

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

City: Fairmount

County: Gordon

AIRS #: 04-13-129-00028

Application #: 15821, 15699, 15537

Date SIP Application Received: November 8, October 13, and August 3, 2004

Date Title V Application Received: November 8, October 13, and August 3, 2004

Permit No: 3295-129-0028-V-04-2

Program	Review Engineers	Review Managers
SSPP	Hamid Yavari	Richard McDonald
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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
3295-129-0028-V-04-0	October 21, 2003	√	
3295-129-0028-V-04-1	July 22, 2004		√

Table 2: Comments on Specific Permits

Permit Number	Comments
3295-129-0028-V-04-0	Comments received from the facility concerning (1) incorporating MACT and PSD avoidance limit into the permit and (2) requested exemption of some process related control devices from monitoring requirements of Section 5.2.

B. Regulatory Status

1. PSD/NSR/RACT

J. M. Huber – Fairmount (hereinafter facility) is located in an attainment area. It is a synthetic minor source under PSD because emissions of volatile organic compounds (VOC), hazardous air pollutants (HAPs), and particulate matter (PM) are limited below 250, 10/25, and 250 tpy, respectively.

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	√	√		
PM ₁₀	√	√		
SO ₂	√			√
VOC	√	√		
NO _x	√			√
CO	√			√
TRS	N/A			
H ₂ S	N/A			

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
Individual HAP	√			√
Total HAPs	N/A			

II. Proposed Modification

A. Description of Modification

The facility has requested an update to condition 5.2.1 of the existing permit. A pressure drop gauge will be required on only the baghouses requiring visible emission checks according to Condition 5.2.2. Pressure drop gauges and monitoring will not be required for small intermittently operated baghouses.

The following Off-Permit changes requested by the facility are now being incorporated into this permit:

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.

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	0.0003	0.0003
PM ₁₀	Yes		
SO ₂	No		
VOC	No		
NO _x	No		
CO	No		

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
TRS	N/A		
H ₂ S	N/A		
Individual HAP	No		
Total HAPs	No		

C. PSD/NSR Applicability

The potential PM/PM10 emissions from changes made to the original title V permit were estimated as 0.0003 tons/yr. The potential PM emission rate after the modification from the entire facility is below 250 tpy, so that the facility will remain a synthetic minor source under PSD after the modification.

III. Facility Wide Requirements

A. Emission and Operating Caps

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

None applicable.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

Several mineral processing operations are performed in the production of Aluminum Trihydrate, Magnesium Hydroxide and Calcium Carbonate products at this plant, including: unloading, material transfer, storage, wet and dry milling, blending, drying, bagging and bulk truck or railcar loading.

B. Equipment List for the Process

Table 3.1 has been updated. The modifications resulted in changing the requirement of the equipment permitted under permit Nos. 3295-129-0028-V-04-0 and 3295-129-0028-V-04-1. Condition 5.2.1 has been removed from sources that are exempt from the daily visible monitoring requirements specified under Condition 5.2.2.

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

TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
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
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

TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
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
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

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
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.

C. Equipment & Rule Applicability

- Emission and Operating Caps

No existing emission and operating cap for any existing equipment in this section are changed.

- Applicable Rules and Regulations -

Rules and Regulations Assessment: There are no new applicable rules and regulations. Installation of the new equipment will not trigger NSPS OOO or NSPS UUU because alumina trihydrate (ATH) does not appear on the NSPS OOO and NSPS UUU applicability and designation list. Since the facility is not involved in the production of metallic mineral concentrates from ore, NSPS LL does not apply to this facility.

Emission and Operating Standards: The existing permit contains all applicable emission and operating standard.

D. Compliance Status

Facility was issued a notice of violation and was cited for not complying with condition 5.2.1 and 5.2.3(a). These conditions require each baghouse pressure drop reading be recorded in a log. The facility was also in violation of condition 8.14.1. The annual certification submitted to EPD should have reported the deviations of condition 5.2.3(a).

The facility believes that the intent of Condition 5.2.1 is for pressure drop meters to be installed, calibrated and maintained on each baghouse subject to the daily visible monitoring requirements specified under Condition 5.2.2 and requested a clarification to Condition 5.2.1 be made to resolve this noncompliance issue.

EPD is modifying these conditions by replacing Monitoring Requirements of the existing permit with new conditions.

E. Operational Flexibility

None applicable

F. Permit Conditions

Conditions 5.2.1-5.2.4 are replaced with new conditions.

New template condition has been added to this permit modification for **Use of Any Credible Evidence or Information**. This addition has been established as Condition 8.26.1.

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

No testing is required

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

Monitoring requirements have been changed. Conditions 5.2.1, 5.2.2, 5.2.3 and 5.2.4 are baghouse monitoring requirements that apply to baghouses that control PM emissions. The monitoring tracks proper operation and maintenances of baghouses, which is accomplished by performing daily visible emission checks and weekly maintenances checks.

Condition 5.2.1 requires the installation, calibration, operation and maintenance of a pressure drop indicator for baghouses identify by Condition 5.2.2 and temperature monitor for baghouses identified by Condition 5.2.4.

VI. Other Record Keeping and Reporting Requirements

No changes have been made to the Record Keeping and Reporting Requirements.

VII. Specific Requirements

A. Operational Flexibility

This amendment does not address or alter any operational flexibility.

B. Alternative Requirements

This amendment does not address or alter any alternative requirements.

C. Insignificant Activities

Not applicable.

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Facility was issued a notice of violation and was cited for not complying with condition 5.2.1 and 5.2.3(a). These conditions require each baghouse pressure drop reading be recorded in a log. The facility was also in violation of condition 8.14.1. The annual certification submitted to EPD should have reported the deviations of condition 5.2.

By replacing the Monitoring Requirements conditions (conditions 5.2.1-5.2.4), which is consistent with other facilities within the non-metallic mineral processing industry, the non-compliance issue will be resolved.

G. Emissions Trading

This amendment does not address or alter any emissions trading.

H. Acid Rain Requirements

This amendment does not address or alter any acid rain requirements.

I. Prevention of Accidental Releases

This amendment does not address or alter any prevention of accidental release equipment.

J. Stratospheric Ozone Protection Requirements

This amendment does not address or alter any stratospheric ozone protection requirements.

K. Pollution Prevention

This amendment does not address or alter any pollution prevention.

L. Specific Conditions

This amendment adds Condition 4.2.3 for test and Condition 8.26.1 for **Use of Any Credible Evidence or Information**, which is a new template condition.

Addendum to Narrative

The 30-day public review started on October 5, 2005 and ended on November 4, 2005. The Division did not receive comments.