

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Facility Name: **J. M. Huber Corporation – Wrens Plant**
City: Wrens
County: Jefferson
AIRS #: 04-13-163-00016

Application #: TV-12837
Date Application Received: February 6, 2001
Date Application Deemed Administratively Complete: February 27, 2001
Date of Draft Permit: May 24, 2001
Permit No: 1455-163-0016-V-01-1

Program	Review Engineers	Review Managers
SSPP/ASU	Jing Wang	James Current
SSCP/ASU	Richard McDonald	Lou Musgrove
ISMP	James Kelly	Larry Webber
Toxics	--	--

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached 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 is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1. 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. The purpose of this narrative is to provide information only. Any revisions made to the permit 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

The Facility Description may be presented in outline or narrative form. It must contain the information contained in each of the following subsections, preferably in a similar order.

A. 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
1455-163-0016-V-01-0	August 30, 1999	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
1455-163-0016-V-01-0	It was issued for the operation of Kaolin processing facility.

B. Regulatory Status

1. PSD/NSR

The facility is a minor source under PSD. Since the facility is not located in the Atlanta ozone non-attainment area, the facility is not a source subject to the non-attainment area NSR.

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	--			
H ₂ S	--			
Individual HAP	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

The application results in a major modification to increase the usage of No. 2 fuel oil and remove the No. 2 fuel oil usage cap because of nature gas price rising.

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	✓	≤ 3.3	3.3
PM ₁₀	✓	≤ 3.3	3.3
SO ₂	✓	>5	>5
VOC	✓	<5	<5
NO _x	✓	>5	0
CO	✓	<5	<5
TRS	---		
H ₂ S	---		
Individual HAP	✓	0	0
Total HAPs	✓	0	0

C. PSD/NSR Applicability

The modification does not change the facilities classification as a major source for particulate matter (PM), particulate matter less than 10 microns (PM₁₀), sulfur dioxide (SO₂) and Nitrogen Oxides (NO_x). The original facility is not a PSD major source nor does the major modification trigger PSD (attainment areas) or Non-attainment NSR (non-attainment area).

III. Facility Wide Requirements

A. Emission and Operating Caps

In order for the facility to avoid become a major PSD source, Conditions 2.1.1, 2.1.2 and 2.1.3 state that the facility shall not equal or exceed of 250 tons per year of SO₂, NO_x and PM emissions, respectively, during any 12 continuous months period.

B. Applicable Rules and Regulations

None.

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

C. Compliance Status

All information available to the Division as of this date indicates that the facility is currently being operated in compliance with all applicable facility wide requirements.

D. Operational Flexibility

None.

E. Permit Conditions

None.

IV. Regulated Equipment Requirements

A. Brief Process Description

The facility manufactures kaolin product.

B. Equipment List for the Process

Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No(s).	Description	Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No.(s)
Fuel Burning Equipment - Plant					
W-430	Structured Pigment Boiler	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(d)	None	N/A
S-201	Mine Boiler	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(d)	None	N/A
W-500	Evaporator Boiler	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(d)	None	N/A
W-1	#1 Generator	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
W-2	#2 Generator	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
W-3	#3 Generator	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
W-4	300 kW Generator	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No(s).	Description	Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No.(s)
W-67	#2 S.D. Turbine Generator	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
Fuel Burning Equipment - Warren County (Degritting Plant)					
S-101	900 kW Generator @ Mine	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
S-103	1,000 kW Generator @ Mine	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
AST-1	Central Diesel Storage Tank			None	N/A
Spray Dryers					
W-50	#1 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)2	Baghouse	W-51
W-60	#2 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse Scrubber	W-61 W-65
W-370	#3 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.4.3, 3.4.4, 3.4.5, 3.5.5, 3.5.7,3.5.8	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS UUU	Baghouse Baghouse Scrubber	W-371 W-372 W-377
Soda Ash Area					
W-10	Soda Ash Bin	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-11
Makedown Area					
W-80	#1 Makedown Bin	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-81
W-90	#2 Makedown Bin	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-91
W-100	#3 Makedown Bin	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-101
Silo Area					
W-200	#1 Spray Dryer Bucket Elevator	3.4.2 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-201
W-54	#1 Spray Dryer Bucket Elevator (Belt Conveyor)	3.2.1 3.4.2 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)2	Baghouse	W-201

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Emission Units				Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No(s).	Description			Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No(s)
W-210	#2	Spray Dryer	Bucket Elevator	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-211
W-64	#2	Spray Dryer	Bucket Elevator (Belt Conveyor)	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-211
W-220	#3	Spray Dryer	Bucket Elevator	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-221
W-375	#3	Spray Dryer	Bucket Elevator (Belt Conveyor)	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-221
W-230	#1	Pneumatic System		3.2.3 3.4.2 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)2	Baghouse	W-231
W-235	#2	Pneumatic System		3.2.3 3.4.2 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)2	Baghouse	W-236
W-240	#3	Pneumatic System		3.2.3 3.4.2 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)2	Baghouse	W-241
W-245	#4	Pneumatic System		3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-246
W-251	Railcar Elevator	Unloading System	Bucket	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-252
W-260	#21	Silo		3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-261
W-270	#22	Silo		3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-271
W-280	#23	Silo		3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-281
W-290	#24	Silo		3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-291
W-300	#25	Silo		3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-301
W-310	#26	Silo		3.2.3, 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-311

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

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ID No(s).	Description	Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No(s)
W-320	#31 Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-321
W-330	#32 Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-331
W-340	#33 Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-341
W-350	#34 Silo	3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-351
W-360	#35 Silo	3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-361
W-263	#21 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-273	#22 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-283	#23 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-293	#24 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-303	#25 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-313	#26 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-323	#31 Railcar Loading Spout	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A
W-333	#32 Railcar Loading Spout	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A
W-343	#33 Railcar Loading Spout	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A
W-353	#34 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-363	#35 Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A
W-68	#2 Spray Dryer Railcar Loading Spout	3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	None	N/A

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No(s).	Description	Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No.(s)
W-376	#3 Spray Dryer Railcar Loading Spout	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A
Bagging Area					
W-21	One-ton Bagger Bin Bucket Elevator	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-22
W-40	One-ton Bagger Bin Bucket Elevator and Shifter	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-22
W-30	50 lb. Bagger	3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-32
W-31	50 lb. Bagger Bin	3.2.3 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	W-32
SAMS Silos					
W-400	#1 Structured Pigment Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-401
W-405	#2 Structured Pigment Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-406
W-410	#3 Structured Pigment Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-411
Polygloss Area					
W-460	Milled Product Feed Silo	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-461
W-451	#1 Milled Product Feed Hopper	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-465
W-453	#2 Milled Product Feed Hopper	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-465
W-464	#3 Milled Product Feed Hopper	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-465
W-450	#1 Milled Product Pulverizer	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-455

SIP MODIFICATION PERMIT AND TITLE V SIGNIFICANT MODIFICATION APPLICATION REVIEW

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ID No(s).	Description	Corresponding Permit Condition(s)	Applicable Requirement(s) / Standard(s)	Description	ID No(s)
W-452	#2 Milled Product Pulverizer	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-455
W-463	#3 Milled Product Pulverizer	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-455
W-454	Milled Product Bagger Feed Bins	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-455
W-468	Milled Product Bagger Feed Bins	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-455
W-457	Milled Product Baggers (50 lb.)	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-458
W-467	Milled Product Baggers (Super Sack)	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	W-458
Warren County (Degritting Plant)					
S-203	Meta Storage Bin (Mine Blunger Bldg.)	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1	Baghouse	S-204
S-206	Meta Storage Bin (Mine Blunger Bldg.)	3.2.1 3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	S-207
S-209	STPP Storage Bin (Mine Blunger Bldg.)	3.2.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	S-210
S-212	Soda Ash Storage Bin (Mine Blunger Bldg.)	3.2.1 3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	Baghouse	S-213
S-216	Belt Conveyor (for No. 4 Mine Blunger Line)	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A
S-218	Belt Conveyor (for No. 5 Mine Blunger Line)	3.3.1 3.4.1 3.4.3	391-3-1-.02(6)(b) 391-3-1-.02(2)(p)1 NSPS OOO	None	N/A

*APCD = Air Pollution Control Device
Generally Applicable Requirements listed in Section 8 of the Permit may apply to emission units listed above.

C. Equipment & Rule Applicability

Emission and Operating Caps -

Permit Condition 3.5.5 prohibits the Permittee from firing any fuel, which has sulfur content greater than 0.5 percent in weight, and it removes the No. 2 fuel oil usage limitation of 1,000,000 gallon per year in accordance with the Permittee's request.

Condition 3.5.7 requires the Permittee should use AP-42 NO_x emission factors listed in Table A, B and C (see section 6.2 of the Permit) before development of new NO_x emission factors.

In condition 3.5.8, the Permit requires that the Permittee shall limit its monthly emission limits for NO_x to average no more than 1/12th of 250 tons/year.

D. Compliance Status

Not applicable.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

Permit Condition 3.5.5 prohibits the Permittee from firing any fuel, which has sulfur content greater than 0.5 percent in weight.

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

A. General Testing Requirements

Permit Condition 4.1.3 shows useful test methods for measuring emissions.

B. Specific Testing Requirements

In Condition 4.2.4, this Permit requires the Permittee to conduct the NO_x emission factors tests on all emission units listed in Table A, B and C (see Section 6.2 of the Permit) within 90 day after effective of the TV Permit Amendment, and to report all NO_x emission factors data to the Division within 45 days after completion of the tests. This condition also requires the facility to include a safety factor in determining their new emission factors for NO_x.

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

A. General Monitoring Requirements

Not applicable.

B. Specific Monitoring Requirements

Condition 5.2.7 shall only apply should the Permittee choose to use Baghosue W-371 and W-372 to control PM emissions from No. 3 spray Dryer (Source Code W-370). It states the report of excess emissions, exceedances and excursions.

Condition 5.2.9 shall only apply should the Permittee choose to use Packed Tower Scrubber W-377 in conjunction with Baghouse W-371 and Baghouse W-372 to control particulate matter emissions from No. 3 Spray Dryer W-370. It requires the Permittee to report the excess emissions, exceedances and excursions.

Conditions of 5.2.11, 5.2.12 and 5.2.13 require the Permittee shall install, calibrate, maintain and operate continuous monitoring systems to record Nature gas and fuel usage for all units, and operating hours of generators.

Condition 5.2.14 requires the Permittee shall follow the protocol to monitor Nitrogen Oxides emissions from the units listed in Table A, B and C (Section 6.2 of the Permit).

In condition 5.3.1, it requires that the Permittee shall submit semiannual report.

Condition 5.3.2 requires the Permittee shall have the records of the supplier certifications of sulfur content from all fuel oil received during the semiannual period to represent all fuel oil combusted.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

Not applicable.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.3 states that the Permittee shall maintain separate monthly usage report of each type of fuel, and keep the usage calculations as a part of the monthly report.

In condition 6.2.6, it requires that the Permittee shall calculate the monthly NO_x and SO₂ emission by using the proper equations and records, and report any monthly excess emission.

Condition 6.2.7 requires the Permittee shall calculate the 12-month rolling total of NO_x and SO₂ emission, and report any excess emission of 12-month rolling total.

Condition 6.2.9 determines the quantity of NO_x emissions from all No.2 fuel oil generators.

Condition 6.2.10 shows the equation to determine the quantity of NO_x emissions from turbine generator W-67.

Permit Condition 6.2.11 states how to calculate the monthly NO_x emissions from boilers and dryers.

Permit Condition 6.2.12 shows the equation to calculate the quantity of SO₂ emissions from all emission units listed in Table A, B and C.

VII. 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.

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.

Addendum to Narrative J. M. Huber – Wrens Plant, TV-12837**Comments**

1. The Facility wants to have “120 days” instead of “90 days” in the Condition 4.2.4: Within 120 (instead of 90) days of the effective date of this Permit, the Permittee shall conduct testing for Nitrogen Oxides (NO_x) emissions on all emissions units listed in Table A, B, and C (Section 6.2 of this Permit) for the purpose of establishing NO_x emissions factors for the units.

Division’s Response: Division agrees and change made.

2. The Facility wants to add the paragraph in the Condition 5.2.14. The paragraph is "If over a three (3) month consecutive period, all monthly measurements of NO_x and O₂ indicate compliance with the established emission factors (lb/mmbtu) as developed under Condition 4.2.4, the permittee may forgo monthly measurements for the subsequent three(3) months."

Division’s Response: For the better wording and limiting the confusion, the Division and the Facility agree to add new subcondition 5.2.14g, which is “Following two (2) consecutive monthly measurements determined to be less than the applicable NO_x emission factor for an emissions unit, the measurement may be conducted on the emissions unit at a frequency of one per calendar quarter (quarters ending March 31, June 30, September 30, and December 31). Following any quarterly measurement determined to be greater than the applicable NO_x Emission Factor for an emission unit, the Permittee shall make adjustments to the emission unit and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows that the monitoring NO_x emission factor is equal to or less than the applicable NO_x emission factor for the unit, at which time monthly measurements may be resumed. Measurements shall be conducted each month until two (2) consecutive monthly measurements are determined to be less than the applicable NO_x emission factor for the emission unit at which time measurements at a frequency of one per calendar quarter may be conducted.” to Condition 5.2.14.

Additionally the following changes have been made:

- A. The description of the modification on the permit cover page has been changed to more accurately reflect the amendment.
- B. During course of the review it was discovered that the one million gallon limit on No. 2 fuel oil was not sufficient to limit the potential NO_x emissions below the PSD major source threshold. This is because the NO_x emission factors for internal combustion engines are significantly higher than the NO_x emission factors for boilers (which were previously used in estimating the facility’s NO_x emissions). However, the limits and requirements of this amendment will limit the potential NO_x emission below 250 tons per year.
- C. Proposed condition 2.1.3, which limited facility-wide PM emissions to below 250 tons per year, was determined not to be practically enforceable. Instead, condition 3.2.1 has been added to reduce the allowable particulate matter emissions from Spray Dryers 1 and 2, and condition 3.2.4 and 3.2.5 have been added to limit the railcar loading operation. The revised limit in Condition 3.2.1 is the same as is required for NSPS dryers. These reduced limits result in the total potential PM limits for the facility to be less than 250 tons per year. Condition 5.2.2.b. was amended to set the trigger level

for the baghouses controlling Spray Dryers 1 and 2 to the same as for NSPS baghouses. Condition 4.2.5 has been added to require an initial compliance test to demonstrate compliance with the lower limits. Condition 5.2.7.b.v and Condition 5.2.9.b.iv were amended for the purpose of report required in Condition 5.3.1 for the railcar loading operation. Condition 6.2.12 was amended to require that the Permittee should record 12 month-rolling total and report any incident that 12 month-rolling total is more than 500,000 dry tons from the railcar loading operation.

- D. The added Condition 3.4.7 should have been in the original Title V Permit, since the fuel-burning emission units are subject to Rule (g). Because of this addition, the Table 3.1 has also been revised.
- E. The added Condition 4.2.6 states that the Permittee may reestablish new applicable NO_x emission factors through conducting NO_x emission testing and/or selection of a different safety factor of at least 15%.
- F. A revised emissions unit table (condition 3.1) was added to include the new conditions and to correct errors that currently exist in the permit conditions column of the table. In the original TV permit, some stack limitations were not listed in the Table 3.1, but in the calculation of Potential to Emit of Particular Matter, the facility has already voluntarily taken these stack limitations. So in the revised Table 3.1, all stack limitations for associated emission units have been put in the column of Corresponding Permit Conditions. Please see the attached document from the consultant of the Facility dated May 7 2002. Facility –wide potential to Emit of Particular Matter is 211.18 tons per year. Note that the submitted calculation shows a bypass item for the No. 2 spray dryer as part of the potential to emit calculation. But the bypass mode of operation is not allowed under the general provisions of the rules.
- G. Proposed condition 6.2.8 was removed because it was redundant with proposed condition 6.2.6.
- H. Proposed conditions 6.2.8, 6.2.9, 6.2.10 and 6.2.11 were modified to allow for new fuel-burning units that may be added in the future and tried to keep these equations consistent.