

Facility Name: Huber Engineered Materials  
 City: Howard Mill Road  
 County: Jefferson  
 AIRS #: 04-13-163-00016

Application #: TV-15080, TV-14388, & TV-14179  
 Date Application Received: February 27, 2004, March 26, 2003, & December 19, 2002  
 Permit No: 3295-163-0016-V-02-0

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## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. 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, and (3) Title V of the Clean Air Act Amendments of 1990. 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Huber Engineered Materials** 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, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. 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**

## A. Facility Identification

1. Facility Name: Huber Engineered Materials

2. Parent/Holding Company Name

J. M. Huber Corporation

3. Previous and/or Other Name(s)

J. M. Huber owns **two** facilities in Wrens, Georgia. J. M. Huber owns this facility and an additional facility acquired originally from ECC International and now designated J. M. Huber - Wrens Calcine Plant. (See Title V Permit No. 3295-163-0026-V-01-0 issued on April 30, 2001 for details).

The facility identified in **this** application was previously identified as J. M. Huber Corporation - Wrens Plant. This facility was originally permitted on August 30, 1999, (No. 1455-163-0016-V-01-0). Based on application No. 15080, J. M. Huber would like this facility to be identified as **Huber Engineered Materials**.

4. Facility Location

2069 Howard Mill Road  
Wrens, Georgia 30833

5. Attainment or Non-attainment Area Location

The facility is not located inside the Atlanta Non-attainment Area.

6. Class I Area Impacts

The facility is not located within 200 km of a Class I area.

## B. Site Determination

J. M. Huber owns **two** facilities in Wrens, Georgia. J. M. Huber owns this facility and an additional facility acquired originally from ECC International and now designated J. M. Huber - Wrens Calcine Plant. (See Title V Permit No. 3295-163-0026-V-01-0 issued on April 30, 2001 for details).

The plants both process nonmetallic minerals and are considered to have the same first two digits of the SIC for air quality purposes based on the type of air emitting equipment regulated by Title V. Both plants are owned by J. M. Huber Corporation and are under common control. There is property, other than a road, that separates the two plants that is not owned by J. M. Huber Corporation. Hence, the two plants are not contiguous.

The calcine plant was previously owned by ECC International and currently operates independent of this plant with regards to personnel and equipment. The facilities are located approximately three miles apart. Based on historical treatment, lack of interdependency, and distance, these two plants are not considered adjacent. Therefore, 2 permits will be issued.

### 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
1455-163-0016-V-01-2	06/05/2002	X	
1455-163-0016-V-01-1	05/23/2002	X	
1455-163-0016-V-01-0	08/30/1999	X	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
1455-163-0016-V-01-2	Addition of three turbines (T-1, T-2, and T-3) used to generate base-load electrical power for operations within the plant.
1455-163-0016-V-01-1	Removal of limit on No. 2 fuel oil usage, decreased particulate matter limit for #1 and #2 Spray Dryers, and addition of PSD major source avoidance caps for sulfur dioxide and nitrogen oxides and associated testing, monitoring, recordkeeping, and reporting requirements.
1455-163-0016-V-01-0	Original Part 70 Operating Permit

### D. Process Description

#### 1. SIC Codes(s)

Major - 3295

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.

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. Description of Product(s)

The facility processes kaolin.

#### 3. Overall Facility Process Description

Crude kaolin is made into clay slurry and pumped from the mine to the processing plant. After vacuum filtration, dry products are produced by spray drying and wet products are kept in slurry form as final product or blended with dry products in the makedown system. Dry clay can be stored in silos, packaged in 50 lb. or one-ton bags, loaded in railcars, or used in makedown.

### **Mine Operation**

Crude clay is treated by blungers, goes through degritting processes and is pumped to storage, trucked to customers, or pumped to the main processing plant. A boiler provides steam for the blunging process.

### **Main Plant Operation**

The clay slurry is pumped into large storage tanks until it is determined how the clay will be processed. Vacuum filters are used to reduce the moisture content of the clay. Soda Ash is added during the filtration process to disperse the clay and adjust the pH. After the vacuum filtration and bleaching processes, the clay slurry is separated by product grades and by the type of product desired: wet or dry.

### **Evaporator**

The evaporator is used to build solids content in slurry products. The wet products are kept in slurry form and shipped directly to customers, or are blended with other clay and/or chemicals to produce additional products.

### **Spray Dryers**

Clay is pumped from the wet filter cake storage tanks to the spray dryers, where atomizers disperse the slurry into a fine mist. The mist of clay is then discharged into a hot air stream. The spray dryers are equipped with natural gas/No. 2 Fuel Oil fired burners to generate the hot gases in the spray dryer chambers. Heat Exchangers with Wet Scrubber Systems are installed on Spray Dryers #2 and #3 to reclaim some of the energy used in the spray drying process. Once the moisture vaporizes, the dried clay falls to the bottom of the drying chamber and is collected by conveyor belts and transported to the storage silos. Exhaust gas from gas fired turbine driven electric generators may also be used to generate the hot gases in the spray dryer chambers.

### **Railcar Unloading**

Clay is also received by railcar from other plants. A Railcar Unloading System is in place to transfer dry clay from the railcars to storage silos. Clay is gravity fed from the railcar and transported to the silos.

### **Railcar Loading & Slurry Makedown**

From the storage silos, dry clay may be gravity fed into hopper cars or transported by pneumatic or mechanical conveyors to other areas of the plant. Clay from the Makedown Storage Bin is gravity fed to the slurry Makedown tanks where the clay is blended to satisfy customer requirements.

#### 4. Overall Process Flow Diagram

The process and flow diagrams are included in application.

## E. Regulatory Status

PSD/NSR - The facility is not subject to PSD/NSR review. The permit has limits to ensure the facility is not a major source as defined in the 40 CFR Part 52.21 *Prevention of Significant Deterioration* (PSD). Wrens is in attainment for all National Ambient Air Quality Standards (NAAQS). Therefore, non-attainment portion of New Source Review (NSR) contained in the 40 CFR Part 52 does not apply. The potential emissions have been calculated based on physical, operational, and permit limitations at this facility, and determined to be as follows:

Pollutant Potential Emissions (ton/yr)

Particulate Matter (PM)	174
Sulfur Dioxide (SO <sub>2</sub> )	<250
Nitrogen Oxide (NO <sub>x</sub> )	<250
Ozone – Volatile Organic Compounds (VOC)	93
Carbon Monoxide (CO)	214

TRS and H<sub>2</sub>S emissions are reported to be less than 100 tons per year. Single HAPs are shown to be less than 10 tons per year and combination of HAPs is shown to be less than 25 tons per year. Note that processing 25,000 tons per year of treated clay results in the potential emissions of 56.3 tons per year ethanol according to application 8832. Ethanol is a VOC, but not a HAP.

## 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 <sub>10</sub>	✓	✓		
SO <sub>2</sub>	✓	✓		
VOC	✓	✓		
NO <sub>x</sub>	✓	✓		
CO	✓	✓		
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

## 3. MACT Standards

The facility is not subject to any MACT standards.

## 4. Program Applicability

Program Code	Applicable (y/n)
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:

In order for the facility to avoid becoming a major PSD source, Conditions 2.1.1 and 2.1.2 state that the facility will not equal or exceed of 250 tons per year of SO<sub>2</sub> or NO<sub>x</sub>, emissions during any 12 continuous month's period.

Condition 2.1.3 limits the facility from emitting any single hazardous air pollutant in amounts equal to or exceeding 10 tons (or any lesser quantity for a single hazardous air pollutant that the U.S. EPA may establish by rule) during any 12 consecutive months, or any combination of such listed pollutants in amounts equal to or exceeding 25 tons during any 12 consecutive months. This condition is included to avoid the requirements of 40 CFR 63 Subpart A.

MACT Avoidance

## B. Applicable Rules and Regulations

None.

## C. Compliance Status

None.

## D. Operational Flexibility

None.

## E. Permit Conditions

None.

**III. Regulated Equipment Requirements****A. Brief Process Description**

The facility processes kaolin.

**B. Equipment List for the Process****3.1 Emission Units**

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)
<b>Fuel Burning Equipment – Plant</b>					
W-430	Structured Pigment Boiler	2.1.1, 2.1.2, 3.4.3, 3.4.4, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	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, 3.4.3, 3.4.4, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	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, 3.4.3, 3.4.4, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	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, 3.4.3, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	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, 3.4.2, 3.4.3, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 5.2.13, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	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, 3.4.2, 3.4.3, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 5.2.13, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A

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-4	300 kW Generator	2.1.1, 2.1.2, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
T-1	Turbine Generator No.1	2.1.1, 2.1.2, 3.4.2, 3.4.3, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
T-2	Turbine Generator No.2	2.1.1, 2.1.2, 3.4.2, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
T-3	Turbine Generator No. 3	2.1.1, 2.1.2, 3.4.2, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
<b>Fuel Burning Equipment – Warren County (Degritting Plant)</b>					
S-101	900 kW Generator @ Mine	2.1.1, 2.1.2, 3.4.2, 3.4.4, 3.4.5, 3.5.4, 3.5.5, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	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, 3.4.2, 3.4.5, 3.5.4, 3.5.5, 3.5.5, 4.2.4, 4.2.5, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 5.2.13, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A
AST-1	Central Diesel Storage Tank			None	N/A
<b>Spray Dryers</b>					
W-50	#1 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.2.1, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.5.1, 3.5.2, 3.2.6, 3.5.4, 3.5.5, 4.2.4, 4.2.5, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)	Baghouse	W-51

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-60	#2 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.2.1, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.5.1, 3.5.2, 3.2.6, 3.5.4, 3.5.5, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)	Baghouse Scrubber	W-61 W-65
W-370	#3 Spray Dryer	2.1.1, 2.1.2, 2.1.3, 3.2.2, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.5.1, 3.5.2, 3.2.6, 3.5.4, 3.5.5, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 5.2.1, 5.2.6, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.13, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.9, 6.2.10, 6.2.11, 6.2.13, 6.2.14, 6.2.15	391-3-1-.02(2)(g) 391-3-1-.02(2)(p) 40 CFR 60 Subpart UUU	Baghouse Baghouse Scrubber	W-371 W-372 W-377
<b>Soda Ash Area</b>					
W-10	Soda Ash Bin	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-11
<b>Makedown Area</b>					
W-80	#1 Makedown Bin	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-81
W-90	#2 Makedown Bin	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-91
W-100	#3 Makedown Bin	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-101
<b>Silo Area</b>					
W-200	#1 Spray Dryer Bucket Elevator	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-201
W-54	#1 Spray Dryer Bucket Elevator (Belt Conveyor)	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-201
W-210	#2 Spray Dryer Bucket Elevator	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-211
W-64	#2 Spray Dryer Bucket Elevator (Belt Conveyor)	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-211
W-220	#3 Spray Dryer Bucket Elevator	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-221
W-375	#3 Spray Dryer Bucket Elevator (Belt Conveyor)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-221
W-230	#1 Pneumatic System	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-231
W-235	#2 Pneumatic System	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-236

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-240	#3 Pneumatic System	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-241
W-245	#4 Pneumatic System	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-246
W-251	Railcar Unloading Bucket Elevator System	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-252
W-260	#21 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-261
W-270	#22 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-271
W-280	#23 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-281
W-290	#24 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-291
W-300	#25 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-301
W-310	#26 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-311
W-320	#31 Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-321
W-330	#32 Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-331
W-340	#33 Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-341
W-350	#34 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-351
W-360	#35 Silo	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-361
W-263	#21 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-273	#22 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-283	#23 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-293	#24 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A

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-303	#25 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-313	#26 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-323	#31 Railcar Loading Spout	3.2.4, 3.2.5, 3.3.1, 3.3.3, 3.4.1, 6.2.12	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) NSPS OOO	None	N/A
W-333	#32 Railcar Loading Spout	3.2.4, 3.2.5, 3.3.1, 3.3.3, 3.4.1, 6.2.12	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	None	N/A
W-343	#33 Railcar Loading Spout	3.2.4, 3.2.5, 3.3.1, 3.3.3, 3.4.1, 6.2.12	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	None	N/A
W-353	#34 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-363	#35 Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-68	#2 Spray Dryer Railcar Loading Spout	3.2.4, 3.2.5, 3.4.1, 3.4.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)	None	N/A
W-376	#3 Spray Dryer Railcar Loading Spout	3.2.4, 3.2.5, 3.3.1, 3.3.3, 3.4.1, 6.2.12	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	None	N/A
<b>Bagging Area</b>					
W-21	One-ton Bagger Bin Bucket Elevator	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-22
W-40	One-ton Bagger Bin Bucket Elevator and Shifter	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-22
W-30	50 lb. Bagger	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-32
W-31	50 lb. Bagger Bin	3.2.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	W-32
<b>SAMS Silos</b>					
W-400	#1 Structured Pigment Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-401

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-405	#2 Structured Pigment Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-406
W-410	#3 Structured Pigment Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-411
<b>Polygloss Area</b>					
W-460	Milled Product Feed Silo	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-461
W-451	#1 Milled Product Feed Hopper	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-465
W-453	#2 Milled Product Feed Hopper	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-465
W-464	#3 Milled Product Feed Hopper	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-465
W-450	#1 Milled Product Pulverizer	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-455
W-452	#2 Milled Product Pulverizer	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-455
W-463	#3 Milled Product Pulverizer	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-455
W-454	Milled Product Bagger Feed Bins	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-455
W-468	Milled Product Bagger Feed Bins	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.11, 6.1.4, 6.1.5, 6.1.6, 6.1.7	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-455
W-457	Milled Product Baggers (50 lb.)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-458
W-467	Milled Product Baggers (Super Sack)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	W-458

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)
<b>Warren County (Degritting Plant)</b>					
S-203	Meta Storage Bin (Mine Blunger Bldg.)	3.2.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)	Baghouse	S-204
S-206	Meta Storage Bin (Mine Blunger Bldg.)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.11	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	S-207
S-209	STPP Storage Bin (Mine Blunger Bldg.)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	S-210
S-212	Soda Ash Storage Bin (Mine Blunger Bldg.)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2	391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	Baghouse	S-213
S-216	Belt Conveyor (for No. 4 Mine Blunger Line)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2, 5.2.5	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	None	N/A
S-218	Belt Conveyor (for No. 5 Mine Blunger Line)	3.2.1, 3.3.1, 3.3.3, 3.4.1, 3.5.1, 3.5.2, 5.2.2, 5.2.5	391-3-1-.02(2)(n) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO	None	N/A

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 -

Condition 3.2.1 requires stack limit emissions as not to contain particulate matter in excess of 0.05 g/dscm (0.02 grains/dscf) from each source code identified in Table 3.1. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

Condition 3.2.2 requires stack limit emissions as not to contain particulate matter in excess of 0.06 g/dscm (0.025 grains/dscf) from each source code identified in Table 3.1. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

Condition 3.2.3 requires stack limit emissions as not to contain particulate matter in excess of 0.10 g/dscm (0.04 grains/dscf) from each source code identified in Table 3.1. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

Condition 3.2.4 requires particular matter emissions below 0.10 pounds per ton of dry product from each source code identified in Table 3.1. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

Condition 3.2.5 limits the railcar loading operation to not load more than 500,000 dry tons per 12 consecutive months. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

Condition 3.2.6 limits total production of Treated Water Wash Clay #1 from No.1 Spray Dryer (W-50), No. 2 Spray Dryer (W-60) and No. 3 Spray Dryer (W-370) not exceed 25,000 tons per 12 consecutive months. This condition is included to avoid PSD Major Source Status of 40 CFR 52.21.

### **Applicable Rules and Regulations –**

#### NSPS Applicability.

40 CFR, Part 60, Subpart OOO - "Standards of Performance for Nonmetallic Mineral Processing Plants" Huber Engineered Materials will comply with this provision for visible fugitive emissions from each of these source codes will not exhibit greater than 10 percent opacity. Stack emissions from each of these source codes will not contain particulate matter in excess of 0.05 g/dscm (0.02 grains/dscf) and exhibit greater than 7 percent opacity.

40 CFR, Part 60, Subpart UUU - "Standards of Performance for Calciners and Dryers in Mineral Industries" The #3 Spray Dryer is the only equipment part of the proposed change in method of operation that is subject to NSPS Subpart UUU. The limits include a 0.025 grains/dscf and 10% opacity limit for the #3 Spray Dryer controlled by baghouses W371 and W-372. The baghouses are a proven control technology capable of reducing emissions to compliant levels.

Georgia Rule 391-3-1-.02(2)(p) - "Particulate Emissions from Kaolin and Fullers Earth Processes" This rule limits PM emissions from kaolin facilities based on a process rate. The spray dryers will still be subject to the existing limits irrespective of the heat source from the external spray dryer combustion system or internal turbine combustion system. All process equipment is subject and includes equipment put into operation or extensively altered after January 01, 1972. For this regulation, particulate matter emissions may not equal or exceed the allowable rates specified in the below equations.

$E = 3.59P^{0.62}$ ; for equipment with process input weight rate up to and including 30 tons per hour;  
 $E = 17.31P^{0.16}$ ; for equipment with process input weight rate above 30 tons per hour.

For equipment put into operation or extensively altered on or before January 01, 1972. For this regulation, particulate matter emissions may not equal or exceed the allowable rates specified in the below equations. The original Calciner and milling machines have been there since 1957.

$E = 4.1P^{0.67}$ ; for equipment with process input weight rate up to and including 30 tons per hour;  
 $E = 55P^{0.11} - 40$ ; for equipment with process input weight rate above 30 tons per hour.

Where E = The allowable emission rate is in pounds per hour.

P = The process input weight rate is in tons per hour.

PSD Applicability. As described above (*Emission and Operating Caps*), the existing limits will ensure the facility's potential to emit is below PSD Major Source levels, which include emissions from the turbines. No changes will be made to the existing limits. The following limits have been set to avoid Major Source status as defined in PSD:

1. Condition 2.1.1 limits the facility wide SO<sub>2</sub> emissions to less than 250 tons during any period of 12 consecutive months.
2. Condition 2.1.2 limits the facility wide NO<sub>x</sub> emissions to less than 250 tons during any period of 12 consecutive months.
3. Condition 3.2.1 limits specific emission units to less than 0.02 grains/dscf.
4. Condition 3.2.2 limits specific emission units to less than 0.025 grains/dscf.
5. Condition 3.2.3 limits specific emission units to less than 0.04 grains/dscf.
6. Condition 3.2.4 limits rail car loading operations to 0.010 pounds per ton of dry product.
7. Condition 3.2.5 limits dry production through rail car loading to 500,000 tons during any 12 consecutive month period.
8. Conditions 3.2.6 limits production of treated water wash clay from the spray dryers to 25,000 tons per 12 consecutive months.
9. Condition 3.5.3 requires the operation of the Scrubber (W-65) anytime treated clay is processed through the #2 Spray Dryer.

Georgia Rule 391-3-1-.02(2)(d) - Huber Engineered Materials will not discharge or cause the discharge into the atmosphere from the Structured Pigment Boiler (W-430), Evaporator Boiler (W-500), Mine Boiler (S-201), any gases which exhibit 20 percent opacity or greater, except for one six-minute period per hour of not more than 27 percent opacity. Generators do not meet the definition of fuel burning equipment based the definition in the Georgia Rule Book.

“Fuel-burning Equipment” means equipment the primary purpose of which is the production of thermal energy from the combustion of any fuel. Such equipment is generally that used for, but not limited to, heating water, generating or super heating steam, heating air as in warm air furnaces, furnishing process heat indirectly, through transfer by fluids or transmissions through process vessel walls. Therefore, #1 Generator (W-1), #2 Generator (W-2), #3 Generator (W-3), 900 kW Generator (Emission Unit S-101), Turbine Generator No. 1 (T-1), Turbine Generator No. 2 (T-2), Turbine Generator No. 3 (T-3), and 1,000 kW Generator (Emission Unit S-103) is not subject to Rule (d). In particular, generators do not rely on in direct heat transfer associated with production of thermal energy.

Huber Engineered Materials will not discharge or cause the discharge into the atmosphere any gases from the Mine boiler (Emission Unit S-201) which contain particulate matter in excess of the of 0.5 lbs/10<sup>6</sup> BTU heat input.

Huber Engineered Materials will not discharge or cause the discharge into the atmosphere from these sources any gases which contain particulate matter in excess of the rate derived from  $E = 0.5 \cdot (10/R)^{0.5}$ . where: E = allowable particulate emission rate in pounds per million Btu heat input & R = the heat input in million Btu per hour.

- a. Contain particulate matter in excess of 0.18 lbs/10<sup>6</sup> BTU heat input from the Structured Pigment boiler (Emission Unit W-430).
- b. Contain particulate matter in excess of 0.35 lbs/10<sup>6</sup> BTU heat input from the Evaporator boiler (Emission Unit W-500).

Rule 391-3-1-.02(2)(g) requires each dryer, boiler, and turbine comply with a sulfur limit of 2.5 percent by weight for these fuel burning sources rated below 100 MMBTU of heat input.

Rule 391-3-1-.02(2)(b) limits visible emissions from each turbine to less than 40% opacity. No visible emissions are expected from the turbines because natural gas will be used as the fuel. The existing spray dryers are controlled by baghouses. Properly operated baghouses will comply with the 40% opacity limit.

D. Compliance Status

The facility is operating in compliance.

E. Operational Flexibility

Each turbine has two possible modes of operation. The first mode of operation will include venting a turbine into a spray dryer for heat recovery. This is expected to be the most common mode of operation due to the maximum economic benefit at full operating capacity. While venting the exhaust from the turbines into the existing spray dryers for heat recovery, all limits for the spray dryer will remain in affect irrespective of the heat source. The second mode of operation includes venting the turbines directly to the atmosphere without heat recovery. This mode of operation may occur when the plant needs electricity, but production is down or slow. Rule 391-3-1-.02(2)(b) and Rule 391-3-1-.02(2)(g) are the only emission and operational rule limitation that apply when the turbine is vented directly to the atmosphere without heat recovery.

F. Permit Conditions

Condition 3.5.3 requires operation of Scrubber (W-65) to reduce emissions during the production of Treated Wash Clay No. 1 from No. 2 Spray Dryer (W-60).

Condition 3.5.4 requires Huber Engineered Materials will operate all baghouses at all times associated with controlling particulate matter emissions from kaolin production. Huber Engineered Materials will maintain an adequate inventory of replacement filter bags for all baghouses.

Conditions 2.1.1, 2.1.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, and 3.2.6 assures the facility is not a PSD Major source as defined in the 40 CFR 52.21.

Condition 2.1.3 is to avoid being classified as a major HAP source according to the 40 CFR 63.

Condition 3.3.1 incorporates the emission limits according to the 40 CFR 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants".

Condition 3.3.2 incorporates the emission limits according to the 40 CFR 60, Subpart UUU, "Standards of Performance for Calciners and Dryers in Mineral Industries".

Condition 3.3.3 requires compliance with general provisions of NSPS for the 40 CFR 60, Subpart A.

Condition 3.4.1 incorporates requirements of Rule 391-3-1-.02(2)(p) "Particulate Emissions from Kaolin and Fullers Earth Processes".

Condition 3.4.2 incorporates requirements of Rule 391-3-1-.02(2)(b), “Visible Emissions”.

Conditions 3.4.3, 3.4.4, and 3.4.5 limits emissions from fuel burning equipment according to 391-3-1-.02(2)(d).

Condition 3.4.6 limits sulfur content of fuels fired at the facility according to Rule 391-3-1-.02(2)(g).

Conditions 3.5.1, 3.5.2, 3.5.3, and 3.5.4 specify some good air pollution practices expected to occur at the facility.

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**

The permit includes a requirement that Huber Engineered Materials conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

##### **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.

This permit requires a performance test if the Packed Tower Scrubber (W-377) is operated in combination with Baghouses W-371 and W-372 for the control particulate matter from the No. 3 Spray Dryer. The purpose of the test is to establish scrubber and opacity parameters that may assure compliance with the allowable emission limitation.

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

##### **A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

## B. Specific Monitoring Requirements

The No. 3 Spray Dryer is subject to 40 CFR, Part 60, Subpart UUU and is controlled by two baghouses. Subpart UUU requires that a Spray Dryer equipped with a dry control device have a Continuous Opacity Monitoring System (COMS). The COMS is sufficient monitoring to assure compliance with both the PM and opacity standards. Exceedances are defined in Condition 6.1.7(b)(i) as opacity greater than 10 percent for the baghouse option.

If Huber Engineered Materials decided to use the Packed tower scrubber (W-377) in addition to the two baghouses for the additional control of particulate matter emissions on the No. 3 Spray Dryer, then the flow of scrubbant and pressure drop of the gas stream through the scrubber are required to be monitored in addition to opacity, as measured by the COMS. Scrubber parameter ranges and a 3-hour opacity block average are determined during the required performance test to assure a reasonable level of compliance. Exceedances for this option are defined in Conditions 6.1.7vii, viii, and ix.

Based on Condition 3.2.7, this permit limits the facility to 0.5 percent sulfur content for fuel oil burned in all fuel burning sources by weight. This limitation is more stringent than the Georgia rule (g) sulfur limit and will be monitored by fuel supplier certifications. Huber Engineered Materials is required by Condition 6.2.13 to obtain from the fuel oil supplier, a certification that the oil complies with the specifications for No. 2 fuel oil as defined by ASTM D 396 (maximum sulfur content of No. 2 fuel oil is 0.5 percent).

The Structured Pigment Boiler, Mine Boiler, and Evaporator Boilers are subject to Georgia Rule (d) for particulate matter and opacity emissions. The Rule (d) allowable particulate matter emission rate for the Structured Pigment boiler is 0.182 lb/MM BTU with an AP-42 estimated emission rate of 0.0145 lb/MM BTU. The allowable emission rates for the Mine and Evaporative Boilers are 0.50 and 0.353 lb/MM BTU respectively with AP-42 estimated emission rates of 0.0151 and 0.0176 lb/MM BTU respectively. As shown by the PM estimates from AP-42, the boilers are expected to inherently comply. No monitoring will be required for PM or opacity.

Generators (W-1, W-2, & W-3), 300 kW Generator (W-4), 900 kW Generator (S-101), 1,000 kW Generator (S-103), and Turbine Generators (T1, T2, & T3) are all natural gas fired and use No. 2 fuel oil as a back up and are all subject to the 40 percent opacity limitation of Georgia Rules 391-3-1-.02(2) (b). These fuels are very clean burning fuels and the likelihood of the applicable opacity limitation being exceeded is very low; therefore no monitoring is required.

The following baghouses: W-51, W-61, W-465, and W-455 all control emissions from sources subject to the emission limitations of Georgia Rules 391-3-1-.02(2)(p), Condition 3.2, or the limitations of 40 CFR, Part 60, Subpart OOO. To reasonably assure compliance with applicable PM limitations, a Visible Emissions (VE) check is required each day of operation of the emissions units controlled by the baghouses. Corrective actions are required for visible emissions or for visible emissions, which exceed a specified opacity action level. In addition, a Preventive Maintenance Program is required on these baghouses. The program requires weekly monitoring of baghouse pressure drop and the performance of operation and maintenance checks on the baghouses. All VE and Preventative Maintenance Program information is retained by

Huber Engineered Materials and submitted to the Division upon request. Excursions, to be reported semiannually, are specified.

Baghouses, bin vents and filter receivers controlling emissions from individual bins, wet screening operations, bucket elevators, belt and pneumatic conveyances, and bagging operations are exempted from detailed monitoring provisions due to little likelihood of significant Particulate Matter emissions.

Baghouses W-51 and W-61 receive gases from combustion sources, are 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. Baghouses W-371 and W-372 will comply with the provisions of 40 CFR, Part 60, Subpart UUU, "Standards of Performance for Calciners and Dryers in Mineral Industries". The No. 3 Spray Dryer is subject to 40 CFR, Part 60, Subpart UUU and is controlled by baghouses W-371 and W-372. Subpart UUU requires that a Spray Dryer equipped with a dry control device have a Continuous Opacity Monitoring System (COMS). The COMS is sufficient monitoring to assure compliance. An exceedance is defined in Condition 6.1.7b of the permit and an excursion is defined in Condition 6.1.7c. An exceedance for the baghouses are based on a six-minute average opacity that exceed 10% opacity and recorded by the Continuous Opacity Monitoring System installed on the outlet of baghouses W-371 and W-372 controlling emissions from the No. 3 Spray Dryer W-370.

The permit requires all uncontrolled sources except those specifically exempt, be checked daily for obvious mechanical failure and all uncontrolled sources be checked for the presence of visible emissions. The permit includes 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.

Individual Equipment monitoring requirement was added for the installation of a natural gas consumption meter on boilers, dryers and turbines generators according to Condition 5.2.10.

#### Record keeping and Reporting Requirements:

Condition 6.1.7b(vii), (viii), and (ix) will only apply should Huber Engineered Materials choose to rely on Scrubber W-377 as a secondary control device to control PM emissions from No. 3 spray Dryer (Source Code W-370). In this case, the COM for the baghouse and pressure drop and water flow for the scrubber would be used to assure compliance.

Condition 5.2.8 requires the installation, calibration, maintenance, and operation of a continuous monitoring systems (or devices) to record the accumulation of hours of operation on each of the No. 2 fuel oil internal combustion engines listed in Table A.

#### C. Compliance Assurance Monitoring (CAM)

CAM is applicable to each emission unit based on the following criteria:

- Unit is located at a major source that is required to obtain a Title V permit.
- Unit uses a control device to achieve compliance.
- Unit is subject to emission limitation or standard for the applicable pollutant.

- Potential pre-controlled emissions of applicable pollutant from unit are at least 100% of the major source threshold.
- Unit is not otherwise exempt.

This source is a major Title V source. The following are emission units that use control devices to achieve compliance: Railcar Unloading Bucket Elevator (W-251), Milled Product Bagger Feed Bin (W-454), Milled Product Bagger Feed Bin (W-468), #1 Milled Product Pulverizer (W-450), #2 Milled Product Pulverizer (W-452), #3 Milled Product Pulverizer (W-463), Spray Dryer #1 (W-50), Spray Dryer #2 (W-60), Spray Dryer #3 (W-370), Soda Ash Bin (W-10), #1 Makedown Bin (W-80), #2 Makedown Bin (W-90), #3 Makedown Bin (W-100), #1 Spray Dryer Bucket Elevator (W-200), #1 Spray Dryer Bucket Elevator (Belt Conveyor) (W-54), #2 Spray Dryer Bucket Elevator (W-210), #2 Spray Dryer Bucket Elevator (Belt Conveyor) (W-64), #3 Spray Dryer Bucket Elevator (W-220), #3 Spray Dryer Bucket Elevator (Belt Conveyor) (W-375), #1 Pneumatic System ((W-230), #2 Pneumatic System (W-235), #3 Pneumatic System (W-240), #4 Pneumatic System (W-245), Railcar Unloading Bucket Elevator System (W-251), #21 Silo (W-260), #22 Silo (W-270), #23 Silo (W-280), #24 Silo (W-290), #25 Silo (W-300), #26 Silo (W-310), #31 Silo (W-320), #32 Silo (W-330), #33 Silo (W-340), #34 Silo (W-350), #35 Silo (W-360), One-ton Bagger Bin Bucket Elevator (W-21), One-ton Bagger Bin Bucket Elevator and Shifter (W-40), 50 lb. Bagger (W-30), 50 lb. Bagger Bin (W31), #1 Structured Pigment Silo (W-400), #2 Structured Pigment Silo (W-405), #3 Structured Pigment Silo (W-410), Milled Product Feed Silo (W-460), #1 Milled Product Feed Hopper (W-451), #2 Milled Product Feed Hopper (W-453), #3 Milled Product Feed Hopper (W-464), #1 Milled Product Pulverizer (W-450), #2 Milled Product Pulverizer (W-452), #3 Milled Product Pulverizer (W-463), Milled Product Bagger Feed Bins (W-454), Milled Product Bagger Feed Bins (W-468), Milled Product Baggers (50 lb.) (W-457), Milled Product Baggers (Super Sack) (W-67), Meta Storage Bin (Mine Blunger Bldg.) (S-203), Meta Storage Bin (Mine Blunger Bldg.) (S-206), STPP Storage Bin (Mine Blunger Bldg.) (S-209), and Soda Ash Storage Bin (Mine Blunger Bldg.) (S-216). All emission units are subject to a PM limit based on Rule (p), Subpart OOO and /or Subpart UUU.

W-21, W-40, W-400, W-405, W-410, W-460, W-451, W-251, W-453, W-464, W-450, W-452, W-467, W-454, W-468, W-50, W-452, W-463, S-206, S-209, and S-212 are also subject to a PM limit based on 40 CFR 60 Subpart OOO. W-370 is also subject to a PM limit based on 40 CFR 60 Subpart UUU.

The following is an applicability table that considers CAM criteria:

ID Code	Emission Unit	Control Device ID No.	Pollutant	Subject to CAM	Actual Emissions (lb/hr)	Control Device Flow Rate (CFM)	?% Control Efficiency	Pre Controlled (ton/yr)	Bases for Limit	With Limit (ton/yr)	Maximum Production Rate (ton/hr)
<b>Spray Dryers</b>											
W-50	Spray Dryer #1	W51	PM	Yes	6.8	50,000	99%	2,924	Rule (p)	30.0	30.0
W-60	Spray Dryer #2	W-61 W65	PM	Yes	7.5	55,000	99%	3,285	Rule (p)	33.0	30.0
W-370	Spray Dryer #3	W-371 W372 W377	PM	Yes	9.6	55,975 55,975	99%	4,205	NSPS UUU	42.0	44.0
<b>Soda Ash Area</b>											
W-10	Soda Ash Bin	W-11	PM	No	0.004	1,000	99%	1.58	Rule (p)	0.02	1.0
<b>Makedown Area</b>											
W-80	#1 Makedown Bin	W-81	PM	No	0.026	2,300	99%	11.0	Rule (p)	0.12	25
W-90	#2 Makedown Bin	W-91	PM	No	0.031	2,300	99%	13.6	Rule (p)	0.13	35
W-100	#3 Makedown Bin	W-101	PM	No	0.031	2,300	99%	13.6	Rule (p)	0.13	35

ID Code	Emission Unit	Control Device ID No.	Pollutant	Subject to CAM	Actual Emissions (lb/hr)	Control Device Flow Rate (CFM)	% Control Efficiency	Pre Controlled (ton/yr)	Bases for Limit	With Limit (ton/yr)	Maximum Production Rate (ton/hr)
<b>Silo Area</b>											
W-200	#1 Spray Dryer Bucket Elevator	W-201	PM	No	0.030	500	99%	13.1	Rule (p)	0.13	30
W-54	#1 Spray Dryer Bucket Elevator (Belt Conveyor)	W-201	PM	No	0.030	500	99%	13.1	Rule (p)	0.13	30
W-210	#2 Spray Dryer Bucket Elevator	W-211	PM	No	0.030	450	99%	13.1	Rule (p)	0.13	30
W-64	#2 Spray Dryer Bucket Elevator (Belt Conveyor)	W-211	PM	No	0.030	450	99%	13.1	Rule (p)	0.13	30
W-220	#3 Spray Dryer Bucket Elevator	W-221	PM	No	0.14	750	99%	61.3	NSPS OOO	0.56	30
W-375	#3 Spray Dryer Bucket Elevator (Belt Conveyor)	W-221	PM	No	0.14	750	99%	61.3	NSPS OOO	0.56	30
W-230	#1 Pneumatic System	W-231	PM	No	0.026	755	99%	11.0	Rule (p)	0.12	25
W-235	#2 Pneumatic System	W-236	PM	No	0.026	755	99%	11.0	Rule (p)	0.12	25
W-240	#3 Pneumatic System	W-241	PM	No	0.026	500	99%	11.0	Rule (p)	0.12	25
W-245	#4 Pneumatic System	W-246	PM	No	0.026	500	99%	11.0	Rule (p)	0.12	25
W-251	Railcar Unloading Bucket Elevator System	W-252	PM	No	0.051	3,000	99%	22.3	NSPS OOO	2.25	30
W-260	#21 Silo	W-261	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-270	#22 Silo	W-271	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-280	#23 Silo	W-281	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-290	#24 Silo	W-291	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-300	#25 Silo	W-301	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-310	#26 Silo	W-311	PM	No	0.026	450	99%	11.0	Rule (p)	0.12	25
W-320	#31 Silo	W-321	PM	No	0.09	500	99%	39.4	NSPS OOO	0.38	25
W-330	#32 Silo	W-331	PM	No	0.09	500	99%	39.4	NSPS OOO	0.38	25
W-340	#33 Silo	W-341	PM	No	0.09	750	99%	39.4	NSPS OOO	0.38	25
W-350	#34 Silo	W-351	PM	No	0.026	450	99%	11.4	Rule (p)	0.12	25
W-360	#35 Silo	W-361	PM	No	0.026	450	99%	11.4	Rule (p)	0.12	25
<b>Bagging Area</b>											
W-21	One-ton Bagger Bin Bucket Elevator	W-22	PM	No	0.09	500	99%	39.4	NSPS OOO	0.38	35
W-40	One-ton Bagger Bin Bucket Elevator and Shifter	W-22	PM	No	0.09	500	99%	39.4	NSPS OOO	0.38	35
W-30	50 lb. Bagger	W-32	PM	No	0.026	2,000	99%	11.4	Rule (p)	0.12	25
W-31	50 lb. Bagger Bin	W-32	PM	No	0.026	2,000	99%	11.4	Rule (p)	0.12	25

ID Code	Emission Unit	Control Device ID No.	Pollutant	Subject to CAM	Actual Emissions (lb/hr)	Control Device Flow Rate (CFM)	% Control Efficiency	Pre Controlled (ton/yr)	Bases for Limit	With Limit (ton/yr)	Maximum Production Rate (ton/hr)
<b>SAM Silos</b>											
W-400	#1 Structured Pigment Silo	W-401	PM	Yes	0.59	4,300	99%	258	NSPS OOO	2.6	14
W-405	#2 Structured Pigment Silo	W-406	PM	Yes	0.59	4,300	99%	258	NSPS OOO	2.6	14
W-410	#3 Structured Pigment Silo	W-411	PM	Yes	0.59	4,300	99%	258	NSPS OOO	2.6	14
<b>Polygloss Area</b>											
W-460	Milled Product Feed Silo	W-461	PM	No	0.14	1,000	99%	61.3	NSPS OOO	0.60	2
W-451	#1 Milled Product Feed Hopper	W-465	PM	No	0.14	1,000	99%	61.3	NSPS OOO	0.60	2
W-453	#2 Milled Product Feed Hopper	W-465	PM	No	0.14	1,000	99%	61.3	NSPS OOO	0.60	2
W-464	#3 Milled Product Feed Hopper	W-465	PM	No	0.14	1,000	99%	61.3	NSPS OOO	0.60	2
W-450	#1 Milled Product Pulverizer	W-455	PM	Yes	0.55	4,000	99%	241	NSPS OOO	2.4	2
W-452	#2 Milled Product Pulverizer	W-455	PM	Yes	0.55	4,000	99%	241	NSPS OOO	2.4	2
W-463	#3 Milled Product Pulverizer	W-455	PM	Yes	0.55	4,000	99%	241	NSPS OOO	2.4	2
W-454	Milled Product Bagger Feed Bins	W-455	PM	Yes	0.55	4,000	99%	241	NSPS OOO	2.4	2
W-468	Milled Product Bagger Feed Bins	W-455	PM	Yes	0.55	4,000	99%	241	NSPS OOO	2.4	2
W-457	Milled Product Baggers (50 lb.)	W-458	PM	No	0.10	750	99%	43.8	NSPS OOO	0.45	2
W-467	Milled Product Baggers (Super Sack)	W-458	PM	No	0.10	750	99%	43.8	NSPS OOO	0.45	2
<b>Warren County (Degritting Plant)</b>											
S-203	Meta Storage Bin (Mine Blunger Bldg.)	S-204	PM	No	0.001	2,600	99%	0.44	Rule (p)	0.01	0.23
S-206	Meta Storage Bin (Mine Blunger Bldg.)	S-207	PM	Yes	0.36	2,600	99%	158	NSPS OOO	1.56	0.23
S-209	STPP Storage Bin (Mine Blunger Bldg.)	S-210	PM	No	0.12	880	99%	52.6	NSPS OOO	0.53	1.5
S-212	Soda Ash Storage Bin (Mine Blunger Bldg.)	S-213	PM	No	0.12	880	99%	52.6	NSPS OOO	0.53	1.5

## 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 information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by Huber Engineered Materials and reporting is required on a semiannual basis.

Records, including excursions and exceedances, the causes of excursions and exceedances, the corrective action taken, production records for Treated Clay, fuel usage, and the certifications that fuel oil received is distillate oil meeting the permitted sulfur limitation and that only the specified distillate oil is burned are required to be kept by Huber Engineered Materials. Reporting is required on a semiannual basis.

#### 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.

Condition 6.2.4 requires Huber Engineered Materials keep and maintain monthly usage records of Treated Water Wash Clay #1 processed in No.1 Spray Dryer (W-50), No. 2 Spray Dryer (W-60) and No. 3 Spray Dryer (W-370). The records will include the total weight of each material processed, the hazardous air pollutant (HAP) content of each material (expressed as a weight percentage).

Condition 6.2.5 requires the submittal of a written report containing the 12-consecutive month total amounts of Treated Water Wash Clay #1 from No.1 Spray Dryer (W-50), No. 2 Spray Dryer (W-60) and No. 3 Spray Dryer (W-370) emissions of one or more listed hazardous air pollutants for each semiannual period ending June 30 and December 31 of each year. The semiannual reports will be postmarked by the 30th day following the end of the semiannual period (July 30 and January 30, respectively). The report will consist of six 12-consecutive month totals (one 12-consecutive month total for each month in the reporting period). A 12-consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months.

Condition 6.2.6 requires Huber Engineered Materials calculate total monthly HAP emissions. HAP emissions should not exceed 0.83 tons of a single HAP or 2.08 tons of any combination of such listed pollutants during any calendar month. Huber Engineered Materials will be required to notify the Division if there HAP emissions exceed either of the previous monthly limits.

Condition 6.2.7 requires Huber Engineered Materials calculate the monthly NO<sub>x</sub> and SO<sub>2</sub> emission by using the proper equations and records, and report when monthly amounts exceed 20.83 tons during any calendar month.

Condition 6.2.8 requires the Permittee shall calculate the 12-month rolling total of NO<sub>x</sub> and SO<sub>2</sub> emission, and promptly report any exceedances of limits.

Condition 6.2.9 determines the quantity of NO<sub>x</sub> emissions from all No.2 fuel oil fired internal combustion engines.

Condition 6.2.10 shows the equation to calculate the amount of nitrogen oxides emitted by the Boilers, Turbines, and Dryers listed in Table B (W-430, W-500, S-201, W-50, W-60, T1, T2, T2, and W-370) and any new boilers, turbines or dryers:

Condition 6.2.11 shows the equation to determine the quantity of SO<sub>2</sub> emissions from fuel burning sources.

Condition 6.2.12 requires Huber Engineered Materials submit a written report containing the 12-consecutive month total amounts of dry product loaded through the railcar loading operation.

Condition 6.2.13 requires the verification of each shipment of fuel oil received is distillate oil by obtaining fuel oil supplier certifications.

Condition 6.2.14 requires the submission of a written report for each semiannual period ending June 30 and December 31 during which fuel oil was combusted in any fuel-burning source.

Condition 6.2.15 requires the responsible official to certify the fuel supplier certifications represent all of the fuel combusted during the reporting period.

Condition 6.2.16 requires record of all actions taken in accordance with Section 8.22 to suppress fugitive dust from roads, storage piles, or any other source of fugitive dust. The records will include the date and time of occurrence and a description of the actions taken.

## **VII. Specific Requirements**

### **A. Operational Flexibility**

- None.

### **B. Alternative Requirements**

- None.

### **C. Insignificant Activities**

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

### **D. Temporary Sources**

- None.

## E. Short-Term Activities

- None.

## F. Compliance Schedule/Progress Reports

- None.

## G. Emissions Trading

- None.

## H. Acid Rain Requirements

- Not applicable.

## I. Prevention of Accidental Releases

- Not applicable.

## J. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since J.M. Huber has at least some air conditioners, chillers and refrigerators Subpart F is an applicable requirement.

## K. Pollution Prevention

- None.

## L. Specific Conditions

- None.

**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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**Addendum to Narrative**

The 30-day public review started on May 5, 2005 and will end on June 5, 2005. The Division received comments from J.M. Huber Corporation. Comments and responses are as follows.

**Comment 1**

Page 20, Item 5.2.6 – We would like for this to listed as an EXCEPTION as it presently is. The scrubber is not used to determine opacity and this requirement will add an additional financial burden.

**Divisions Response**

Huber has requested an exemption from installing a monitoring device that continuously measures and records the pressure loss on the gas stream through Scrubber W-377. Scrubber W-377 is mainly used as a heat recovery system and not a PM control device. Huber has the option to use the scrubber as part of the particulate matter control system for Spray Dryer No. 3, if they decide. Scrubber W-377 acts as a secondary control device system to baghouses W-371 and W-372. Both baghouses and scrubber are not necessary to obtain compliance with the particulate matter standard of 0.04 grains/dscf (0.092 grams/dscm) in 40 CFR, Part 60, Subpart UUU, “Standards of Performance for Calciners and Dryers in Mineral Industries”. Alone, baghouses W-371 and W-372 operate effectively enough to control PM emissions pertaining to Subpart UUU. Therefore, the following “note” is added prefacing Condition 5.2.6.

**Note: Conditions 5.2.6 shall only apply should the Permittee choose to use Packed Tower Scrubber W-377 in conjunction with Baghouse W371 and Baghouse W372 to control particulate matter emissions from No. 3 Spray Dryer (W-370).**

**Comment 2**

Page 21, Item 5.2.11 – We would like for this item to be removed from the permit. Having to comply with this requirement would be financially prohibitive to the Company.

**Divisions Response**

Compliance assurance monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act (CAA) for large emission units (precontrolled emissions with potential greater than major source threshold) that rely on pollution control device equipment to achieve compliance. Monitoring is conducted to determine that control measures, once installed or otherwise employed, are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements. The CAM approach establishes monitoring for the purpose of: (1) documenting continued operation of the control measures within ranges of specified indicators of performance (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements; (2) indicating any excursions from these ranges; and (3) responding to the data so that the cause or causes of the excursions are corrected.

Spray Dryer #1 (W-50), Spray Dryer #2 (W-60), Spray Dryer #3 (W-370), Railcar Unloading Bucket Elevator System (W-251), #1 Structured Pigment Silo (W-400), #2 Structured Pigment Silo (W-405), #3 Structured Pigment Silo (W410), #1 Milled Product Pulverizer (W-450), #2 Milled Product Pulverizer (W-452), #3 Milled Product Pulverizer (W-463), Milled Product Bagger Feed Bin (W-454), Milled Product Bagger Feed Bin (W-468), and Meta Storage Bin (Mine Blunger Bldg.) (S-206) are subject to CAM requirements according to the 40 CFR 64. The monitoring for CAM is essentially the same as periodic monitoring under the 40 CFR 70, which

the company is already implementing, based on the current Title V permit. The 40 CFR 64 does not include a financial element to determine applicability. No change made.

**Comment 3**

Page 23, Item 5.2.13 – Under Indicator No. 1 Opacity, and Indicator No. 2 Scrubber Liquid Flow Rate, we would like to have the following language removed: “COMS certified per 40 CFR Part 60 Appendix B Zero and span drift are checked daily and a quarterly filter audit is performed” and “Liquid flow meter is calibrated...”

**Divisions Response**

The Spray Dryer NO. 3 relying on Baghouses W-371 and W-372 for compliance must use a COM according to the 40 CFR 60 Subpart UUU. The 40 CFR Part 60 Appendix B is a regulatory requirement that includes the QA/QC Practices for the required COM. This has always been and will remain a requirement. If the company chooses to use Scrubber W-777 as an integral part of the control and monitoring system to assure compliance, a QA/QC Practice and Criteria is also required for the scrubber. If needed, the current verbiage provides the maximum possible flexibility to develop an appropriate QA/QC Practices for Scrubber W-777.

**Comment 4**

Page 31, Item 6.2.10, Table B – the factors for running the turbines and spray dryers in tandem need to be added.

**Divisions Response**

In a conversation with Janice Dowdy, EH&S Manager on April 26, 2005, the comment is withdrawn. The note already included in the draft permit (6.2.10, Table B) was overlooked and satisfies the concerns addressed by J.M. Huber. The note is as follows:

Note: 1 Gas turbine generators will typically vent into a spray dryer. A combined emission factor may be used to calculate emissions from those units.