

Facility Name: **Boral Bricks, Augusta Plant 3, 4, & 5**
 City: Augusta
 County: Richmond
 AIRS #: 04-13-245 00009

Application #: TV-18902
 Date Application Received: April 15, 2009
 Permit No: 3251-245-0009-V-03-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Boral Bricks, Augusta Plant 3, 4, & 5** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This 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: Boral Bricks, Augusta Plant 3, 4, & 5
2. Parent/Holding Company Name: Boral Bricks, Inc.
3. Previous and/or Other Name(s)

The facility was designated as Boral Bricks, Augusta Plants 3 & 5. With the addition of Plant 4 (Paver Bricks) the facility is now be designated as Boral Bricks, Augusta Plants 3, 4, & 5.

4. Facility Location

1630 Athern Road
Augusta, Georgia 30901

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

The facility is in an area which is attainment for all pollutants.

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
3251-245-0009-V-02-5		Boral Bricks submitted several comments pertaining to draft permit No. 3251-245-0009-V-02-4 . The comments addressed several issues with regard to demonstrating compliance with the sulfur compliance conditions. As a result of the Division's Title V permitting procedures, Boral Bricks comments, and subsequent removal of TDF as a fuel source, a new permit amendment was issued revoking permit amendment No. 3251-245-0009-V-02-4 .

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
3251-245-0009-V-02-4	Draft issued but, not final permit	REVOKED: Boral Bricks submitted an application to construct and operate a solid fuel gasification process. Gasification is a process that converts carbonaceous materials, such as coal, petroleum, or biomass, into carbon monoxide and hydrogen by reacting the raw material at high temperatures with a controlled amount of oxygen and/or steam. The resulting gas mixture is called synthesis gas or syngas and is itself a fuel.
3251-245-0009-V-02-3	October 24, 2007	The amendment contains changes made to the proposed Part 70 Operating Permit Amendment as a result of comments received during the public comment period. This amendment revoked Amendment No. 3251-245-0009-V-02-2.
3251-245-0009-V-02-2	April 20, 2007	REVOKED: For the construction and operation of a Dry Injection Fabric Filter (DIFF) to control hydrogen fluoride (HF) emissions from Tunnel Kiln #3 Plant 5 (EU05).
3251-245-0009-V-02-1	November 22, 2005	There is no physical modification to this facility. The Title V permit renewal was issued and appealed. As part of settling the appeal, this application and subsequent permit amendment addresses the changing MACT applicability for Tunnel Kiln #1 (P3) (EU01) and Tunnel Kiln #2 (P3) (EU02).
3251-245-0009-V-02-0	October 13, 2004	Title V Renewal
Off-Permit Change	September 30, 2008	Addition of a 125 kW emergency generator to the facility
Off-Permit Change	June 11, 2008	Changes to the Sand and Powder Preparation operations to reduce spillage and improve indoor air quality.
Off-Permit Change	April 24, 2008	Addition of a small baghouse to the exhaust side of the new cyclone (CY02).
Off-Permit Change	December 7, 2007	Reactivate wood hog and transfer screw in the enclosed Transfer Building at Plant 5.
Off-Permit Change	January 23, 2004	Changing part of the dry sawdust system at Augusta Plant 3 and 5 complex. Disconnecting the Sawdust Hammermills (P5) from baghouse DC03, installing a new high efficiency cyclone (CY02) for the Hammermill ventilation system, relocating the baghouse fan to the downstream side of the baghouse, installing fire and explosive protection devices, and removing a discharge hopper and truck loading equipment.

D. Process Description

1. SIC Codes(s): 3251

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 manufactures clay brick.

3. Overall Facility Process Description

The Augusta plant manufactures brick using clay, sawdust, recycled brick, and other body additives. Clay is delivered to the plant by truck. Moist ball clay is unloaded into the facility's primary crusher and carried via conveyor belt to a covered Raw Material Storage ("Clay Storage") Building where it is stockpiled. Sawdust is unloaded from trucks into a sawdust storage area where it is stored until it is transferred by front end loader to a hopper that feeds a belt feeder and enclosed screw conveyor. After the sawdust is transferred to the conveyor, the conveyor transports it to the hammer mill where it is ground and then is collected in a cyclone and delivered to the ground sawdust stockpile. All uncollected particulate matter from the cyclone exits via the cyclone stack. Filler clay and ground sawdust that are shipped in from off site are delivered directly to the Clay Storage Building and stockpiled. Off-spec bricks are carried by truck from the shipment preparation area to an outside stockpile area. When these bricks are needed, they are moved via conveyor to the Clay Storage Building and processed through the hammermill and vibrating screen until a suitable size is achieved so that they may be reintroduced as raw material. As needed, clay, sawdust, and grog are loaded into feeders. These feeders deposit raw materials onto one common belt conveyor. Before shaping into final form occurs, the blend is carried by belt conveyors through a series of preparation machines including a first stage disintegrator, a smooth roller, a second stage disintegrator, a controlled rate additive feeder (used as needed) and finally two pug mills in series. At this point the moisture is controlled by the selective addition of water. The clay, referred to as "pugged" clay, is then extruded as a column. The column is coated and cut into green brick. After the brick columns are cut into individual bricks the brick is then moved onto the kiln cars by a setting machine and placed in a holding room where the moisture is again controlled. Kiln cars then exit the holding rooms directly into one of the dryers. The purpose of these dryers is to further reduce the moisture content of the bricks. The emissions from the dryers have been calculated and have been determined to have insignificant levels of pollutants. The heat applied in the dryers is transferred from the waste heat off the kilns cooling sections. After the bricks leave the dryers they enter the tunnel kilns where they are subject to evaporation of free water, dehydration, oxidation, vitrification, flashing, and cooling. The fuel currently used is natural gas and/or propane. This application would expand fuel types to include synthetic gas. Exhaust from the kiln are controlled with a dry injection fabric filter and then exits via a stack. Brick exiting the kiln are packaged and moved to outside prior to distribution. Wet wood chips (20%-50% moisture content) will be delivered to the Augusta Plant site via truck and unloaded into a covered storage pile.

Boral is also uses other agricultural wastes (corn husks, soybean hulls, etc). Boral expects the same emissions profile as the wood chips when such raw materials are used. The solid

material will then be sized through a three inch oscillating screen and front end loaded into each gasification unit feed hopper. The hopper contents are then conveyed through an enclosed conveyor to an oxygen deprived environment where it is partially combusted creating a syn gas made up of mostly carbon Monoxide (“CO”), Carbon Dioxide (“CO₂”), Methane (“CH₄”), Hydrogen (“H₂”), Steam (“H₂O”), and Nitrogen (“N₂”). The heat content derived from the wet woodchips is estimated to be 8,728 Btu/lb. The heat content of the syn gas may range from 80 to 225 Btu/scf depending on the gasification unit feed type or mixture and moisture content. After exiting the gasification unit, combustion air is misted with the syn gas and piped to the kiln combustion chamber where it is combusted as kiln fuel. Ash from the solid feed used in the gasification unit is periodically sent through an auger tube to an ashbin and disposed of as necessary. Water is used to control any dust or to extinguish any smoking residue embers in the ashbin. Additional heat needed to fire the kiln will come from the combustion of natural gas and/or propane within the kiln combustion chamber. The kiln burner systems will be modified to include the use of low-density gas burners for the combustion of syn gas and natural gas and/or propane inside the kilns. These burners will allow the introduction of fuel gas into lower temperature regions of the kilns and will provide a more controlled operation of combustion. Low-density gas burners function by allowing fuel gas to mix with air immediately followed by ignition inside of the burners. The result is the propulsion of combustion byproducts out of the burner and into the contained kiln. No additional emissions or emission points will occur as a result of the installation of low-density gas burners.

Up to eight gasification units rated at 3.75 MMBTU/hr each may operate up to 100% of the capacity of the kiln, providing approximately 30.00 MMBTU/hr of combined heat input. Normal operating conditions demanded approximately 24 MMBTU/hr of heat input to the kiln. Maximum heat input for Kiln 4 is approximately 30 MMBTU/hr. The additional heat input will be provided by natural gas and/or propane. Under the proposed construction permit, kilns may also operate solely on natural gas and/or propane.

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 a major source as defined in PSD. The facility has PTE over 250 tons per year for CO and SO₂. The facility has not been through a PSD review because there has not been any major expansion since PSD rules were passed in the late 1970's.

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	✓	✓		
SO ₂	✓	✓		
VOC	✓			✓
NO _x	✓			✓
CO	✓	✓		
TRS			n/a	n/a
H ₂ S			n/a	n/a
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The source is major for HAPs and was subject to the Brick and Structural Clay Products MACT or Brick MACT (40 CFR 63 Subpart JJJJJ). The United States Court of Appeals for the District of Columbia vacated the Brick MACT on June 18, 2007. The company has agreed to maintain their current Brick MACT compliance.

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

None applicable.

C. Compliance Status

The facility is operating in compliance with all of the rules or regulations described above.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None.

III. Regulated Equipment Requirements

A. Brief Process Description

A process description is specified in the narrative for Title V Permit No. 3251-245-0009-V-02-0 (see section I.D.3 “Overall Facility Process Description” of that narrative).

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EU01	Tunnel Kiln #1 In Plant 3 (P3)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.3, 3.2.8, 3.4.1, 3.4.2, 3.4.3, 3.2.5, 4.2.1, 4.2.2, 5.2.1, 6.1.7, 6.2.2	None	None
EU02	Tunnel Kiln #2 In Plant 3 (P3)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.3, 3.2.8, 3.4.1, 3.4.2, 3.4.3, 3.2.5, 4.2.1, 4.2.2, 5.2.1, 6.1.7, 6.2.2	None	None
EU05	Tunnel Kiln #3 In Plant 5 (P5)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.4, 3.2.5, 3.2.6, 3.2.7, 3.4.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 5.2.3, 5.2.4, 5.2.9, 5.2.11, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	DIFF	Dry Injection Fabric Filter
EU06	Tunnel Dryer In Plant 5 (P5)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.4.1, 3.4.2, 5.2.1, 6.1.7	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
EU41	Tunnel Kiln #4 In Plant 4 (P4) & Eight Gasification Units	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.2.2, 3.2.8, 3.4.1, 3.4.2, 3.4.3, 3.2.5, 3.2.6, 3.2.7, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.2.8, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.5	CE41	Powdered Hydrated Lime Injection Scrubber with (Venturi Reactor CE41)
HM01	Hammermill	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.7	DC07	Baghouse
CR02	Primary Crusher	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 6.1.7, 6.2.7	None	None
BLT1 (CBAM)	Belt Conveyor	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.7	DC07	Baghouse
BLT2 (CBAM)	Belt Conveyor	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.7	DC07	Baghouse
CY01	Green Sawdust Manufacturing Cyclone	391-3-1-.02(2)(e) 391-3-1-.02(6)(b)	3.4.1, 3.4.2, 5.2.1, 6.1.7	None	None
WF05	Weight Feeder #5 System	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 6.1.7, 6.2.7	None	None
SRAM	Screens	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.7	DC07	Baghouse
SBP4	Surge Bins	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 6.1.7, 6.2.7	None	None
CBP4	Clay Feeder System Conveyor Belts	40 CFR 60 Subpart OOO 40 CFR 60 Subpart A 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.4.1, 3.4.2, 4.2.4, 5.2.1, 6.1.7, 6.2.7	None	None
EU07	Truck Unloading Sawdust Hopper	391-3-1-.02(2)(e) 391-3-1-.02(6)(b)	3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7	DC03	Baghouse
EG	Emergency Generator	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 60 Subpart IIII	3.2.9, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 4.2.4, 5.2.10, 6.1.7, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	N/a	None

C. Equipment & Rule Applicability

Georgia. Rule 391-3-1-.02(2)(b) “Visible Emissions” applies to all sources when no more stringent regulation applies. Visible emissions are limited by this rule to less than 40% opacity. Rule (b) established as Condition 3.4.2.

Georgia Rule 391-3-1-.02(2)(g)2 “Sulfur Dioxide” All fuel burning sources below 100 million BTUs of heat input per hour shall not burn fuel containing more than 2.5 percent sulfur, by weight. All fuel burning sources having a heat input of 100 million BTUs per hour or greater shall not burn a fuel containing more than 3 percent sulfur, by weight.

Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes". Boral Bricks will not cause, let, permit, suffer, or allow particulate emissions from Tunnel Kiln #1 (P3) (EU01), Tunnel Kiln #2 (P3) (EU02), Tunnel Kiln #3 (P5) (EU03), Tunnel Kiln #4 (P4) (EU41), and Tunnel Dryer (P5) (EU06) in total quantities equal to or exceeding the allowable rates specified in the equation below:

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour;

Where; E = emission rate in pounds per hour

P = process input weight rate in tons per hour

NSPS Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants Primary Crusher (CR02), Screens (SRAM), Surge Bins (SBP4), Clay Feeder System Conveyor Belts (CBP4) Hammermill (HM01), 2 NSPS Belt Conveyors (BLT1) and (BLT2) and Screens (DC07) are subject to this part. Particulate matter emissions standard of Subpart OOO which specifies an effected facility that is constructed, modified, or reconstructed after August 31, 1983 is applicable to the aforementioned sources (see original narrative for details.)

40 CFR Part 60, Subpart III - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* applies to the new stationary emergency diesel engine/generator identified as EG (manufactured in 2008).

D. Compliance Status

The facility is operating in compliance with all of the rules or regulations described above.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Table 5: Sections 3.2, 3.3, 3.4, and 3.5

Renewal Condition	Original Condition		Notes
	Number	Permit	
3.2.1	3.2.1	Initial	N/A
3.2.2	3.2.2	Initial	N/A
3.2.3	3.2.3	Amendment - 01	N/A
3.2.4	3.2.4	Amendment - 03	Addition of Dry Injection Fabric Filter (DIFF)
3.2.5	3.3.6	Initial	Conditions renumbered due to removing the vacated MACT Standard.
3.2.6	3.3.7	Initial	
3.2.7	3.3.8	Initial	
3.2.8	3.5.3	Amendment - 05	Condition implemented due to Boral Bricks statement that Tunnel Kiln #1 (P3) (EU01) and Tunnel Kiln #2 (P3) (EU02) shall use only natural gas or propane as a fuel source for processing brick and Tunnel Kiln #4 (P4) (EU41) shall use natural gas, propane, or synthetic gas produced from gasification. Condition moved from 3.5.3 to 3.2.8.
3.2.9	---	Off Permit change	Conditions added reflecting the addition of an emergency generator added September 30, 2008. The emergency generator is subject to 40 CFR Part 60 Subpart III
3.3.1	3.3.1	Initial	N/A
3.3.2	3.3.2	Initial	Modified to include changes associated with condition as amended on April 28, 2009
3.3.3-3.3.7	---	Off Permit change	Conditions added reflecting the addition of an emergency generator added September 30, 2008. The emergency generator is subject to 40 CFR Part 60 Subpart III
3.4.1	3.4.1	Initial	N/A
3.4.2	3.4.2	Initial	N/A
3.4.3	3.4.3	Initial	N/A
3.5.1	3.5.1	Initial	N/A
3.5.2	3.5.2	Initial	N/A

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

The initial performance tests required by 40 CFR 60.8 and the current Air Quality Permit have been completed for all existing equipment. This permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment. If these changes are made, a condition is present to require the initial performance test in accordance with 40 CFR 60.8 and the applicable subpart.

Renewal Condition	Original Condition		Notes
	Number	Permit	
4.2.1	4.2.1	Initial	Condition slightly modified removing the vacated MACT Standard reference.
4.2.2	4.2.2	Initial	N/A
4.2.3	4.2.3	Initial	N/A
4.2.4	4.2.4	Initial	Condition slightly modified removing the vacated MACT Standard reference.

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

Table 6: Section 5.2

Renewal Condition	Original Condition		Notes
	Number	Permit	
5.2.1	5.2.1	Amendment - 03	Revised to include the Dry Injection Fabric Filter (DIFF)
5.2.2	5.2.2	Initial	N/A
5.2.3	5.2.3	Initial	N/A
5.2.4	5.2.4	Initial	Condition modified removing the vacated MACT Standard reference.
5.2.5	5.2.5	Initial	N/A
5.2.6	5.2.6	Initial	N/A
5.2.7	5.2.7	Initial	N/A
5.2.8	5.2.8	Initial	N/A
5.2.9	5.2.9	Amendment - 03	Condition modified removing the vacated MACT Standard reference.
	5.2.10	Amendment - 03	Deleted, incorporated into 5.2.4 & 5.2.11
	5.2.12	Amendment - 03	Deleted Amendment - 03
--	5.2.13	Amendment - 03	Deleted, not needed since the MACT Standard is vacated.
5.2.10	---	---	Condition added reflecting the addition of an emergency generator added September 30, 2008. The emergency generator is subject to 40 CFR Part 60 Subpart III
5.2.11	5.2.11	Amendment - 03	Condition modified removing the vacated MACT Standard reference.

C. Compliance Assurance Monitoring (CAM)

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

- For Initial Applications: Potential controlled emissions of applicable pollutant from unit are at least 100 percent of major source threshold [§64.2(a)(3) and §64.5(a)(1)]
- For Renewal Applications: Potential precontrolled emissions of applicable pollutant from unit are at least 100 percent of major source threshold [§64.2(a)(3) and §64.2(b)]
- For Significant Modifications: Potential controlled emissions of applicable pollutant from unit are at least 100 percent of major source threshold. According to EPA guidance, the types of changes that **could** trigger CAM rule applicability include source owner- or operator- initiated physical changes such as increasing production rate, modifying the monitoring technique, changing to a new fuel or raw material, adding a new process line or control device, increasing the load on the control device by routing additional process exhaust to it, changing the control device, installing new monitoring systems, or changing process of weight rates. [§64.5(a)(2)]
- Unit is not otherwise exempt [§64.2(b)]

The following pollutant specific emission unit(s) (PSEU) is/are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
Tunnel Kiln #4 (P4) (EU41)	Particulate Matter
Tunnel Kiln #4 (P4) (EU41)	HF (HAP)
Tunnel Kiln #4 (P4) (EU41)	HCl (HAP)
Belt Conveyor (CBAM-BLT1)	Particulate Matter
Belt Conveyor (CBAM-BLT2)	Particulate Matter
Screens (SRAM)	Particulate Matter
Truck Unloading Sawdust Hopper (EU07)	Particulate Matter
Hammermill (HM01)	Particulate Matter

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

Table 7: Section 6.1

Renewal Condition	Original Condition		Notes
	Number	Permit	
6.1.1 - 6.1.6	6.1.1 - 6.1.6	Initial	These conditions are general template conditions that describe record keeping and reporting requirements. The conditions have appeared in the initial Title V permit and have been updated as necessary for the renewal.
6.1.7	6.1.7	Amendment - 03	Carried over from amendment -03, modified by moving excess emission conditions to exceedances.
6.1.8	6.1.8	Initial	N/A
6.2.1	6.2.1	Initial	N/A

Renewal Condition	Original Condition		Notes
	Number	Permit	
6.2.2	6.2.2	---	Condition modified removing the vacated MACT Standard reference and yet maintaining requirements.
6.2.3	6.2.3	Initial	Conditions combined and modified removing the vacated MACT Standard reference and yet maintaining requirements
6.2.4	6.2.4	Initial	Conditions combined and modified removing the vacated MACT Standard reference and yet maintaining requirements
6.2.5	6.2.5	Initial	
6.2.6	---	---	Specific conditions relating to the DIFF and CE41 maintenance along with the reporting requirements.
6.2.7	---	---	NSPS Modification requirements.
6.2.8-6.2.11	---	---	Conditions added reflecting the addition of an emergency generator added September 30, 2008. The emergency generator is subject to 40 CFR Part 60 Subpart III
---	6.2.7	Initial	Conditions combined and modified removing the vacated MACT Standard reference and yet maintaining requirements.
---	6.2.8	Initial	
---	6.2.9	Initial	
---	6.2.10	Amendment - 01	
---	6.2.11	Amendment - 01	Modifications made to Section 6 of the permit as a result of an appeal changing the MACT applicability for Tunnel Kiln #1 (P3) (EU01) and Tunnel Kiln #2 (P3) (EU02).
---	6.2.12	Amendment - 01	
---	6.2.13	Amendment - 03	The construction and operation of a Dry Injection Fabric Filter (DIFF) to control hydrogen fluoride (HF) emissions from Tunnel Kiln #3 Plant 5 (EU05).
---	6.2.14	Amendment - 03	
---	6.2.15	Amendment - 03	

VII. Specific Requirements

A. Operational Flexibility

- None.

B. Alternative Requirements

- None.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

- None.

E. Short-Term Activities

- None.

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

- 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.