1.025	Yes
5423-Imp Mill Feeder 5424-Imp Mill with Cyclone 5505-Bulk Loading Elevator 5507-Bulk Silo 5702-Railcar Loading Chute	S307-SCPP Dust Collector	PM	1017.5	10.175	Yes
6271-Roller Mill with Whizzer and Cyclone 6273-Roller Mill Heater	S308-Roller Mill Dust Collector	PM	50	0.50	No
6550-Packing Bin 6552-Haver Bagging Machine 6581-Cut in Hopper	S309A-Bagger Dust Collector	PM	66	0.66	No
6570-Screw Conveyor 6574-Gravity fed bulk loading	S309B-SBFM Dust Collector	PM	72	0.72	No

¹Uncontrolled; ²Controlled.

Existing Condition 5.2.4 is revised as follows based on the CAM applicability summarized in the above table.

Plant	Emission Unit	Control Device	Pollutant
NaK Plant			
Drying	4130-Rotary Dryer 4136-Hot Recycle Conveyor	Dryer Rotoclone Wet Scrubber (S202)	PM
Calcining	4134-Calciner with 3 Cyclones 4140 Calciner Heater	Calciner Rotoclone Wet Scrubber (S203)	PM
Granular Mill	4302-Granular Mill 4303-Separator 4317-Recycle Conveyor 4341-Screw Conveyor	Granular Dust Collector (S204)	PM
Powder Mill	4201-Powder Mill Feed Bin 4202-Powder Mill with Whizzer	Imp Mill Dust Collector (S205)	PM
Blending	7214-Blender with Cyclone	Blender Dust Collector (S206)	PM
Packaging	7219-East Packing Elevator 7222-Supersack Filing Machine 7223-Conveyor/Transfer Screws 7254-Conveyor/Transfer Screws 7259-Conveyor/Transfer Screws 7403-Conveyor/Transfer Screws	Packing System Dust Collector (S207A)	PM

Plant	Emission Unit	Control Device	Pollutant
Packaging	7224-East Packing Bin 7227-Middle Packing Bin 7237-Haver Packing Machine	Packing System Dust Collector (S207B)	PM
Packaging	7204-Conveyor/Transfer Screws 7207-Conveyor/Transfer Screws 7211-Conveyor/Transfer Screws 7215-Conveyor/Transfer Screws	Bulk Loading Dust Collector (S208)	PM
Calcium Phosphate Plant			
Lime Mill	5108-Lime Hammer Mill 5109-Lime Mill Bin	Lime Mill Dust Collector (S302)	PM
Calcining	5401-Feed Bin 5405-Calciner 5406-Calciner Heater	Calciner Dust Collector (S305)	PM
Blending Blending Blending Blending Imp Mill	5433-Surge Bin 5436-Blender 5439-Blend Bin 6545-Blend Bin 5422-Imp Mill Hopper	Surge Bin Dust Collector (S306)	PM
Imp Mill	5423-Imp Mill Feeder 5424-Imp Mill with Cyclone 5505-Bulk Loading Elevator 5507-Bulk Silo 5702-Railcar Loading Chute	SCPP Dust Collector (S307)	PM
Roller Mill	6271-Roller Mill with Whizzer and Cyclone 6273-Roller Mill Heater	Roller Mill Dust Collector (S308)	PM
Packaging	6550-Packing Bin 6552-Haver Bagging Machine 6581-Cut in Hopper	Bagger Dust Collector (S309A)	PM
Packaging	6570-Screw Conveyor 6574-Gravity fed bulk loading	SBFM Dust Collector (S309B)	PM

Permit Conditions

New Condition No.	Existing Condition No.	Discussion
5.2.1.a	5.2.1.a	<i>No Change</i> Monitoring requirements for Rotoclone Wet Scrubbers S202 and S203.
5.2.1.b	5.2.1.b	<i>No Change</i> Monitoring requirements for dust collectors S204, S205, S206, S207A, S207B, S208, S302, S305, S307, S309A, and S309B.
5.2.2	5.2.2	<i>No Change</i> Maintain the Rotoclone Wet Scrubbers and Dust Collectors in accordance with the most recent Preventative Maintenance Program plan.
5.2.3	5.2.3	<i>No Change</i> Perform daily VE checks from equipment specified in Table 3.1 of the Permit.

New Condition No.	Existing Condition No.	Discussion
5.2.4	5.2.4	<i>Modified</i> Summarizes applicability of 40 CFR 64. Removed the following emissions units: -Blender with Cyclone (7214)/Dust Collector S206 -Lime Hammer Mill (5108)/Dust Collector S302 -Lime Mill Bin (5109)/Dust Collector S302 -Roller Mill with Whizzer and Cyclone (6271)/Dust Collector S308 -Roller Mill Heater (6273)/Dust Collector S308 -Packing Bin (6550)/Dust Collector S309A -Haver Bagging Machine (6552)/Dust Collector S309A -Cut in Hopper (6581)/Dust Collector S309A -Screw Conveyor (6570)/Dust Collector S309B -Gravity fed bulk loading (6574)/Dust Collector S309B
5.2.5	5.2.5	<i>No Change</i> CAM requirements for Rotoclone Wet Scrubbers S202 and S203.
5.2.6	5.2.6	<i>Modified</i> Removed dust collectors S206, S302, S308, S309A, and S309B from CAM applicability. Updated table row labeled A-removed redundant language.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

New Condition No.	Existing Condition No.	Discussion
6.1.7.b.i	6.1.7.b.i (V-05-1)	<i>No Change</i> Exceedance definition associated with the fuel types combusted in fuel-burning sources 4140, 5406, and 6273.
6.1.7.c.i	6.1.7.c.i (V-05-0)	<i>No Change</i> Excursion definition for pressure drop readings associated with the Rotoclone Wet Scrubbers S202 and S203.
6.1.7.c.ii	6.1.7.c.ii	<i>Modified</i> Excursion definition for pressure drop readings associated with Dust Collectors S204, S205, S206, S207A, S207B, S208, S302, S305, S306, S308, S309A, and S309B. Removed reference to Dust Collectors S209 and S214 because these control devices are no longer at the facility.

New Condition No.	Existing Condition No.	Discussion
6.1.7.c.iii	6.1.7.c.iii	<i>No Change</i> Excursion definition associated with the required daily VE checks.
6.1.7.c.iv	6.1.7.c.iv	<i>No Change</i> Excursion definition associated with implementation of the Preventative Maintenance Program for the wet scrubbers and dust collectors.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

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

D. Temporary Sources

The facility periodically rents a temporary boiler. The heat input of the rental boiler usually ranges from 30 MMBtu/hr to 40 MMBtu/hr. Applicable standards include, depending on construction year, Georgia Rules 391-3-1-.02(2)(d), (g), and 40 CFR 60 Subpart Dc. The existing avoidance requirement for 40 CFR 63 Subpart JJJJJ is carried over as well.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not 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.//