

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **G-P Gypsum Savannah, GA Plant**

City: Savannah

County: Chatham

AIRS #: 04-13-05100019

Application #: TV-13707

Date SIP Application Received: N/A

Date Title V Application Received: April 2, 2002

Permit No: 3275-051-0019-V-01-0

Program	Review Engineers	Review Managers
SSPP	Mohamed Abdalla	Jimmy Johnston
SSCP	Doug Waldron	Lou Musgrove
ISMP	James Kelly	Larry Webber
TOXICS	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed 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 proposed 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 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 and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3275-051-0019-V-01-0	April 3, 2000	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3275-051-0019-V-01-0	Initial Title V permit.

B. Regulatory Status

1. PSD/NSR/RACT

This Plant is presently classified as a major stationary source as defined by federal Prevention of Significant Air Quality Deterioration (PSD) regulation, 40 CFR §52.21. Specifically, G-P Gypsum Savannah, GA Plant has the potential to emit more than 250 tons per year of, sulfur dioxide, particulate matter, and PM10 (particulate matter less than or equal to 10 micrometers aerodynamic diameter).

2. Title V Major Source Status by Pollutant

Table 3: 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	Yes	No	No
PM ₁₀	Yes	Yes	No	No
SO ₂	Yes	No	No	Yes
VOC	Yes	No	No	Yes
NO _x	Yes	No	No	Yes
CO	Yes	No	No	Yes
TRS	No	No	No	Yes
H ₂ S	No	No	No	Yes
Individual	Yes	Yes	No	No

Table 3: 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
Total HAPs	Yes	Yes	No	No

II. Proposed Modification

A. Description of Modification

This permit amendment is being issued, exclusively, to indicate the applicability of 40 CFR Part 60 Subpart Kb, *"Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984,"* to this facility. The Company has two 19,906 gallon diesel fuel tanks which are currently listed, in Attachment B" of Permit No. 3275-051-0019-V-01-0, under the category of *"petroleum liquid storage tanks with a capacity of less than 40,000 gallons ..."*

B. Emissions Change

This amendment involves no equipment changes thus no emissions changes are anticipated.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂	Yes	0	0
VOC	Yes	0	0
NO _x	Yes	0	0
CO	Yes	0	0
TRS	No	0	0
H ₂ S	No	0	0
Individual HAP	Yes	0	0
Total HAPs	Yes	0	0

C. PSD/NSR Applicability

No PSD issues will arise from issuing the enclosed permit amendment.

III. Facility Wide Requirements

A. Emission and Operating Caps

None associated with the enclosed permit amendment.

B. Applicable Rules and Regulations

40 CFR Part 60 Subpart Kb is the only rule being impacted by this permit amendment. Newly added permit conditions 3.3.2 and 6.2.4 are being introduced for this purpose.

C. Compliance Status

None associated with the enclosed permit amendment.

D. Operational Flexibility

None associated with the enclosed permit amendment.

E. Permit Conditions

Permit conditions 3.3.2 and 6.2.4 are being added to identify 40 CFR Part 60 Subpart Kb as an applicable rule to this facility because it has two tanks, installed in 1999, which are considered as storage vessels with capacities greater than 40 m³ (10,566 gallons).

IV. Regulated Equipment Requirements

A. Brief Process Description

This is a gypsum wallboard manufacturing facility. It uses virgin and recycled gypsum.

B. Equipment List for the Process

Please see Section 3.1, and the Attachments to, of Permit No. 3275-051-0019-V-01-0.

C. Equipment & Rule Applicability

- Emission and Operating Caps – None associated with the enclosed permit amendment.
- Applicable Rules and Regulations - None associated with the enclosed permit amendment except 40 CFR Part 60 Subpart Kb, "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984."

D. Compliance Status

None associated with the enclosed permit amendment.

E. Operational Flexibility

None associated with the enclosed permit amendment.

F. Permit Conditions

None associated with the enclosed permit amendment.

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

A. Individual Equipment: None associated with the enclosed permit amendment.

B. Equipment Groups (all subject to the same test requirements): None associated with the enclosed permit amendment.

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

A. Individual Equipment: None associated with the enclosed permit amendment.

B. Equipment Groups (all subject to the same monitoring requirements): None associated with the enclosed permit amendment.

VI. Other Record Keeping and Reporting Requirements

New condition 6.2.4 is being added to specify the applicable reporting portion of 40 CFR Part 60 Subpart Kb.

VII. Specific Requirements

A. Operational Flexibility

None associated with the enclosed permit amendment.

B. Alternative Requirements

None associated with the enclosed permit amendment.

C. Insignificant Activities

None associated with the enclosed permit amendment.

D. Temporary Sources

None associated with the enclosed permit amendment.

E. Short-Term Activities

None associated with the enclosed permit amendment.

F. Compliance Schedule/Progress Reports

None associated with the enclosed permit amendment.

G. Emissions Trading

None associated with the enclosed permit amendment.

H. Acid Rain Requirements

None associated with the enclosed permit amendment.

I. Prevention of Accidental Releases

None associated with the enclosed permit amendment.

J. Stratospheric Ozone Protection Requirements

None associated with the enclosed permit amendment.

K. Pollution Prevention

None associated with the enclosed permit amendment.

L. Specific Conditions

None associated with the enclosed permit amendment.

Addendum to Narrative

No comments were received from EPA, the company, or the public. Accordingly, the permit stands as it was issued in its original draft format.