Facility Name: **J. M. Huber Corporation – Marble Hill Plant**
City: Marble Hill
County: Pickens
AIRS #: 04-13-227-00011

Application #: TV-12268
Date Application Received: May 9, 2000
Date Application Deemed Administratively Complete: June 29, 2001
Date of Draft Permit: August 3, 2001
Permit No: 1455-227-0011-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Jing Wang	James Current
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Toxics	---	---

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 J. M. Huber Corporation – Marble Hill Plant 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: J. M. Huber Corporation – Marble Hill Plant

2. Parent/Holding Company Name

J. M. Huber Corporation

3. Previous and/or Other Name(s)

No previous names were identified.

4. Facility Location

10322 Highway 53 East, Marble Hill, Georgia 30148 (Pickens County).

5. Attainment or Non-attainment Area Location

The facility is not located in a non-attainment area.

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area.

B. Site Determination

None.

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
1455-227-0011-E-01-0	**March 12, 1999**		

D. Process Description

1. SIC Code(s)

SIC Code - 1455

The SIC Code 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.

2. Description of Product(s)

The facility manufactures the calcium carbonate product.

3. Overall Facility Process Description

Marble Hill's process includes mining, crushing, screening, packaging, and shipping. Following is brief description of the processing.

Calcium Carbonate is mined from a multi-level room and pillar designed mine. The product is transported by truck to a primary crusher where the raw material is reduced in size and transported via conveyor to a scalper screen. Material of proper size passes through the screen and is transported via conveyor(s) to one of three storage silos or one of two stockpiles.

Oversized material that is unable to pass through the screen is fed into a cone crusher for additional reduction. It is then deposited along with the screened material onto a conveyor for storage.

After initial crushing, material is removed from the stockpile or silo by front-end loader or truck and transported to a hopper located on one of the outside walls of the mill building. The material is then conveyed by two conveyors to one of two storage tanks located inside the mill building. Other than the initial crushing, all Fine and Coarse processing and packaging of the material occurs in this building.

Fine Material Processing
Material is then fed to the Roller Mill from Storage Tank RM01. After the material is reduced in size, it is conveyed to a Huber Classifier System for separation prior to being sent to various storage tanks. From the tanks the material is packed and bagged for distribution.

Granulated Material Processing
Material is fed to the Impact Mill where after reduction is conveyed to a natural gas-fired rotary dryer. Once the material is dry, it is conveyed to one of two 150-ton storage tanks (GM07 and GM08). Tank GM07 feeds Granular Process One and Tank GM08 feeds Granular Process Two.

Granulated Process One

From feed Tank GM07, material is conveyed to a single deck double sizing screen GM09, where oversized material is discharged into a Cage Mill for further reduction then recycled back through the screen. The acceptable material that passed through one of the two size classifiers is conveyed to Storage Tanks and the remaining material is passed through to a double sizing screens GM10 and GM11 classifies the material and conveys the larger material to another Storage Tank while the remaining material passes through to a sizing screen. Depending upon production requirements, a flop gate can be activated isolating this screen and thus all of the material is conveyed to Storage Tank. The screen receives material from previous screen providing the flop gate is not being operated and classifies the material into three different sizes. The undersized material is conveyed to a recycle tank located adjacent to the dryer. The remaining material is classified into two different sizes and conveyed to Storage Tanks.

Granulated Process Two

From feed tank material is conveyed to a single deck screen. The screen classifies the material and passes it to a Sturtevant Separator. Over-sized material unable to pass through the screen is transferred to a Cage Mill then recycled back through the screen. Material reaching the Sturtevant Separator is transferred to one of three 150-ton storage tanks. Material stored in storage tank is transferred to a mixer where it is blended with material from the roller mill then conveyed to Storage Tank for packing and bagging.

4. Overall Process Flow Diagram

The process flow diagrams are included.

E. Regulatory Status

1. PSD/NSR

J. M. Huber Corporation – Marble Hill Plant is a minor source under PSD/NSR regulations.

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	Yes	✓		
PM_{10}	Yes	✓		
SO_2	Yes			✓
VOC	Yes			✓
NO_x	Yes			✓

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
CO	Yes			✓
TRS	--			
H_2S	--			
Individual HAP	--			
Total HAPs	--			

3. MACT Standards

This facility is not subject to 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:

The Permittee shall limit production as not to produce calcium carbonate in excess of 1,000,000 tons per year, which was used to calculate the PM emission in the TV application. It was a voluntary restriction taken by the Permittee, and in its TV application there is no request to remove it, therefore, the production limitation will be included.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment – Generic conditions, not specifically related to this facility.
- Emission and Operating Standards – None.

C. Compliance Status

Not Applicable.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

None.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility processes calcium carbonate products.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Crushing System					
DH01	Dump Hopper	391-3-1-.02(2)(n)	3.4.5, 5.2.4, 6.2.3, 6.2.6	N/A	None
CS01	130/150 Impact Crusher System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC01	Belt Conveyor 1	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
CS02	6’ x 16’ Single Deck Screen	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC02	Belt Conveyor 2 (Radial Stacker)	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC03	Belt Conveyor 3	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC04	Belt Conveyor 4	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC05	Belt Conveyor 5	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC06	Belt Conveyor 6	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
Stockp-iles	Stockpile Area	391-3-1-.02(2)(n)	3.4.5, 6.2.6	N/A	None
Roller Mill System #1					
DH02	Dumper Hopper	391-3-1-.02(2)(n)	3.4.5, 5.2.4, 6.2.3, 6.2.6	N/A	None
BC06A	Belt Conveyor 6A	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BU01	Bucket Elevator 1	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
BC07	Belt Conveyor 7	391-3-1-.02(2)(e) 391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.4, 6.2.1, 6.2.2, 6.2.3, 6.2.5	N/A	None
RM01	Roll Mill 1-150 Ton Feed Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC01	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
VF01	Vibratory Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.2.2, 5.3.1, 6.1.7	DC01	Baghouse
RM02	73612 Raymond Roller Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC01	Baghouse
PC01	Pneumatic Conveyor 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC01	Baghouse
RM03	Roll Mill 1-Air Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC01	Baghouse
Roller Mill System #2					
RM04	100 Ton Storage Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC03	Baghouse
VF03	Vibratory Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.2.2, 5.3.1, 6.1.7	DC03	Baghouse
RM05	66” Raymond Roller Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC03	Baghouse
PC08	Pneumatic Conveyor 8	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC03	Baghouse
Granular System					
GM01	Granular Mill 100 Ton Feed Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC02	Baghouse
VF02	Vibratory Feeder	391-3-1-.02(2)(e)	3.4.1, 3.4.2, 4.2.2, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.3.1, 6.1.7	DC02	Baghouse
GM02	Universal Hammer Mill # 4136	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC02	Baghouse
SC01	Screw Conveyor 1	391-3-1-.02(2)(e)	3.4.1, 3.4.2, 4.2.2, 4.2.3, 5.2.1, 5.3.1, 6.1.7	DC02	Baghouse
GM03	Fluid Bed Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) NSPS OOO	3.3.2, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.3.1, .1.7, 6.2.1, 6.2.2, 6.2.7	DC02	Baghouse
SC02	Screw Conveyor 2	391-3-1-.02(2)(e)	3.4.1, 3.4.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC04	Baghouse
SC03	Screw Conveyor 3	391-3-1-.02(2)(e)	3.4.1, 3.4.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC04	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
GM07	150 Ton Feed Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC04	Baghouse
BU02	Bucket Elevator 2	391-3-1-.02(2)(n) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.4.3, 3.4.4, 4.2.1, 5.2.4, 6.2.1, 6.2.2	N/A	None
SC05	Screw Conveyor 5	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC05	Baghouse
SC06	Screw Conveyor 6	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC05	Baghouse
GM08	150 Ton Storage Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.7	DC05	Baghouse
SC07	Screw Conveyor 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC06	Baghouse
BU03	Bucket Elevator 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC06	Baghouse
BU04	Bucket Elevator 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC06	Baghouse
BU05	Bucket Elevator 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC06	Baghouse
SC08	Screw Conveyor 8	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC06	Baghouse
GM09 - GM15	Seven 5’ X 10’ Single Deck Screen	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.7	DC06	Baghouse
SC09	Screw Conveyor 9	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC06	Baghouse
GM16 - GM17	Packer(Bagger) Bins	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC06	Baghouse
GM18	48” Cage Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC06	Baghouse
GM19	150 Ton Feed Tank 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC07	Baghouse
SC10	Screw Conveyor 10	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC07	Baghouse
GM20	Sturtevant Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC08	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
GM21	Dense Phase Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC09	Baghouse
TK11	400 Ton Storage Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.4.2, 3.5.1, 3.5.2, 4.2.2, 5.2.2, 5.2.3, 5.2.6, 6.1.7	DC09	Baghouse
Ball Mill					
PC02	Pneumatic Conveyor 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC10	Baghouse
BM01	150 Ton Storage Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.4.2, 3.5.1, 3.5.2, 4.2.2, 5.2.2, 5.2.3, 5.2.6, 6.1.7	DC10	Baghouse
SC16	Screw Conveyor 16	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC10	Baghouse
BM02	9’ X 22’ Ball Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC11	Baghouse
BU07	Bucket Elevator 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC11	Baghouse
SC17	Screw Conveyor 17	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC11	Baghouse
BM03	Huber Air Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC11	Baghouse
PC03	Pneumatic Conveyor 3	391-3-1-.02(2)(e)	3.4.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC11	Baghouse
Surface Treatment System					
TS01	150 Ton Storage Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC12	Baghouse
SC19	Screw Conveyor 19	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.3.1, 6.1.7	DC12	Baghouse
TS02	Chemical Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7	DC12	Baghouse
TS03	Mixer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7	DC12	Baghouse
Packing System					
PB01	Packaging System 1-5 Ton Packer (Bagger) Bins	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC13	Baghouse
PB1A	Temporary Packer (Bagger) Bins	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC13 A	Baghouse
PB02	Packaging System 2-35 Ton Packer (Bagger) Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC14	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
BC08	Belt Conveyor 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC14	Baghouse
PB03	Packaging System 3 - 5 Ton Packer (Bagger) Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC15	Baghouse
Carpco Mag-net	Carpco Magnet	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.3, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 5.2.2, 5.3.1, 6.1.7	DC15	Baghouse
BU08	Bucket Elevator 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC15	Baghouse
PB04	Packaging System 4 - 25 Ton Bagger Bin (MEA)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC15	Baghouse
PB05	Packaging System 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC16	Baghouse
Storage Tanks					
PC04-PC19	Pneumatic Conceyor 4 - 19	391-3-1-.02(2)(n)	3.4.5, 5.2.4, 6.2.6	N/A	None
DP22-DP28	Dense Phase/Pneumatic Conveyors	391-3-1-.02(2)(n)	3.4.5, 5.2.4, 6.2.6	N/A	None
TK01	400 Ton Storage Tank 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC17	Baghouse
TK02	400 Ton Storage Tank 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC18	Baghouse
TK03	200 Ton Storage Tank 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC19	Baghouse
TK04	200 Ton Storage Tank 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC20	Baghouse
TK05	200 Ton Storage Tank 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC21	Baghouse
TK06	200 Ton Storage Tank 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC22	Baghouse
TK07	200 Ton Storage Tank 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC23	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
TK08	200 Ton Storage Tank 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC24	Baghouse
TK09	200 Ton Storage Tank 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC25	Baghouse
TK10	200 Ton Storage Tank 10	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC26	Baghouse
TK12	400 Ton Storage Tank 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC27	Baghouse
TK13	400 Ton Storage Tank 13	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC28	Baghouse
TK14	100 Ton Storage Tank 14	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC29	Baghouse
TK15	100 Ton Storage Tank 15	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC31	Baghouse
TK16	200 Ton Storage Tank 16	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC30	Baghouse
TK17	200 Ton Storage Tank 17	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC32	Baghouse
TK18	200 Ton Storage Tank 18	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) NSPS OOO	3.3.1, 3.4.1, 3.4.3, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 4.2.2, 4.2.3, 5.2.2, 5.2.3, 5.3.1, 6.1.7, 6.2.1, 6.2.2	DC33	Baghouse

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

C. Equipment & Rule Applicability

Emission and Operating Caps –

None.

Applicable Rules and Regulations -

1. 40 CFR, Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants" is listed in the permit as Condition 3.3.1. Each listed piece of equipment in Table 3.1 subject to this requirement has 3.3.1 in the column, ACorresponding Permit Condition≅. This

requirement applies to any crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station constructed, reconstructed, or modified after August 31, 1983. Emission requirements associated with this rule include no visible fugitive emissions greater than 10 percent opacity. Stack emissions shall not contain particulate matter in excess of 0.05 g/dscm (0.02 grains/dscf) and exhibit greater than 7 percent opacity.

2. The Permittee shall not cause, let, permit, suffer, or allow particulate emissions from equipment at the facility subject to Georgia Rule 391-3-1-.02(2)(e), "Particulate Emissions from Manufacturing Processes," in total quantities equal to or exceeding the allowable rates specified in the equations given below.
[391-3-1-.02(2)(e)]

   a. For equipment constructed or extensively modified after July 2, 1968, the following equations shall be used to determine allowable emission rates:

      i. $E = 4.1\ P^{0.67}$;

   b. For equipment constructed or put in operation on or before July 2, 1968, the following equations shall be used to determine allowable emission rates:

      i. $E = 4.1\ P^{0.67}$, for process input weight rate up to and including 30 tons per hour;

      ii. $E = 55\ P^{0.11} - 40$, for process input weight rates in excess of 30 tons per hour.

      In the above equations: E = allowable emission rate in pounds per hour; and
      P = process input weight rate in tons per hour.

3. Georgia Rule 391-3-1-.02(2)(b)1 AVisible Emissions≅ is an applicable Georgia Rule, which applies to all facilities and is listed in the permit as Condition 3.4.3. Each listed piece of equipment in Table 3.1 subject to this requirement has 3.4.3 in the column, ACorresponding Permit Condition≅. Visible emissions shall not equal or exceed forty (40) percent.

4. Georgia Rule 391-3-1-.02(2)(n) AFugitive Emissions≅ is an applicable Georgia Rule, which applies to all facilities and is listed in the permit as Condition 3.4.4 and 3.4.5. Each listed piece of equipment in Table 3.1 subject to this requirement has 3.4.4 or 3.4.5 in the column, ACorresponding Permit Condition≅. For 130/150 Impact Crusher (Source Code CS01), the Permittee shall only operate it, when the facility has sufficient water and water pressure to adequately supply. Also fugitive emissions from any source subject to this rule shall not exhibit greater than or equal to 20 percent opacity.

5. Georgia Rule 391-3-1-.02(2)(g) ASulphur Dioxide≅ is an applicable rule, which applies to all facilities and is listed in the permit as Condition 3.5.3. Each listed piece of equipment in Table 3.1 subject to this requirement has 3.5.3 in the column, ACorresponding Permit Condition≅. All fuel burning sources below 100 million BTU's of heat input per hour shall not burn fuel containing more than 2.5 percent sulfur, by weight.

D. Compliance Status

This facility indicates that it is in compliance with all applicable rules and regulations.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

Permit Condition 3.3.1 states the any crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station constructed, reconstructed, or modified after August 31, 1983, is subject to 40 CFR, Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants". Emission requirements associated with this rule include no visible fugitive emissions greater than 10 percent opacity. Stack emissions shall not contain particulate matter in excess of 0.05 g/dscm (0.02 grains/dscf) and exhibit greater than 7 percent opacity.

Permit Condition 3.4.1 states the equations used to calculate the allowable rates of emission from manufacture process equipment constructed or operated. Particulate matter emissions can not equal to or exceed the allowable rates specified in the stated equations.

Permit Condition 3.4.2 states that the stack limitation for Baghouses DC2, DC10, DC11 and DC18, which is 0.037 g/dscm (0.015 grains/dscf) of Particular Matter, as requested by Application No. 10890.

Permit Condition 3.4.3 states that any gases discharged from any air contaminant source shall not exceed 40% opacity, as required by Georgia Air Quality Rule 391-3-1-.02(2)(b)1.

Permit Condition 3.4.4 states that the Permittee shall only operate 130/150 Impact Crusher (source code CS01) when the facility has sufficient water and water pressure to limit fugitive emission.

Permit Condition 3.4.5 limits the fugitive emission from any source, which is subject to Georgia Air Quality Rule 391-3-1-.02(2)(n) not to exhibit greater than or equal to 20 percent opacity.

Permit Condition 3.5.1 requires that the Permittee shall operate all baghouses at all times.

Permit Conditions 3.5.2 requires that the Permittee shall maintain an adequate inventory of replacement filter bags for all baghouses.

Permit Condition 3.5.3 prohibits the Permittee from firing any fuel other than natural gas. This ensures compliance with Georgia Rule (g).

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

A. General Testing Requirements

The Permit Condition 4.1.1 specifies that a performance test may be required at anytime upon request by EPD to determine compliance with the Permit. Condition 4.1.2 requires a thirty day written notice and a test plan prior to any testing. The test methods for measuring emissions are listed in Condition 4.1.3.

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.

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

A. General Monitoring Requirements

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns and repairs. A repair or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

Most sources at the facility have baghouses for control of Particulate Matter (PM) emissions and are subject to the PM and Visible Emissions limitations of Condition 3.4.2, Rule (e), (b) and /or 40 CFR Part 60, Subpart OOO and /or Rule (n). The process that are substantial sources of PM emissions are controlled by the larger baghouses installed at the facility and are subject to the monitoring requirements of Condition 5.2.2 and 5.2.3 to reasonably assure compliance with applicable emissions limitations. 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. 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 Mainenance Program information is retained by the Permittee and submitted to the Division upon request. Excursions, to be reported semiannually, are specified.

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

Baghouse DCO2, which receives gases from a combustion source, is 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. The specified excursions are to be reported semiannually.

Sources of particulate matter emissions, which have no air pollution control equipment, are required to be inspected each day of operation for visible emissions and/or malfunction which might cause emissions. The permit includes a requirement to take corrective action and keep records. If problems are revealed during the daily check, they must be reported in the semiannual report if not corrected within 24 hours. The specified excursions are to be reported semiannually.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains requirements for the maintenance of all records of a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from applicable requirements

B. Specific Record Keeping and Reporting Requirements

In accordance with 40 CFR, Part 60, "Standard of Performance for New Stationary Sources (NSPS)", the Permittee shall comply with the reporting and record keeping requirements of 40 CFR, Part 60, Subpart A and furnish the Division written notification.

As required by 40 CFR, Part 60, Subpart OOO, "Standard of Performance for Nonmetallic Mineral Processing Plants", the Permittee shall comply with the detailed reporting and record keeping and shall submit the required information listed in Permit Condition 6.2.2 about the existing Subpart OOO equipment being replaced and the replacement piece of equipment.

Permit Condition 6.2.3 requires that the Permittee shall keep the monthly production records of calcium carbonate suitable for inspection.

Permit Condition 6.2.4 requires that the Permittee calculate the twelve consecutive month total of calcium carbonate from the records kept in Condition 6.2.3 and submit a written report of each semiannual period ending June 30 and December 31 to report the production of calcium carbonate in the entire facility.

Permit Condition 6.2.5 requires that the Permittee shall report any exceedance of production of calcium carbonate during any calendar month, and this notification shall be postmarked by the fifteenth day of the following month.

Permit Condition 6.2.6 requires the Permittee shall maintain the record of all actions taken to suppress fugitive dust from roads, storage piles, or any other source of fugitive dust.

Permit Condition 6.2.7 requires the Permittee must record the amount of Nature Gas fired in fuel burning sources. This ensures compliance with Georgia Rule (g).

VII. Specific Requirements

A. Operational Flexibility

- Not applicable.

B. Alternative Requirements

- Not applicable.

C. Insignificant Activities

- refer to §4.10 of the Title V permit application

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

Written comments were received from J. M. Huber – Marble Hill Plant on June 18, 2002. The Public Notice for this Permit was published in Pickens County Progress the on May 23, 2002. The public comment period ended on June 23, 2002. No comments were received from EPA. The comments are summarized below followed by a discussion of the comments and any changes made to the permit as a result.

Below are EPD's responses to comments raised by J. M. Huber – Marble Hill Plant.

1. The J. M. Huber wanted to change the "Overall Facility Process Description" to the following:

> Marble Hill's process includes mining, crushing, grinding, screening, packaging, and shipping. Following is brief description of the processing.
>
> Calcium Carbonate is mined from a multi-level room and pillar designed mine. The product is transported by truck to a primary crusher where the raw material is reduced in size and transported via conveyor to a scalper screen. Material of proper size passes through the screen and is transported via conveyor(s) the stockpile area.
>
> Oversized material that is unable to pass through the screen is returned to the primary crusher for additional reduction and is then handled as described above.
>
> After initial crushing, material is removed from the stockpile area by front-end loader and either loaded into trucks for shipment or transported to an outside feed hopper. Material from the feed hopper is conveyed to one of the three storage tanks located inside the mill building. Other than the initial crushing, all Fine and Coarse processing occurs in this building. Packaging of the finished product takes place both in this building and adjacent warehouse.
>
> **Fine Material Processing**
> Material is fed to the two Roller Mill from feed Tanks RM01 and RM04. After the material from Roller Mill 1 is reduced in size, it is conveyed to an air Classifier System for separation prior to being sent to various finished product storage tanks. Material from Roller Mill 2 does not undergo a classification process – it is conveyed directly off the mill to various finished product storage tanks. Product from the finished product storage tanks is either bulk-loaded into tanker trucks or pneumatically conveyed to various bagger bins for packaging and distribution.
>
> **Granulated Material Processing**
> Material is fed to a Universal hammer Mill from feed tank GM01. After reduction it is conveyed to a natural gas-fired fluid bed dryer and then to storage tank GM07. From tank GM07 it is conveyed via screw conveyors and bucket elevators to (5) five-deck vibratory screens. Oversize product is conveyed to Cage Mill GM18 for further size reduction. Product which passes through the screens is conveyed to various storage tanks and bagging bins.
>
> **Ball Mill**
> Material is bed from feed tank BM01 to a horizontal ball mill. The discharged material is conveyed to an air classifier system. Product, which is too coarse to be finished product, is returned to the inlet side of the ball mill for reprocessing. Finished product is conveyed to either finished product storage tanks or a surface treatment system.

Surface Treatment
Material from TS01 is fed through a series of heated mixers it is coated enhance its properties. The finished product from this process is conveyed to either the finished product silos or to a bagging bin.

Division's Response: Changes made.

2. J. M. Huber requests to add the following table to the Table 3.1:

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Crushing System					
VG01	Vibrating Grizzly 1	391-3-1-.02(2)(n)	New identified Equipment	N/A	None
BC02A BC03A BC04A	Belt Conveyors 2A, 3A and 4A	391-3-1-.02(2)(n)	New identified Equipment – BC02A was previously BC6	N/A	None
PF01	Plate Feeder	391-3-1-.02(2)(n)	New identified Equipment	N/A	None
Roller Mill System #1					
VF04	Vibratory Feeder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	New identified Equipment	DC01	Baghouse
Roller Mill System #2					
PC04	Pneumatic Conveyor 4	391-3-1-.02(2)(e)	New Identified Equipment	DC10, DC17, DC18, DC19, DC27, DC28	Baghouses
PC05	Pneumatic Conveyor 5	391-3-1-.02(2)(e)	New Identified Equipment	DC23	Baghouse
Granular System					
SC18	Screw Conveyor 18	391-3-1-.02(2)(e)	New Identified Equipment	DC08	Baghouse
PC30	Pneumatic Conveyor 30	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	New Identified Equipment	DC08	Baghouse
PB06-PB08	Packaging System Bins 6, 7 and 8	391-3-1-.02(2)(n)	New Identified Equipment	N/A	None
SC04	Screw Conveyor 4	391-3-1-.02(2)(n)	New Identified Equipment	N/A	None
GM22	1 ton Hopper	391-3-1-.02(2)(n)	New Identified Equipment	DC04	Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Ball Mill					
AS01 AS02	Air Slides 1 and 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	New Identified Equipment	DC10 or DC11	Baghouse
PC20	Pneumatic Conveyor 20	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	New Identified Equipment	DC12, DC 21, DC25	Baghouses
SC11-14	Screw Conveyor 11-14	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	Existing but newly Identified Equipment	N/A	None
Storage Tanks					
PC07	List Under Surface Treatment Pneumatic Conveyor 7	391-3-1-.02(2)(n)	Existing but newly Identified Equipment	N/A	None
Rock Sorters					
SB01	Stacker Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None
SB02	Stacker Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None
SB03	Stacker Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None
PB01	Picking Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None
TB01	Transfer Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None
FB01	Feed Belt	391-3-1-.02(2)(n)	New Equipment	N/A	None

Division's Response: Division agrees that the existing equipment will be added to the Table 3.1, but the new equipment will not be added to the table 3.1. J. M. Huber should submit applications of the new equipment to the Division, and after reviewing procedure, the Division may add these new equipment to the Title V Permit Amendment.

3. J. M. Huber requests to change 5 percent and 10 percent to 7 percent and 40 percent respectively in the condition 5.2.2b. The changed condition 5.2.2 is the following:

5.2.2 The Permittee shall perform a check of visible emissions from all baghouses (including process baghouses) controlling emission from sources listed in Section 3.1 of this permit, and from sources added or replaced in accordance with the provisions of condition 7.1.2. Baghouses controlling emissions from silos with dedicated bin vents, wet screening operations, bucket elevators, screw conveyors, bagging operations and pneumatic conveyors are exempt from this condition. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The check shall be conducted at least once for each day or portion of each day of operation and shall be conducted using the following procedure:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources

that exhibit visible emissions, the Permittee shall comply with paragraph b or c of this condition.

b. For each source determined to be emitting visible emissions, the Permittee shall determine whether the emissions equal or exceed the opacity action level at any time during the determination fro that source using the procedure specified in paragraph d of this condition, except the person performing the determination shall have received additional training acceptable to the Division to recognize the appropriate opacity level and the determination shall cover a period of three minutes. The opacity action level for baghouses subject to the emission limitations of the NSPS regulations is 7% percent, and for baghouses not subject to NSPS regulations is 40 percent. The results shall be recorded in the daily (VE) log. For sources that exhibit visible emissions of greater than or equal to the opacity action level, the Permittee shall comply with paragraph c of this condition.

Division's Response: No changes made.

40 CFR 70.6(a)(3)(i)(B) requires EPD to establish periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance for when the applicable requirement does not already require such monitoring. For the baghouses listed in Table 3.1 of the permit, the applicable requirements (Georgia Rules(b) and (p)) do not contain any monitoring requirements. Thus the requirements of 40 CFR 70.6(a)(3)(i)(B) apply. The Division believes that both conditions 5.2.3 and 5.2.4 are necessary to ensure that the baghouses are properly operated and maintained, which in turn, provides a reasonable assurance of compliance with the applicable particulate matter and opacity standards and limitations.

The Division believes that baghouses designed to meet the particulate matter limits of NSPS OOO and similar particulate matter limits should not exhibit visible emissions when properly operated and maintained. Thus, observation of visible emissions equal to or greater than 5% should trigger investigation and corrective action. The Division also believes that baghouses designed to meet the particulate matter limit of Georgia Rule (p) should not exhibit visible emissions of equal to or greater than 10% when properly operated and maintained. Thus the opacity action level of less than or equal to 10% is appropriate for these sources. Thus they will not be modified.

4. J. M. Huber requests that EPD substitute the following permit condition for Condition 5.2.3:

5.2.3 Within 60 days of the issuance of this permit, the Permittee shall develop and implement a Preventative Maintenance Program for the baghouses specified in 5.2.2 to reasonably assure that the emission limits in this Title V permit are met. The program shall be available to the Division upon request.

Division's Response: No changes made. The Division considers monitoring under 40 CFR 70.6(a)(3)(i)(B) to include pressure drop checks as an integral part of the overall monitoring strategy to show baghouses are properly operated as needed to assure compliance. Pressure drop is a widely recognized parameter used for evaluating performance and proper operation of baghouses. EPD considers pressure drop as an important element of the Preventative Maintenance Plan.

The proposed alternative condition 5.2.3 does not provide an enforceable mechanism to yield reliable data from the relevant time period that are representative of the source's compliance as required by 40 CFR 70.6(a)(3)(i)(B). Thus they will not be modified.