

TITLE V MINOR MODIFICATION APPLICATION REVIEW - NO CONSTRUCTION

Facility Name: Georgia Iron Works, Grovetown Plant

City: Grovetown

County: Columbia

AIRS #: 04-13-073-00004

Application #: TV-12933

Date SIP Application Received: Not Applicable - No Construction

Date Title V Application Received: April 9, 2001

Permit No: 3561-073-0004-V-01-1

Program	Review Engineers	Review Managers
SSPP	Susan Jenkins	James Capp
SSCP	Doug Waldron	Lou Musgrove
ISMP	Bradley Belflower	Larry Webber
TOXICS	Not Applicable	Not Applicable

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached 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 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 participation and/or 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 to that permit. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3561-073-0004-V-01-0	January 8, 2001	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3561-073-0004-V-01-0	Initial Title V Permit

B. Regulatory Status

1. PSD/NSR

This facility is classified as one of the 28 named source categories in the PSD regulations because it is a secondary metal production facility. The foundry is a major source because it has the potential to emit more than 100 tons per year of at least one pollutant regulated by the PSD regulations.

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	Yes	No	No	Yes
H ₂ S	Yes	No	No	Yes
Individual HAP	Yes	Yes	No	No
Total HAPs	Yes	Yes	No	No

II. Proposed Modification

A. Description of Modification

Georgia Iron Works (GIW) inadvertently noted that Core Making activities CM01 through CM07 and Mol Making activities MM01 through MM02 and MM04 vent uncontrolled to the atmosphere. These units actually vent to existing baghouse/fabric filter CD03. This clarification needs to be updated in Condition 3

GIW inadvertently counted under SG01 (Shakeout Screen) a separate classifier box. GIW requests that the classifier box be identified as SG04 and added as a new entry in Condition 3.1.

GIW inadvertently noted that shot blasting booth SG03 vents to the atmosphere. It is actually part of a closed loop. Air is pulled from SG03 across a cartridge filter (CD02) and re-circulated back into booth SG03. As a result, GIW requests that the entry for SG03 in Condition 3.1 be transferred to Attachment B - Generic Emissions Group. In addition, filter CD02 should be removed from Condition Nos. 5.2.1, 5.2.2 and 5.2.3.

GIW inadvertently noted that baghouse/fabric filter CD01 was one unit which controlled emissions from booths SG01 and SG02. Actually, there are three distinct baghouse/fabric filter units instead identified as CD01A, CD01B, and CD01C. Booth SG01 vents to CD01B. Booth SG02 vents to CD01C. Booth SG04 vents to CD01A. GIW requests that Condition Nos. 3.1, 5.2.1, 5.2.2, and 5.2.3 be revised accordingly.

GIW inadvertently omitted the presence of a 30,000-gallon propane storage tank from their initial Title V application in 1996. GIW requests that this tank be added to Attachment B - Insignificant Activities Based on Emission Levels.

GIW informed the Division that heat treating furnace FG03 has been removed from service. Therefore this source code needs to be removed from Condition 3.1 and 3.4.3.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
PM	Yes	0	0	Y
PM ₁₀	Yes	0	0	Y
SO ₂	Yes	0	0	Y
VOC	Yes	0	0	Y
NO _x	Yes	0	0	Y
CO	Yes	0	0	Y
TRS	Yes	0	0	Y
H ₂ S	Yes	0	0	Y

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
Individual HAP	Yes	0	0	Y
Total HAPs	Yes	0	0	Y

C. PSD/NSR Applicability

The permit revisions noted above do not trigger PSD/NSR Applicability.

III. Facility Wide Requirements

Not Applicable.

IV. Regulated Equipment Requirements

Condition Nos. 3.1 and 3.4.3 are revised to account for corrections and equipment removal.

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

Not Applicable.

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

Condition Nos. 5.2.1, 5.2.2, and 5.2.3 are revised for corrections and equipment removal.

VI. Other Record Keeping and Reporting Requirements

Not Applicable.

VII. Specific Requirements

Not Applicable.

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Closing Block: We have reviewed and recommend issuance of draft/proposed Permit No.3561-073-0004-V-01-1

Program	Review Engineers	Dates	Review Managers	Dates
SSPP				
SSCP	Not Applicable	NA	Not Applicable	NA
ISMP	Not Applicable	NA	Not Applicable	NA
TOXICS	Not Applicable	NA	Not Applicable	NA

Stationary Source Permitting Program Manager

Date