

Facility Name: **Georgia Iron Works, Grovetown Plant**
 City: Grovetown
 County: Columbia
 AIRS #: 04-13-073-00004

Application #: TV-14004
 Date SIP Application Received: Received September 16, 2002 as letter dated September 11, 2002
 Date Title V Application Received: September 16, 2002
 Date of Draft Permit: November 27, 2002
 Permit No: 3561-073-0004-V-01-2

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached SIP permit to construct and/or draft/proposed operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit amendment is to identify state and federal air requirements applicable to the modification/construction to be performed at Georgia Iron Works and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It initially describes the facility receiving the permit amendment, 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 amendment 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. 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. 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	
3561-073-0004-V-01-1	October 12, 2001	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3561-073-0004-V-01-0	Initial Title V Permit
3561-073-0004-V-01-1	Minor Modification without Construction

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

The facility 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. Note: This facility is classified as one of the 28 named source categories in the PSD regulations because it is a secondary metal production facility.

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	X		
PM ₁₀	Yes	X		
SO ₂	Yes			X
VOC	Yes			X
NO _x	Yes			X
CO	Yes			X
TRS	Yes			X

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
H ₂ S	Yes			X
Individual HAP	Yes	X		
Total HAPs	Yes	X		

Regulatory Analysis

II. Proposed Modification

A. Description of Modification

The applicant operates a shake out screen (emission unit ID No. SG01), floor shakeout (emission unit ID No. SG02), and a classifier box (emission unit ID No. SG04) which exhaust to the atmosphere through baghouses. Unit SG01 currently exhausts through baghouse CD01B. Unit SG02 currently exhausts through baghouse CD01C. Unit SG04 currently exhausts through baghouse CD01A. The applicant requests authorization to replace baghouses CD01B and CD01C with a newer and more efficient baghouse (assigned ID No. CD01B). The construction of the new baghouse is what classifies this modification as one “*with construction.*”

In addition, the applicant requests authorization to re-route the exhaust from SG01 to existing baghouse CD01A.

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)
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	Yes	0	0
H ₂ S	Yes	0	0
Individual HAP	Yes	0	0

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
Total HAPs	Yes	0	0

C. PSD/NSR Applicability

The replacement of the two baghouses with one newer and more efficient baghouse does not trigger PSD/NSR applicability. Re-routing the exhaust from SG01 to an existing baghouses does not trigger PSD/NSR applicability.

III. Facility Wide Requirements

This subsection is not applicable to this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

There is no change to the process description.

B. Equipment List for the Process

The modified emission units are identified below:

Emission Units			Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Process Group	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SG01	Shakeout Screen	S/O	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Same as for CM01	CD01A	Baghouse
SG02	Floor Shakeout	S/O	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Same as for CM01	CD01B	Baghouse
SG04	Classifier Box	S/O	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Same as for CM01	CD01B	Baghouse

C. Equipment & Rule Applicability

There are no changes to equipment and rule applicability.

D. Compliance Status

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

E. Operational Flexibility

Not applicable.

F. Permit Conditions

Section 3.1 is modified.

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

This subsection is not applicable to this modification.

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

The reference to baghouse with ID No. CD01C is removed from Condition Nos. 5.2.1, 5.2.2 and 5.2.3. The new baghouse with ID No. CD01B is subject to the same periodic monitoring requirements as with the older baghouse with the same ID No.

VII. Other Record Keeping and Reporting Requirements

This subsection is not applicable to this modification.

VIII. Specific Requirements

This subsection is not applicable to this modification.

IX. General Provisions

Condition 8.23.1 is added.

Addendum to Narrative

Georgia EPD issued final construction and proposed Part 70 Operating Permit Amendment No. 3561-073-0004-V-01-2 on December 17, 2002 to Georgia Iron Works located in Grovetown, Georgia (Columbia County) for the construction and operation of a baghouse (emission unit ID No. CD10B) to control emissions from the floor shakeout (emission unit ID No. SG02) and the classifier boxes (emission unit ID No. SG04); the re-routing of the exhaust from the shakeout screen (emission unit ID No. SG01) to baghouse with ID No. CD01A; and the revision of Section 3.1 and Condition Nos. 5.2.1, 5.2.2, and 5.2.3 and the addition of Condition 8.23.1.

Prior to the incorporation into the Part 70 Permit as a minor modification, EPA and affected states were notified of the proposed modification on December 18, 2003. They were allowed a 45-day period in which to review the proposed permit amendment. The 45-day review period ended on February 1, 2003. No comments were received.