

Facility Name: Cargill’s Gainesville Vegetable Oil Mill & Refinery

City: Gainesville

County: Hall

AIRS #: 04-13-139-00002

Application #: 16739

Date SIP Application Received: May 23, 2006

Date Title V Application Received: NA

Permit No: 2075-139-0002-V-01-3

Program	Review Engineers	Review Managers
SSPP	Heather Abrams	Jac Capp
SSCP	NA	NA
ISMP	NA	NA
TOXICS	NA	NA

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft 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 comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2075-139-0002-V-01-0	April 30, 2002	X	
2075-139-0002-V-01-1	April 25, 2003	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2075-139-0002-V-01-0	Initial Title V
2075-139-0002-V-01-1	Incorporation of 40 CFR 63 Subpart GGGG and Georgia Rules (tt) and (yy)

B. Regulatory Status

1. PSD/NSR/RACT

The facility is a major source under PSD for NO_x, VOC, SO₂ and PM-10. Appropriate conditions are contained in the permit for these pollutants.

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	X	X		
PM ₁₀	X	X		
SO ₂	X	X		
VOC	X	X		
NO _x	X	X		
CO	X	X		
TRS	NA	NA		
H ₂ S	NA	NA		
Individual HAP	X	X		
Total HAPs	X	X		

II. Proposed Modification

A. Description of Modification

This modification is in response to a petition filed on October 7, 2003 by the Georgia Center for Law in the Public Interest on behalf of Sierra Club, Georgia Forestwatch and Newtown Florist Club (“Petitioners”) with US EPA, requesting EPA to object to Georgia Air Quality Permit Number 2075-139-0002-V-01-1. Specifically, this permit amendment will address Condition 2.2.5.

B. Emissions Change

There are no emission changes associated with this modification.

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	Y	0	0
PM ₁₀	Y	0	0
SO ₂	Y	0	0
VOC	Y	0	0
NO _x	Y	0	0
CO	Y	0	0
TRS	NA		
H ₂ S	NA		
Individual HAP	Y	0	0
Total HAPs	Y	0	0

C. PSD/NSR Applicability

Not Applicable

III. Facility Wide Requirements

A. Emission and Operating Caps:

Not Applicable

B. Applicable Rules and Regulations

Not Applicable

C. Compliance Status

The facility is in compliance with its current permit.

D. Operational Flexibility

Not Applicable

E. Permit Conditions

Not Applicable

IV. Regulated Equipment Requirements

A. Brief Process Description

There are no changes in operation as a result of this amendment. Please refer to the narrative for Georgia Air Quality Permit Number 2075-139-0002-V-01-0 for a detailed process description.

B. Equipment List for the Process

There are no equipment changes as a result of this amendment. Please refer to the narrative for Georgia Air Quality Permit Number 2075-139-0002-V-01-0 for a detailed equipment list.

C. Equipment & Rule Applicability

There are no changes in equipment or rule applicability due to this amendment.

D. Compliance Status

The facility is in compliance with its current permit.

E. Operational Flexibility

Not Applicable

F. Permit Conditions

Condition 2.25 has been modified to specifically incorporate the compliance plan required by 40 CFR 63 Subpart GGGG by reference. The plan was required to be developed and implemented by April 12, 2004. The facility met this requirement; however, Georgia EPD did not appropriately incorporate the plan as determined by EPA's amended objection dated October 19, 2004.

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

- A. Individual Equipment: Not Applicable
- B. Equipment Groups (all subject to the same test requirements): Not Applicable

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

- A. Individual Equipment: Not Applicable
- B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable

VII. Other Record Keeping and Reporting Requirements

Not Applicable

VIII. Specific Requirements

- A. Operational Flexibility
Not Applicable
- B. Alternative Requirements
Not Applicable
- C. Insignificant Activities
Not Applicable
- 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

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Not Applicable

Addendum to Narrative

The 30-day public review started on June 23, 2006 and ended on July 24, 2006. However, the Georgia Center for Law in the Public Interest was unable to locate a relevant document (March 29, 2006 letter from Ron Methier to Alan Farmer and attachments) until July 21, 2006. Therefore, the comment period was extended until August 7, 2006. The Georgia Center agreed to this extension. Comments were received by the Division from the Georgia Center for Law in the Public Interest dated August 3, 2006. A letter from US EPA dated July 19, 2006 was also received stating that, "EPD has complied with EPA's October 19, 2004, Amended Order Partially Granting and Partially Denying Petition for Objection to Permit Amendment for Cargill, Inc."

Georgia Center Comment #1

The Georgia Center commented the NO_x limit for Cargill's coal-fired boiler B001 should be lower than Cargill's emission limit of 0.41 lb/mmBtu, and the control technology should be selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR). The Georgia Center went on to refer back to their previous comments on this issue in the Petition filed with EPA on October 2, 2003 and all attachments, including the Powers Engineering Report and original comments filed on October 3, 2003.

EPD Response #1

EPA's October 19, 2004 Amended Order did not, in any way, direct Georgia EPD to lower that NO_x limit on the coal-fired boiler. It merely stated that the permit record had insufficient information on how EPD arrived at its decision on the NO_x limit. In a memo dated March 27, 2006 from Heather Abrams to Ron Methier and in a letter dated March 29, 2006 from Ron Methier to Alan Farmer of US EPA, EPD provided additional explanation for that decision. US EPA has specifically stated (July 19, 2006 letter described above) that this explanation is sufficient to comply with the Amended Order. Therefore no changes are made to the permit based on this comment.

Georgia Center Comment #2

This comment was not in regard to the permit itself, but rather on the length and nature of the process to resolve this situation. The Georgia Center commented that this process has taken four years and has yet to be resolved. They commented that EPD did not do a good job at communicating with them regarding this process.

EPD Response #2

EPD shares the Georgia Centers concerns regarding the length of the process. Unfortunately, as the Georgia Center is well aware, Title V Petitions to US EPA typically take a very long time to resolve. However, EPD does not agree with the Georgia Center that this situation has yet to be resolved. With the issuance of this permit and with US EPA agreeing that the Amended Order has been complied with, EPD considers this issue resolved.

Regarding the issue of communication, it is EPD's goal to have open communication with the public such that they have access to the information they need regarding the environmental issues we handle.