

Part 70 Operating Permit Amendment

Permit Amendment No.: **3295-129-0028-V-04-2** Effective Date: **November 15, 2005**

Facility Name: **J. M. Huber – Fairmount**

Facility Address 187 Gordon Street
Fairmount, Georgia 30139 (Gordon County)

Mailing Address: 187 Gordon Street
Fairmount, Georgia 30139 (Gordon County)

**Parent/Holding
Company:** J. M. Huber

Facility AIRS Number: 04-13-129-00028

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Updating Monitoring Requirements of the permit by replacing Conditions 5.2.1, 5.2.2, 5.2.3 and 5.2.4 with new monitoring conditions. Authorizing Off-Permit changes requested in Application Nos. 15699 and 15537.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 3295-129-0028-V-04-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit no. 3295-129-0028-V-04-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application Nos. TV-15821, TV-15699 and TV-15537 dated November 5, October 5, and July 29, 2004 and letter dated October 4, 2004; any other applications upon which this Permit Amendment or Permit No. 3295-129-0028-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 7 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 3295-129-0028-V-04-0.

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Permit is modified by replacing Monitoring Requirements of the existing permit with new conditions. The following Off-Permit changes are authorized by issuing this modification:

1. Relocation of a vacuum filter receiver and installation of a centrifugal sifter.
2. Replacing the existing Flash Dryer with a unit of the same capacity.
3. Replace the existing auger packer and an existing impeller packer with two new auger packers.
4. Temporary portable screening plant with a 40 hp diesel generator.
5. Install 8 small (10 hp) blowers to supply 15 psig fluidization air to the plant air packers.
6. Removal of air pads and installation of vibratory bin bottom on Silo 2.
7. Install 2 additional air packers at the Micral Silo 11.
8. Addition of a new auger packer below silo 14.
9. Dry waste slurry material as generated by the ATH process and Magnesium Hydroxide process.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Plant 1 – Unloading and Storage					
SP10	Crude Unload System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH13	Baghouse
SP09	Crude Silos	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH12	Baghouse
SP06	Roller Mill Surge Tanks	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH09	Baghouse
Plant 1 – Mill System					
SP01	Plant 1 Roller Mill 8 mm BTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.2, 3.4.1, 3.4.2, 3.4.4 3.4.5, 5.2.1, 5.2.2, 5.2.3 5.2.4	BH01 BH02	Baghouse
SP02	Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH03 BH04 BH05	Baghouse
Plant 1 – Finished Product					
SP07	“C” Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH10	Baghouse
SP08	“F” Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH11	Baghouse
SP03	Bulk Silo 1 & 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH06	Baghouse
SP04	Bulk Silo 3 & 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH07	Baghouse
SP23	Silo 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH40 VR1	Baghouse Vacuum Receiver
SP24	Silo 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH41 VR1	Baghouse Vacuum Receiver
SP05	East & West Silos	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH08	Baghouse
SP46	Packing Silo 18	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH61	Baghouse
SP47	Packing Silo 19	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH62	Baghouse
SP48	Super Sacker Bagger Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH63	Baghouse
SP49	Super Sacker Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH64	Baghouse
SP50	Blend System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 5.2.1, 5.2.2 5.2.3	BH114 BH115	Baghouse
SP32	Azo #1 Filter/Receiver	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	VR09	Vacuum Receiver
Plant 2 – Unloading and Loading Operations					
SP34	Railcar Unloading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH50	Baghouse
SP33	South Railcar Loading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH49	Baghouse
SP44	North Railcar Loading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH59	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
SP51	Blend System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 5.2.1, 5.2.2 5.2.3	BH42-48 VR2-8	Baghouse Vacuum Receiver
Plant 2 – Filter/Receiver					
SP37	Azo #2 Filter/Receiver	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	VR10	Vacuum Receiver
Plant 2 – No. 1 Mill System					
SP11	“A” Silo - Crude Storage	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH14	Baghouse
SP12	Ultra fine Mill 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH15 BH16	Baghouse
SP13	Mill 1 System Fan 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH17 BH18 BH19	Baghouse
SP14	Mill 1 System Fan 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH20 BH21 BH22	Baghouse
Plant 2 – No. 2 Mill System					
SP15	“B” Silo - Crude Storage	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH23	Baghouse
SP16	Ultra fine Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH24 BH25	Baghouse
SP17	Mill 2 System Fan 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH26 BH27 BH28	Baghouse
SP18	Mill 2 System Fan 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH29 BH30 BH31	Baghouse
Plant 2 – No. 3 Mill System					
SP19	“C” Silo - Crude Storage	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH32	Baghouse
SP20	Ultra fine Mill 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH33	Baghouse
SP21	Mill 3 System Fan 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH34 BH35 BH36	Baghouse
SP22	Mill 3 System Fan 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH37 BH38 BH39	Baghouse
Plant 2 – Finished Products					
SP25	Silo 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH42 VR2	Baghouse Vacuum Receiver
SP26	Silo 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH43 VR3	Baghouse Vacuum Receiver
SP27	Silo 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH44 VR4	Baghouse Vacuum Receiver
SP28	Silo 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH45 VR5	Baghouse Vacuum Receiver
SP29	Silo 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.2, 3.4.1, 3.4.3	BH46 VR6	Baghouse Vacuum Receiver
SP30	Silo 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH47 VR7	Baghouse Vacuum Receiver
SP31	Silo 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH48 VR8	Baghouse Vacuum Receiver
Plant 3					
APC60	Plant 3 boiler rated at 2.1 MMBTU/hr	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.4.2, 3.4.4, 3.4.5	None	N/A
SP35	500 lb Batch Blender	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH51	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
SP36	3,000 lb Batch Blender	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1, 5.2.2, 5.2.3	BH52	Baghouse
SP42	Batch Blend Bag Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH57 VR13	Baghouse Vacuum Receiver
SP38	Micral Silo 11	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH53	Baghouse
SP39	Micral Dryer rated at 9 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.4.2, 3.4.4, 3.4.5 5.2.1 5.2.2, 5.2.3, 5.2.4	BH54	Baghouse
SP40	Micral Deagglomerating Unit	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH55 VR12	Baghouse Vacuum Receiver
SP41	Micral Silo 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH56 VR11	Baghouse Vacuum Receiver
SP43	Bag Dump Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH58	Baghouse
SP45	Silo 20	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH60	Baghouse
Plant 4 – Wet Ground Calcium Carbonate					
SP100	Silo 14	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH100	Baghouse
SP101	Co-product Dryer rated at 6 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.4.2, 3.4.4, 3.4.5 5.2.1 5.2.2, 5.2.3, 5.2.4	BH101	Baghouse
SP102	Silo 15	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH102	Baghouse
SP103	Flash Dryer rated at 9 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.4.2, 3.4.4, 3.4.5 5.2.1 5.2.2, 5.2.3, 5.2.4	BH103 BH104	Baghouse
SP104	Deagglomerating Unit 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH105	Baghouse
SP105	Silo 16 Finished Product Bin Vent	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH106	Baghouse
SP106	Silo 17 Finished Product Bin Vent	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH107	Baghouse
SP107	Bagging Hopper Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH108	Baghouse
SP108	Recycle Hopper Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH109	Baghouse
SP109	Process Blower	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	VR101-105	Vacuum Receiver
SP110	Flash Dryer rated at 9 MMBTU/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.1, 3.4.2, 3.4.4, 3.4.5 5.2.1 5.2.2 5.2.3, 5.2.4	BH110	Baghouse
SP111	Deagglomerating Unit 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3, 5.2.1 5.2.2, 5.2.3	BH111	Baghouse
SP112	Silo 16 Finished Product Loading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH112 VR106, 107	Baghouse Vacuum Receiver
SP113	Silo 17 Finished Product Loading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.4.1, 3.4.3	BH113 VR108, 109	Baghouse Vacuum Receiver

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1]
- a. Temperature for baghouses identified by Condition 5.2.4. The temperature shall be monitored continuously and the data shall be recorded according to Condition 5.2.4.
 - b. Pressure drop for baghouses identified by Condition 5.2.2. The pressure drop shall be monitored and data recorded as specified in Conditions 5.2.2 and 5.2.3.
- 5.2.2 The Permittee shall perform a check of visible emissions from all baghouses (including process baghouses) controlling emissions from sources listed in Section 3.1 of this permit, and from sources added or replaced in accordance with this permit and Rule 391-3-1-.03. Baghouses controlling emission from silos with dedicated bin vents, wet screening operations, bucket elevators, screw conveyors, bagging operations, pneumatic conveyors and vacuum receivers are exempt from this condition. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The check shall be conducted at least once for each day or portion of each day of operation using procedures a through d below except when scheduling, atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b or c of this condition.
 - b. For each source determined to be emitting visible emissions, the Permittee shall determine whether the emissions equal or exceed the opacity action level using the procedure specified in paragraph d of this condition, except that the person performing the determination shall have received additional training acceptable to the Division to recognize the appropriate opacity level and the determination shall cover a period of three minutes. The opacity action level for all baghouses that have an NSPS type limit (0.02 grains/dscf or 0.04 grains/dscf) is 5 percent, and for all other baghouses is 10 percent. The results shall be recorded in the daily (VE) log. For sources that exhibit visible emissions of greater than or equal to the opacity action level, the Permittee shall comply with paragraph c of this condition.
 - c. For each source that requires action in accordance with paragraphs a or b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the

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cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.

- d. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

5.2.3 Within 60 days of the issuance of this permit, the Permittee shall develop and implement a Preventive Maintenance Program for the baghouses specified in condition 5.2.2 to assure that the provisions of condition 8.17.1 are met. The program shall be subject to review and, if necessary to assure compliance, modification by the Division and shall include the pressure drop ranges that indicate proper operation for each baghouse. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Record the pressure drop across each baghouse and ensure that it is within the appropriate range.
- b. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
- c. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.
- d. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.
- e. Check dust collector hoppers and conveying systems for proper operation.

5.2.4 The Permittee shall install continuous temperature monitors on the inlet of baghouses BH01, BH02, BH110, BH103, BH104, BH101, BH54 and other baghouses that receive gases from sources that dry or calcine and record the time and date of each incident when the temperature exceeds the filter bag design temperature. In lieu of monitoring temperatures baghouse inlets, the Permittee may monitor surrogate temperatures (e.g., clay temperature or calciner outlet temperature). For each baghouse monitored by a surrogate temperature, the Permittee shall determine the equivalent filter bag design temperature and record each incident when the surrogate temperature exceeds the equivalent filter bag design temperature. The Permittee shall record the filter bag design temperature or the equivalent filter bag design temperature for each baghouse listed. Such records and any supporting calculations shall be made available for inspection.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

PART 8.0 GENERAL PROVISIONS

8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[391-3-1-.02(3)(a)]