

Facility Name: **Cherokee Brick & Tile Company**

City: Macon

County: Bibb

AIRS #: 04-13-02100167

Application #: 692605

Date SIP Application Received: September 21, 2022

Date Title V Application Received: September 21, 2022

Permit No: **3251-021-0167-V-05-1**

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3251-021-0167-V-05-0	April 22, 2022	Title V renewal.

B. Regulatory Status**1. PSD/NSR/RACT**

Cherokee Brick & Tile Company plant is a major source under PSD regulations for Carbon Monoxide (CO). This Macon facility is located in Bibb County, which is designated as attainment for all pollutants under the National Ambient Air Quality Standards (NAAQS). Accordingly, the proposed project will potentially be subject to Prevention of Significant Deterioration (PSD) permitting.

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	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

Application No. 692605 states: “Cherokee Brick is proposing to construct and operate equipment that will allow them to modernize the initial material processing facility at the Macon Facility, henceforth referred to as the mixing plant. The upgraded mixing plant will include two parallel material processing systems, each consisting of eight (8) conveyor belts, a crusher, and a screen bank. The intended purpose of the proposed project is to create redundancy in the facility’s manufacturing process rather than to increase production. The kiln production rate limits the facility’s ability to increase production, and there will be no modifications made to the kiln as part of this project. Therefore, Cherokee Brick is requesting a combined throughput cap of 1,576,800 tons of material per year (tpy) through both lines of the upgraded mixing plant, which corresponds to no observed increases in production as a result of the project.”

B. Emissions Change

The current mixing plant in use at the facility has a maximum throughput of 1,576,800 tons of material per year. The project being completed will not cause an increase to this maximum throughput. However, there are new emission units being installed as part of the project, which is the reason for the emission increases described in the table above. There will be no downstream production increases anticipated as part of this project.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	<21.06	21.06
PM ₁₀	✓	<2.57	2.57
PM _{2.5}	✓	<2.36	2.36
SO ₂	✓		
VOC	✓		
NO _x	✓		
CO	✓		
TRS	n/a		
H ₂ S	n/a		
Individual HAP	✓		
Total HAPs	✓		

C. PSD/NSR Applicability

Cherokee Brick & Tile Company determined that the net emissions increase from the proposed project will not exceed any Significant Emission Rate (SER) of any regulated pollutants; therefore, the proposed modification will not be a major modification under the PSD permitting program. Table 3-1, of Application No. 692605, shows the proposed project emission increases, presented in detail in Section 3 and Appendix A.

III. Facility Wide Requirements**A. Emission and Operating Caps:**

None applicable.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – None associated with the enclosed permit amendment.
Emission and Operating Standards – None associated with the enclosed permit amendment.

C. Compliance Status

The facility did not indicate any non-compliance issues.

D. Permit Conditions

No facility wide requirements are associated with the enclosed permit amendment.

IV. Regulated Equipment Requirements**A. Brief Process Description**

The Macon facility is planning to upgrade its mixing plant to allow for redundancy. The upgraded mixing plant will include two parallel material processing systems, each consisting of eight (8) conveyor belts, a crusher, and a screen bank. Cherokee Brick & Tile Company requested placing an annual throughput limit of 1,576,800 tons of material to avoid triggering PSD permitting. This combined throughput cap of 1,576,800 tons of material per year (tpy) through both lines of the upgraded mixing plant, corresponds to no observed increases in production because of the project.

B. Equipment List for the Process**3.1.1 Additional Emission Units**

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
PC02	Primary Crusher No. 2	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
CS01	Conveyance System No. 1		N/A	None
CS02	Conveyance System No. 2		N/A	None
SB01	Screen Bank No. 1		N/A	None
SB02	Screen Bank No. 2		N/A	None

C. Equipment & Rule Applicability

Emission and Operating Caps –

None except the requested annual throughput limit of 1,576,800 tons through both lines of the upgraded mixing plant, which corresponds to no observed increases in production as a result of the project.

Applicable Rules and Regulations -

Rules and Regulations Assessment: None associated with the enclosed permit amendment.

Emission and Operating Standards: None associated with the enclosed permit amendment.

D. Permit Conditions

New Condition 3.2.2 has been added per Cherokee Brick & Tile Company request. It sets the following limits:

- Cumulative throughput between the Conveyance Systems (CS01 and CS02) shall not exceed 1,576,800 tons per year.
- Cumulative throughput between the Primary Crushers (PC01 and PC02) shall not exceed 1,576,800 tons per year.
- Cumulative throughput between the Screen Banks (SB01 and SB02) shall not exceed 1,576,800 tons per year.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Current Condition 4.2.1 covers required initial NSPS performance testing (for newly added equipment which is subject to 40 CFR 60 Subpart OOO will need to be tested). New Condition 4.2.4 addresses required repeat 40 CFR 60 Subpart OOO performance testing for equipment constructed after April 22, 2008.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Condition 5.2.10 has been added to address monitoring of 40 CFR 60 Subpart OOO equipment constructed after April 22, 2008. In particular, when using a baghouse(s) to control emissions from any affected facility/source constructed, modified, or reconstructed on or after April 22, 2008 Condition 5.2.11 has been added to ensure compliance with the 12-month rolling throughput will not exceed 1,576,800 tons/year limit.

VII. Other Record Keeping and Reporting Requirements

New Conditions 6.1.8 and 6.2.10 have been added for place the record keeping required to track compliance with the 12-month rolling throughput will not exceed 1,576,800 tons/year limit.

New Condition 6.2.11 addresses the notification, reporting, and recordkeeping requirements of 40 CFR 60 Subpart OOO.

VIII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

None applicable.

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/CAIR/CSPAR

None applicable.

I. Prevention of Accidental Releases

None applicable.

J. Stratospheric Ozone Protection Requirements

None applicable.

K. Pollution Prevention

None applicable.

L. Specific Conditions

None applicable.

Addendum to Narrative

The 30-day public review started on October 4, 2022 and ended on November 4, 2022. No Comments were received by the Division. No change was made to the proposed draft permit amendment.