

Facility Name: **Active Minerals International – Main Plant**  
City: Gordon  
County: Wilkinson  
AIRS #: 04-13-319-00021

Application #: TV-565530  
Date Application Received: October 5, 2021  
Permit No: 3295-319-0021-V-03-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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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: Active Minerals International – Main Plant

2. Parent/Holding Company Name

Active Minerals International, LLC

3. Previous and/or Other Name(s)

Wilkinson Kaolin Associates LLC (WKA LLC)

Wilkinson Kaolin Associates LTD

4. Facility Location

121 Milledgeville Road Highway 243  
Gordon, Georgia 31031

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

This facility is 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 permits, all amendments, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

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

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3295-319-0021-S-02-0	October 24, 2007	Name and ownership change.
Off-permit change	January 3, 2008	Replacement of old #2 bulk bagging system with a new system.
Off-permit change	August 5, 2010	Addition of a new bulk bagger #4 (Source ID no. 454)
3295-319-0021-S-02-1	November 15, 2010	Add new impact dryer mill (ID No. 425), reject bin (ID No. 502), and two Truck Loadout Stations Nos. 1 & 2 (ID Nos. 491 & 492). The Impact Dryer Mill (ID No. 425) has an integral 20 MMBTU natural gas-fired burner.

Off-permit change	October 14, 2011	Addition of two railcar load out stations, two screw conveyors, one reject bin, four surge bins, and a four spout bulk bagger
3295-319-0021-S-02-2	September 11, 2012	Update the facility-wide emissions resulting in the removal of Condition 9.4 and the requirement to submit a Title V application.
3295-319-0021-S-02-3	December 4, 2018	Add No. 5 Mill and Reject Bin No. 2; and replace bin vents/baghouses serving six existing silos (Silo Nos. 3 thru 8).

#### D. Process Description

##### 1. SIC Codes(s)

3295

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

##### 2. Description of Product(s)

The facility processes kaolin.

##### 3. Overall Facility Process Description

Active Minerals International – Main Plant operates a kaolin clay processing facility located in Gordon, Wilkinson County, Georgia. The plant is comprised of various processing operations, including raw material handling, milling and drying, final product conveying, storage, bagging, and bulk loading.

##### 4. Overall Process Flow Diagram

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

#### E. Regulatory Status

##### 1. PSD/NSR

Active Minerals International – Main Plant is a non-major source under PSD/NSR regulations.

## 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			✓
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 subject to any MACT standard.

## 4. Program Applicability (AIRS Program Codes)

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

**Regulatory Analysis****II. Facility Wide Requirements****A. Emission and Operating Caps:**

None applicable.

**B. Applicable Rules and Regulations**

Equipment subject to 40 CFR Part 60 must comply with the applicable requirements as stated in 40 CFR 60 Subpart A – “General Provisions.”

**C. Compliance Status**

The facility has not indicated any non-compliance issues.

**D. Permit Conditions**

Permit conditions have been updated to reflect the current rules, language, and format for permits issued to kaolin clay processing plants.

Condition 2.2.1 requires all the emission units subject to NSPS Subpart OOO to comply with the applicable general provisions of 40 CFR 60 Subpart A.

### 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
Mill #1 (66" Raymond Mill)				
150	Mill #1 Shredder	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
151	Mill #1 Shredder Belt Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
152	Mill #1 Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
153	Mill #1 Cage Mill Screw Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
250 260 824	Cage Mill Cage Mill Air Heater Cage Mill Cyclone No. 1	391-3-1-.02(2)(p)1 NSPS OOO	825	Baghouse
350 360 834 155 156	Raymond Mill Raymond Mill Heater Raymond Mill Cyclone Classifier Classifier Cyclone	391-3-1-.02(2)(p)1 NSPS OOO	835	Baghouse
158	Pneumatic Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	865/866	Baghouse
650	#1 Silo	391-3-1-.02(2)(p)1 NSPS OOO	865	Baghouse
660	#2 Silo	391-3-1-.02(2)(p)1 NSPS OOO	866	Baghouse
410	Track 1&2 Bulk Loading Conveyor #1 and 2 Silos	391-3-1-.02(2)(p)1 NSPS OOO	841	Baghouse
440	Old Bulk Bagger	391-3-1-.02(2)(p)1 NSPS OOO	844	Baghouse
Mill #2 (68" Bradley Mill)				
100	Mill #2 Shredder	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
101	Mill #2 Shredder Belt Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
102	Mill #2 Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
103	Mill #2 Feed Bin Belt Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
200 210 819	Cage Mill Cage Mill Air Heater Cage Mill Cyclone No. 2	391-3-1-.02(2)(p)1 NSPS OOO	820	Baghouse
104	Mill #2 Cage Mill Product Screw Conveyor with Bradley Mill Line Dump Hopper	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
510	Reject Unloading	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
400	Cage Mill Product Railcar Loadout	391-3-1-.02(2)(p)1 NSPS OOO	821	None
300 310 829 106	Roller Mill Roller Mill Heater Roller Mill Cyclone Classifier	391-3-1-.02(2)(p)1 NSPS OOO	830	Baghouse
107	Dust Collector Product Pneumatic Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	860/861/ 862	Baghouse
108	Mill Product Pneumatic Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	860/861/ 862	Baghouse
600	#3 Silo	391-3-1-.02(2)(p)1 NSPS OOO	860	Baghouse
610	#4 Silo	391-3-1-.02(2)(p)1 NSPS OOO	861	Baghouse
620	#5 Silo	391-3-1-.02(2)(p)1 NSPS OOO	862	Baghouse
450	Track 1&2 Bulk Loading Conveyor #3, 4 & 5 Silos	391-3-1-.02(2)(p)1 NSPS OOO	845	Baghouse
500	Reject Bin	391-3-1-.02(2)(p)1 NSPS OOO	850	Baghouse
<b>Mill #3 (73" Raymond Mill)</b>				
125	Mill #3 Shredder	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
126	Mill #3 Shredder Belt Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
127	Mill #3 Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
128	Mill #3 Feed Bin Belt Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
129	Mill #3 Cage Mill Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
225 235 826	Cage Mill Cage Mill Air Heater Cage Mill Cyclone No. 3	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) NSPS OOO	827	Baghouse
300 310 829 106	Roller Mill Roller Mill Air Heater Roller Mill Cyclone Classifier	391-3-1-.02(2)(p)1 NSPS OOO	837	Baghouse
131	Dust Collector Product Pneumatic Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	867/868/ 869	Baghouse
132	Mill Product Pneumatic Conveyors	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	867/868/ 869	Baghouse
670	#6 Silo	391-3-1-.02(2)(p)1 NSPS OOO	867	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
680	#7 Silo	391-3-1-.02(2)(p)1 NSPS OOO	868	Baghouse
690	#8 Silo	391-3-1-.02(2)(p)1 NSPS OOO	869	Baghouse
460	Track 1 Bulk Loading Conveyor #6, 7 & 8 Silos	391-3-1-.02(2)(p)1 NSPS OOO	846	Baghouse
470	Track 2 Bulk Loading Conveyor #6, 7 & 8 Silos	391-3-1-.02(2)(p)1 NSPS OOO	847	Baghouse
480	Track 3 Bulk Loading Conveyor #6, 7 & 8 Silos	391-3-1-.02(2)(p)1 NSPS OOO	848	Baghouse
490	Track 4 Bulk Loading Conveyor #3, 4 & 5 Silos	391-3-1-.02(2)(p)1 NSPS OOO	849	Baghouse
<b>Mill #4 (Model 580 Williams Hammermill)</b>				
140	Mill #4 Shredder	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
141	Mill #4 Shredder Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
146	Mill #4 Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
425	No. 4 Mill	391-3-1-.02(2)(g) 391-3-1-.02(2)(p)1 NSPS OOO	870	Baghouse
491	Truck Loadout Station No. 1	391-3-1-.02(2)(p)1 NSPS OOO	872	Baghouse
492	Truck Loadout Station No. 2	391-3-1-.02(2)(p)1 NSPS OOO	873	Baghouse
<b>Mill #5 (Model 580 Williams Hammermill)</b>				
143	Mill #5 JC Steele Feeder	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
144	Mill #5 Conveyor	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
147	Mill #5 Feed Bin	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	N/A	None
175	No. 5 Mill	391-3-1-.02(2)(g) 391-3-1-.02(2)(p)1 NSPS OOO	875	Baghouse
503	Reject Bin No. 2	391-3-1-.02(2)(p)1 NSPS OOO	874	Baghouse
<b>Bagging Warehouse</b>				
430	50-Pound Bagger	391-3-1-.02(2)(p)1 NSPS OOO	842	Baghouse
450	Bulk Bag Station #1	391-3-1-.02(2)(p)1 NSPS OOO	851	Baghouse
452	Bulk Bag Station #3	391-3-1-.02(2)(p)1 NSPS OOO	853	Baghouse
460	Bulk Bag Station #2	391-3-1-.02(2)(p)1 NSPS OOO	852	Baghouse



Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
454	Gold Star Bulk Bagging	391-3-1-.02(2)(p)1 NSPS OOO	854	Baghouse

## B. Equipment & Rule Applicability

### Rules and Regulations Assessment:

40 CFR 60 Subpart OOO - “Nonmetallic Mineral Processing Plants” applies to most of the equipment associated with this facility, as shown in Table 3.1 of the permit. Subpart OOO applies to crushers, grinders, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins and enclosed truck or railcar loading stations at nonmetallic mineral processing plants. Kaolin is defined by this regulation as being a nonmetallic mineral. The emission standards for this regulation are contained in Condition 3.3.1 of the permit.

Georgia Rule 391-3-1-.02(2)(p) - “Particulate Emissions from Kaolin and Fuller's Earth Processes” regulates the PM emissions from the listed kaolin processing units as identified in Table 3.1. The applicable emission limits under Georgia Rule (p) are determined by the process input weight rate and the construction or modification date of each piece of affected equipment as specified by Condition 3.4.1.

Georgia Rule 391-3-1-.02(2)(b) - “Visible Emissions” applies to all sources at this facility except those subject to other more restrictive or specific rules. Georgia Rule (b) limits the visible emissions to no greater than 40 percent opacity. Properly operated baghouses will ensure compliance with the 40 percent opacity limit.

Georgia Rule 391-3-1-.02(2)(g) - “Sulfur Dioxide” limits the sulfur content of affected fuel burning sources below 100 million BTUs of heat input per hour to no more than 2.5 percent by weight. For fuel burning sources having a heat input of 100 million BTU's per hour or greater, the fuel sulfur content limit under Georgia Rule (g) is no more than 3 percent sulfur by weight. Since the fuel burning sources at this facility are fired exclusively with natural gas, compliance with these standards is expected.

## C. Permit Conditions

Permit conditions have been updated to reflect the current rules, language, and format for permits issued to kaolin clay processing plants.

Condition 3.3.1 establishes the applicability of 40 CFR 60 Subpart OOO and includes requirements for equipment subject to the rule.

Condition 3.4.1 states the allowable rates of particulate emissions in accordance Georgia Rule (p). Condition 3.4.2 limits opacity to 40 percent in accordance with Georgia Rule (b). Condition 3.4.3 limits sulfur content of fuel in accordance with Georgia Rule (g).

Condition 3.5.1 and 3.5.2 requires operation of baghouses to control PM emissions from kaolin production and maintaining an inventory of replacement filter bags. Condition 3.5.3 includes requirements to perform routine maintenance on pollution control equipment.

#### **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**

Permit conditions have been updated to reflect the current rules, language, and format for permits issued to kaolin clay processing plants.

Condition 4.2.1 requires the facility to conduct a performance test within 60 days (no later than 180 days) after achieving the maximum production rate for new or modified equipment subject to the NSPS. Condition 4.2.2 addresses repeating 40 CFR 60 Subpart OOO performance tests within 5 years, for fugitive emissions from affected facilities without water sprays. This only applies to equipment that commence construction, modification, or reconstruction on or after April 22, 2008.

## **V. Monitoring Requirements**

### **A. General Monitoring Requirements**

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

### **B. Specific Monitoring Requirements**

Permit conditions have been updated to reflect the current rules, language, and format for permits issued to kaolin clay processing plants.

Baghouses are used to ensure compliance with the emission limitations of 40 CFR 60 Subpart OOO and Georgia Rule 391-3-1-.02(2)(p). To reasonably assure compliance with applicable PM limitations, a visible emissions (VE) check is required each day of operation of the emissions units controlled by the baghouses per Condition 5.2.2. Corrective actions are required for visible emissions that exceed a specified opacity action level. In addition, Condition 5.2.3 requires a Preventive Maintenance Program for these baghouses. The program requires weekly monitoring of baghouse pressure drop and the performance of operation and maintenance checks on the baghouses. The company is required to keep the VE and Preventative Maintenance Program information to be submitted to the Division upon request. Excursions are to be reported semiannually as specified.

Dust collectors, bin vents and filter receivers controlling emissions from individual bins, wet screening operations, bucket elevators, belt and pneumatic conveyances, vacuum receivers and bagging operations are exempted from detailed monitoring provisions due to little likelihood of significant Particulate Matter emissions.

Condition 5.2.4 requires baghouses that receive gases from sources that dry or calcine to monitor (not record) temperature continuously and to record all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand.

The permit requires all uncontrolled sources except those specifically exempt, be checked daily for obvious mechanical failure and all uncontrolled sources be checked for the presence of visible emissions per Condition 5.2.5. The permit includes requirements to take corrective action and keep records. If problems are revealed during the daily check, they must be reported if not corrected within 24 hours.

Conditions 5.2.6 incorporates 40 CFR 60 Subpart OOO monitoring requirements for affected facilities constructed on or after April 22, 2008.

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

Not Applicable

## **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.

Conditions 6.1.1 through 6.1.6 contain general requirements for the recordkeeping type and duration, reporting of deviations, excess emissions, exceedances, or excursions, quarterly report, sampling records, and record keeping of measurements for monitoring systems (monitoring, calibration, adjustment and maintenance) and performance testing.

Condition 6.1.7 incorporates the applicable reporting requirements for excess emissions, exceedances, excursions or additional information to be included in the semiannual reports required by Condition 6.1.4.

### **B. Specific Record Keeping and Reporting Requirements**

Permit conditions have been updated to reflect the current rules, language, and format for permits issued to kaolin clay processing plants.

Condition 6.2.1 and 6.2.2 requires the facility to comply with the applicable notification, reporting, and recordkeeping requirements in the “General Provisions” of 40 CFR Subpart 60 and 40 CFR 60 Subpart OOO. Condition 6.2.3 requires the facility to maintain a record of all actions taken to suppress fugitive dust.

**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

- Not applicable

## 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.//