

TITLE V APPLICATION REVIEW

Facility Name: Thiele Kaolin Company, Reedy Creek

City: Wrens

County: Glascock

AIRS #: 04-13-125-00001

Application #: TV- 9248

Date Application Received: October 23, 1996

Date Application Deemed Administratively Complete: April 22, 1997

Date of Draft Permit: _____

Permit No: 3295-125-0001-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Stephan Neadow	James Current
SSCP/ASU	Richard McDonald	Lou Musgrove
ISMP	DeAnna Garrison	Larry Webber
TOXICS	Art Stelson	Heather Abrams

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Thiele Kaolin Company, Reedy Creek Plant** 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Thiele Kaolin Company, Reedy Creek Plant
2. Parent/Holding Company Name: Thiele Kaolin Company
3. Previous and/or Other Name(s)

None.

4. Facility Location

Highway 296 North
 Wrens, Georgia 31082
 (Glascock County)

5. Attainment or Non-attainment Area Location

The facility is not located in a non-attainment area.

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area.

B. Site Determination: None.

C. Existing Permits

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
3295-062-4465-0	April 24, 1996		X
3295-062-4465-0	January 24, 1995		X
3295-062-4465-0	December 30, 1991		X
3295-062-4465-0	October 14, 1988		X
3295-062-4465-0	August 12, 1981		X
3295-062-4465-0	August 5, 1980		X
3295-062-4465-0	July 30, 1980		X
3295-062-7342-0	February 13, 1980	X	

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
3295-062-7215-C	January 17, 1980	X	
3295-062-4893-C	September 1, 1976	X	
3295-062-4465-0	March 5, 1976		X

Table 2: Comments on Specific Permits

Permit Number	Comments
3295-062-4465-0	None.
3295-062-7342-0	Never Revoked.
3295-062-7215-C	Never Revoked.
3295-062-4893-C	Never Revoked.

D. Process Description

1. SIC Code(s)

Major - 3295
Other - 1455

2. Description of Product(s)

The facility processes kaolin.

3. Overall Facility Process Description

Thiele Kaolin Company (Thiele) operates a kaolin clay processing facility located in Wrens, Washington County, Georgia. The Thiele Reedy Creek Plant is comprised of various kaolin clay processing operations including fractionation, leaching, filtration, grinding, drying, calcining, milling, intermediated and final product conveying and storage, bagging and bulk product loading, and ancillary support activities.

4. Overall Process Flow Diagram

The process and flow diagrams are included in the application.

E. Regulatory Status

1. PSD/NSR

The facility is not subject to PSD/NSR review.

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	T	T		
PM ₁₀	T	T		
SO ₂	T			T
VOC	T			T
NO _x	T			T
CO	T			T
TRS				
H ₂ S				
Individual				
Total				

3. MACT Standards

The facility is not subject to any MACT standards.

4. Program Applicability

Table 4

Program Code	Applicable (Yes/No)
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.

B. Applicable Rules and Regulations

None.

C. Compliance Status

The facility is operating in compliance.

D. Operational Flexibility

Not applicable.

E. Permit Conditions

None.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility processes kaolin.

B. Equipment List for the Process

Table 3.1

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
B1	Boiler No. 1 (Old Boiler)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.4.3, 3.4.4, 3.4.6, 5.2.7	--	None
B2	Boiler No. 2 (New Boiler)	391-3-1-.02(2)(d) NSPS Subpart Dc	3.3.3, 3.4.3, 3.4.5, 5.2.7, 5.2.8, 3.5.3	--	None
ACM	Air Float 200 ACM Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	ACMC	Baghouse
AM60	Air Float 60 ACM Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	30BC	Baghouse

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
30B	30 Ton Bin Air Float Bagging	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	30BC	Baghouse
CM1	Air Float Cage Mill No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	CMC1	Baghouse
CM2	Air Float Cage Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	CMC2	Baghouse
RM1	Air Float Raymond Roller Mill No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1, 3.4.2, 3.5.5	RMC1	Baghouse
RM2	Air Float Raymond Roller Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1, 3.4.2, 3.5.5	RMC2	Baghouse
SD1	Spray Dryer No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)	3.4.1, 3.4.2, 3.5.4, 5.2.4 3.4.6, 5.2.7	DC1	Baghouse
SD2	Spray Dryer No. 2	391-3-1-.02(2)(p) NSPS UUU	3.4.1, 3.3.2, 5.2.1, 5.2.4, 5.2.7	DC2	Baghouse
BE1	Spray Dryer No. 2 Bucket Elevator and Belt Conveyors #1	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	CR2	Baghouse
BE2	Bucket Elevator #2. Product Silo to Bin BN1A	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	R43	Baghouse
BG1	Spray Dryer Bagging Machine	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	R62	Baghouse
BN1	Spray Dryer No. 2 Surge Bin	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	CR2	Baghouse
BN2	One Ton Bagging from Bin BN2	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	R63	Baghouse
BS1	Spray Dryer Bagging Scavenger	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	R61	Baghouse
LP2	Spray Dryer No. 2 Railcar Loading	391-3-1-.02(2)(p) NSPS OOO	3.4.1 3.3.1	DC2	Baghouse
AS1	Silo No. #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	ASC1	Bin Vent
AS2	Silo No. #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	ASC2	Bin Vent
AS3	Silo No. #3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	ASC3	Bin Vent
DS1	Spray Dryer Silo No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	DSC1	Bin Vent
DS2	Spray Dryer Silo No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	DSC2	Bin Vent
DS3	Spray Dryer Silo No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	DSC3	Bin Vent
DS4	Spray Dryer Silo No. 4	391-3-1-.02(2)(b)	3.4.1	DSC4	Bin Vent

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
		391-3-1-.02(2)(p)	3.4.2		
DS5	Spray Dryer Silo No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	DSC5	Bin Vent
CB1	Chemical Bin #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	CBC1	Bin Vent
CB2	Chemical Bin #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	CBC2	Bin Vent
AM1	Air Float Slurry Makedown	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	AMC1	Bin Vent
AFB	Air Float Bagging from Silos 1-3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	AFBC	Baghouse
BR1	Spray Dryer Bagging Reclaim	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	BRC1	Baghouse
BM1	Spray Dryer Bagging Machine	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	3.4.1 3.4.2	BMC1	Baghouse

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

! Emission and Operating Caps

None.

! Applicable Rules and Regulations -

1. 40 CFR, Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants"
 This regulation is listed in the permit as Condition 3.3.1. All of the equipment in Table 3.1 subject to this regulation is identified in the column, **ACorresponding Permit Condition@**. In order for 40 CFR, Part 60, Subpart OOO to be applicable, the emission sources will meet the following criteria:

- a. Be identified as a crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station.
- b. Be constructed, reconstructed, or modified after August 31, 1983.

Emission requirements associated with this rule include no visible fugitive emissions greater than 10 percent opacity. Stack emissions will not contain particulate matter in excess of 0.05 g/dscm (0.02 grains/dscf) and exhibit greater than 7 percent opacity.

2. 40 CFR, Part 60, Subpart UUU, "Standards of Performance for Calciners and Dryers in Mineral Industries," This regulation is listed in the permit as Condition 3.3.2. All of the equipment in Table 3.1 subject to this regulation is identified in the column listed as, **ACorresponding Permit Condition@**. This

includes **Spray Dryer No. 2 (SD2)** permitted on January 24, 1995. In order for 40 CFR, Part 60, Subpart UUU to be applicable, the emission sources will have been constructed, reconstructed, or modified after April 23, 1986.

Emission requirements associated with this rule include any gases which contain particulate matter in excess of 0.04 grains/dscf (0.092 grams/dscm) for calciners and calciners and dryers installed in series. For dryers which stand alone, the emissions will not contain particulate matter in excess of 0.025 grains/dscf (0.057 grams/dscm). For both series and parallel operations, the opacity is limited not to exceed 10 percent opacity.

3. 40 CFR Part 60, Subpart Dc "Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units". This regulation is listed in the permit as Condition 3.3.3. All of the equipment in Table 3.1 subject to this regulation is identified in the column listed as, **ACorresponding Permit Condition@**. This includes **New Boiler No. 2 (B2)** permitted on December 30, 1991.
4. Georgia Rule 391-3-1-.02(2)(p), "Particulate Emissions from Kaolin and Fuller's Earth Processes," This regulation is listed in the permit as Condition 3.4.1. All of the equipment in Table 3.1 subject to this regulation is identified in the column listed as, **ACorresponding Permit Condition@**. For this regulation, particulate matter emissions will not equal to or exceed the allowable rates specified in the below equations:
 - a. For equipment constructed or extensively modified after January 1, 1972, the following equations is used to determine allowable emission rates:
 - i. $E = 3.59 P^{0.62}$, for process input weight rate up to and including 30 tons per hour;
 - ii. $E = 17.31 P^{0.16}$, for process input weight rates in excess of 30 tons per hour.
 - b. For equipment constructed or put in operation on or before January 1, 1972, the following equations is used to determine allowable emission rates:
 - i. $E = 4.1 P^{0.67}$, for process input weight rate up to and including 30 tons per hour;
 - ii. $E = 55 P^{0.11} - 40$, for process input weight rates in excess of 30 tons per hour.

In the above equations: E = allowable emission rate in pounds per hour; and
P = process input weight rate in tons per hour.

5. Georgia Rule 391-3-1-.02(2)(b)1 **AVisible Emissions@**This is a general permitting requirement which applies to all facilities. This regulation is listed in the permit as Condition 3.4.2. All of the equipment in Table 3.1 subject to this regulation is identified in the column listed as, **ACorresponding Permit Condition@**. Visible emissions will not equal or exceed forty (40) percent.
6. Georgia Air Quality Control Rule 391-3-1-.02(2)(d)(i) **AFuel-burning Equipment@** This is a general permitting requirement which applies to all facilities with fuel burning equipment. This regulation is listed in the permit as Condition 3.4.4. All of the equipment in Table 3.1 subject to this regulation is identified in the

column listed as, **Corresponding Permit Condition**. For **Old Boiler No. 1 (B1)**, the particulate matter emissions will not exceed 0.5 pounds per million BTUs.

7. Georgia Air Quality Control Rule 391-3-1-.02(2)(d)(i) **Fuel-burning Equipment** This regulation is listed in the permit as Condition 3.4.5. All of the equipment in Table 3.1 subject to this regulation is identified in the column listed as, **Corresponding Permit Condition**. From **New Boiler No. 2**, the particulate matter emissions will not exceed the rate derived from $E = 0.5*(10/R)^{0.5}$, nor be in excess of 0.28 lbs/10⁶ BTU heat input under any operating conditions.

where: E = allowable particulate emission rate in pounds per million Btu heat input
& R equals the heat input in million Btu per hour.

8. Georgia Rule 391-3-1-.02(2)(d) **Fuel-burning Equipment** The Permittee will not discharge or cause the discharge into the atmosphere from the **Old Boiler and New Boiler (B1, and B2)** any gases which exhibit 20 percent opacity or greater, except for one six-minute period per hour of not more than 27 percent opacity as identified in condition No. 3.4.3.
9. Georgia Rule 391-3-1-.02(2)(g) **Sulfur Dioxide** This requirement is listed in the permit as Condition 3.4.4. Each listed piece of equipment in Table 3.1 subject to this requirement is identified under the column listed, **Corresponding Permit Condition**. This requirement includes all fuel burning sources below 100 million BTU's 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 BTU's per hour or greater shall not burn a fuel containing more than 3 percent sulfur, by weight.

D. Compliance Status

The facility is currently operating in compliance.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

1. The Permittee will operate all baghouses at all times associated with controlling particulate matter emissions from kaolin production.
2. The Permittee will maintain an adequate inventory of replacement filter bags for all other baghouses.
3. **No. 2 Spray Dryer (SD2) or New Boiler (B2)** will be limited such that the total uncontrolled emissions of sulfur dioxide from either does not equal or exceed 40 tons during any 12 consecutive months. The sulfur content of fuel oil will not exceed 0.5% weight percent and the consumption of fuel oil from either does not exceed 1.08 million gallons during any 12 consecutive month period. This is to avoid PSD.

4. **Spray Dryer No. 1 (SD1)** will not discharge or cause the discharge into the atmosphere from particulate matter in excess of 20.7 pounds per hour.
5. **Air Float Raymond Roller Mills Nos. 1 and 2 (RMC1 and RMC2)** will be limited such that the sulfur content of fuel oil shall not exceed 0.5% weight percent.

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

A. General Testing Requirements

This permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

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 be performed in accordance with 40 CFR 60.8 and the applicable Subpart.

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

A. General Monitoring Requirements

This permit specifies that any monitoring systems installed should be in continuous operation and that downtime due to maintenance should be minimized.

B. Specific Monitoring Requirements

Spray Dryer No. 2 (SD2) is subject to 40 CFR, Part 60, Subpart UUU and is controlled by a baghouse. Subpart UUU requires that a dryer equipped with a dry control device have a Continuous Opacity Monitoring System (COMS). The COMS is sufficient monitoring to assure compliance from this dryer with the applicable limits.

Other sources at the plant are controlled by baghouses. These sources include various feed and storage silos, grinding mills, and dryers. The existing SIP permit requires that all baghouses have pressure drop indicators and all baghouses that receive gases at higher than ambient air temperature have temperature indicators. This Title V permit uses a different monitoring strategy. Visible emissions is a better indicator of baghouse condition and performance, and the temperature in some baghouses is due to friction from grinding and would not cause significant bag degradation. Small baghouses and those baghouses which operate infrequently are not required to do detailed monitoring due to little likelihood of significant particulate matter emissions.

On the larger frequently operated baghouses, visible emissions are checked at least once each day of operation. The visible emissions must be below a given opacity action level or corrective action is required. The opacity action levels vary based on the particulate matter emission limits (i.e. NSPS or SIP). Sources with higher particulate matter emission limits have higher opacity action levels. The opacity action levels are, however, lower than the opacity limitations in the SIP visible emissions rule and NSPS. The opacity action levels selected correspond to properly operated baghouses which are indicative of compliance with the applicable particulate matter standard. A Preventive Maintenance Program is also required on the larger frequently operated baghouses. The program requires weekly monitoring of pressure drop and maintenance checks. The baghouses receiving gases from combustion sources are also required to monitor (not record) temperature continuously and to record all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand. Each time that problems are revealed by the visible emissions check are not corrected within 24 hours and each time that the temperature exceeds the specified level must be reported as an excursion. The information gathered by the Preventive Maintenance Program is not reported on any set schedule. This information is retained by the Permittee and must be provided upon request by the Division.

The permit requires all uncontrolled sources except boilers and air heaters be checked daily for obvious mechanical failure and for the presence of visible emissions. The permit includes a requirements to take corrective action and keep records. If problems are revealed during the daily check, they must be reported if not corrected within 24 hours.

The facility also has two boilers subject to Georgia Rules 391-3-1-.02(2)(b) and (d) that burn No. 2 fuel oil and natural gas. The other fuel burning sources at the facility burn either No. 2 fuel oil, natural gas, or both. The current permit limits all fuel oil to 0.5 percent sulfur or less. The permit requires the facility to obtain fuel supplier certifications that the fuel oil is distillate oil (ASTM D396 numbers 1 and 2) for each shipment of fuel oil received to be burned in any fuel burning source, thereby demonstrating compliance with this limit. In Georgia the sulfur content of natural gas is insignificant, so no monitoring is required. Particulate matter emissions from combustion of distillate fuel oil and natural gas is also insignificant, so no additional monitoring is required.

Record keeping and Reporting Requirements

Records, including identification of any exceedances or excursions from applicable monitoring triggers, the cause of such occurrence, the corrective action taken, and the certifications that fuel oil received is distillate oil, and only distillate oil is burned are required to be kept by the Permittee and reporting is required on a semiannual basis.

The facility is subject to an annual fuel consumption limit for No. 2 fuel oil. Therefore, the fuel burning sources, including the boilers, are required to monitor and record the amount of fuel oil combusted each month and include this information in the semiannual report.

Boiler B2 is also required to keep monthly records of the quantity of natural gas combusted to assure compliance with 40 CFR 60, Subpart Dc.

VI. Other 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 related information to deviations from applicable requirements.

VII. Specific Requirements

A. Operational Flexibility

☐ Not applicable.

B. Alternative Requirements

☐ Not applicable.

C. Insignificant Activities

☐ refer to ' 4.10 of the Title V permit application

D. Temporary Sources

☐ Not applicable.

E. Short-Term Activities

☐ Not applicable.

F. Compliance Schedule/Progress Reports

☐ Not applicable.

G. Emissions Trading

☐ Not applicable.

H. Acid Rain Requirements

☐ Not applicable

I. Prevention of Accidental Releases

☐ Not applicable.

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J. Stratospheric Ozone Protection Requirements

C Not applicable.

K. Pollution Prevention

C Not applicable.

L. Specific Conditions

C Not applicable.

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.

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Closing Block: We have reviewed and recommend issuance of draft Permit No. 3295-125-0001-V-01-0

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date

Addendum to Narrative

Thiele Kaolin Company, Reedy Creek Plant, TV-9248

Comments:

1. The Standard Industrial Classification (SIC) given and that used as part of the permit number is incorrect. The correct SIC for this facility is 1455. This is the SIC that has been submitted on all our applications and has been accepted by the EPD and EPA for the previous 25 years. Thiele mines all of its basic raw material (i.e. kaolin) which is used at its plant. As such the proper SIC is 1455.

Division=s Response: SIC Code identification removed from cover page.

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. EPD acknowledges that SIC codes 1455 and 3295 may both apply.

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. (Section 1.3) The facility is located in Glascock County not Washington County. Also, the facility does not have a calciner, therefore the term "calcining" should be deleted from the list of process operations.

Division=s Response: Division agrees, changes made.

3. (Section 2.2) Typographical - Sentence has extra "with" in it.

Division=s Response: Division agrees, changes made.

4. (Section 5.2.2) We believe there are no provisions in Clean Air Act amendments requiring nor is it **practicable** because of varying operational schedules and weather conditions to perform visible emission checks daily. Weekly visible emission (VE) checks should be sufficient monitoring to insure that control equipment is meeting applicable standards on a periodic basis.

Division=s Response: Division disagrees, no changes made. The division believes daily visible emission (VE) checks are necessary to insure specific control equipment is meeting applicable standards.

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5. (Section 5.2.2(b)) This provision is counter to provisions of Clean Air Act Amendments of 1990 (CAAA90) that prohibits more stringent emission limits than those in existing permits. The "greater than or equal to 5 percent equates to a zero opacity limit for sources with up to 10% VE opacity and the 10% limits for sources with up to 40% opacity present limits reduces them to a 10% opacity limit. We propose that NSPS source have action limit of greater than 5%, 20% opacity permitted sources have action limit of greater than 10%, and 40% opacity permitted sources have limit of 20%. The first sentence should delete "at any time during the determination" as is based on 3-minute average.

Division=s Response: Division disagrees, no changes made. The division views these opacity action limits necessary and may assist in identifying potential control device failures.

6. (Section 5.2.2(c)) The term "excursion", wherever it appears under c., replaced with phrase "opacity above specified action level". The term "pressure drop" should be deleted, as under most of our present permits pressure gauges are not a requirement.

Division=s Response: Division disagrees, no changes made. EPD defines an excursion as Any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of monitoring@ and thus will not depart from this nomenclature.

Condition 5.2.2(c) includes only applicable requirements for pressure drop gauges. The Division believes pressure drop indicators are an instrument which may assist in identifying potential failures.

7. (Section 5.2.3) There is no provision in CAAA-90 for maintenance plan to be subject for approval or modification by the permitting authority if a facility is meeting all applicable standards. The use of "pressure drops" should be deleted as they are not present permit requirements. Additionally they are not necessary indicative of compliance with a regulated parameter and would at best only indicate a major failure which would have been already detected by other methods.

Division=s Response: Division disagrees, no changes made. The Division believes pressure drop indicators are an instrument which may assist in identifying potential failures.

8. (Section 5.2.3.(a)) Same as above statement for 5.2.3.

Division=s Response: Division disagrees, no changes made. The Division believes pressure drop indicators are an instrument, which may assist in identifying potential failures.

9. (Section 5.2.5) Same as comment for 5.2.2. We believe there are no provisions in Clean Air Act amendments requiring nor is it **practicable** because of varying operational schedules and weather conditions to perform visible emission checks daily. Weekly visible emission (VE) checks should be sufficient monitoring to insure that control equipment is meeting applicable standards on a periodic basis.

Division=s Response: Division disagrees, no changes made. The division believes daily visible emission (VE) checks are necessary to insure specific control equipment is meeting applicable standards.

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10. (Section 5.2.5(a)) Uncontrolled emissions are allowed 20% opacity action limit should be minimum of 10%.

Division=s Response: Division disagrees, no changes made. This condition mainly applies to newly installed equipment as referenced in condition 7.1.2 and thus will include NSPS limits.

11. (Section 5.2.5(b)) Same as comment for 5.2.5a.

Division=s Response: Division disagrees, no changes made. This condition mainly applies to newly installed equipment as referenced in condition 7.1.2 and thus will include more stringent NSPS limits.

12. (Section 5.2.7) There are presently no requirements to record fuel oil use individually for SD1, Boiler 1, or the Cage & Roller Mills. We do, however, keep total plant usage for permit fee purposes. We therefore ask that this be the requirement for this part.

Division=s Response: Division disagrees, no changes made. These records are necessary to verify that PSD applicability limits are not exceeded.

13. (Section 5.2.9(c)(i)) Strike word "required".

Division=s Response: Division agrees, changes made.

14. (Section 5.2.9(c)(ii)) Replace "any visible emissions" with "emissions above opacity action level".

Division=s Response: Division disagrees, no changes made. This is standard language in permits of this type.

15. (Section 5.2.9(c)(iii)) Remove this in its entirety as this does not, in any way, constitute a violation or permit limit. It is only to be used for maintenance guidance.

Division=s Response: Division disagrees, no changes made.

16. (Section 5.2.9(c)(iii)) Remove this in its entirety as this does not, in any way, constitute a violation, excursion, etc., of a permit limit or requirement. This information is to be used only for maintenance guidance. [Note: this is second comment on 5.2.9(c)(iii)]

Division=s Response: Division disagrees, no changes made. The division believes elevated gas temperatures above Anormal operation range@entering a baghouse may indicate potential failures.

17. (Section 5.3.1) This paragraph states reports are to be submitted quarterly. Section 5.3.6 states they are semiannual reports. This is also stated in 5.3.5. We request semiannual reports of quarterly results.

Division=s Response: Division disagrees, no changes made. The division believes quarterly reports are necessary for a facility of this type. 5.3.5 and 5.3.6 have been corrected to say "quarterly".

TITLE V APPLICATION REVIEW

18. (Section 5.3.5) Change to require reporting of plant total fuel oil usage and not by individual processes unless otherwise required under present permits.

Division=s Response: Division disagrees, no changes made. These records are necessary to verify that PSD applicability limits are not exceeded.

19. (Section 6.1.1) Statement should be added that maintenance of 5 year record keeping requirement begins with date of issuance of Title V permit. Records prior to this date are to be maintained for two years.

Division=s Response: Division disagrees, no changes made. Title V requires 5 years of record keeping to verify compliance.

20. (Section 6.1.2) First and second paragraph. There is no definition of Adeviation@in permit. Condition should simply require reporting of any excessive emission within 7 days of occurrence when period exceeds 4 hours.

Division=s Response: Division disagrees, no changes made. For the purpose of this condition, deviation is defined as a malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions. Excessive emissions are defined by 391-3-1-.01(w). The division believes the condition is sufficiently explained.

21. (Section 6.2.3) The reporting (and presumably the limit) of a 1/12 the annual consecutive limit needs to be deleted as there are no regulations to establish this limit and none are in our present permits. This should state that a report is to be submitted whenever "the consecutive 12-month consecutive limit is exceeded".

Division=s Response: Division disagrees, no changes made. This provision is required to alert the company and the Division of a possible future violation of 3.5.3 and informs the division of the steps the permittee will take to prevent an actual violation of condition 3.5.3.