

Facility Name: **J. M. Huber – Marble Hill Plant**

City: Marble Hill

County: Pickens

AIRS #: 04-13-227-00011

Applications #: 16007, 15369 & 16109

Date SIP Application Received: May 21, 2004 & March 17, 2005

Date Title V Application Received: February 1, 2005

Permit No: 1455-227-0011-V-01-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>TOXICS</b>	n/a	n/a

## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1), 391-3-1-.03(2), and 391-3-1-.03(10). of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

**I. Facility Description**

A. Existing Permits

**Table 1: Current Title V Permit and Amendments**

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
1455-227-0011-E-01-0	March 12, 1999	✓	
1455-227-0011-V-01-0	November 12, 2002	✓	

**Table 2: Comments on Specific Permits**

Permit Number	Comments
1455-227-0011-E-01-0	Transition permit.
1455-227-0011-V-01-0	Initial Title V permit.

B. Regulatory Status

1. PSD/NSR/RACT

Per 40 CFR 52.21 Prevention of Significant Deterioration (PSD), this plant is not considered an existing major source because its potential emissions of both particulate matter and PM-10 are less than 250 tons per year. Also, the plant is not one of the 28 listed categories and, thus, PSD major source threshold is 250 tons and not 100 tons.

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

**II. Proposed Modification**

**A. Description of Modification**

In Application No. 16007, J. M. Huber is requested permission to construct and operate of a new Raymond Roller Mill process line consisting of a Dump Hopper (DH03), two Vibratory Feeders (VF05 & VF06), a Belt Conveyor (BU09), a Feed Tank (RM06), a Raymond Roller Mill (RM07), and a Pneumatic Conveyor (PC31). All are to be controlled by baghouse (DC34). Also, this amendment deals with Application No. 15369 by incorporating the off permit modification done to the impellor of the classifier of the NSPS Subpart OOO Raymond Roller Mill (RM05) to increase its process input rate from 10 to 15 tons/hr. This change is not to affect the volumetric flow rate to Baghouse (DC03) and is not to alter emissions. Additionally, this amendment deals with Application No. 16109 by incorporating the off permit modification to install a Pin Mixer (PM-01) for mixing and metering products from the existing NSPS Subpart OOO Roller Mill #2 & # 5 (RM-02 & RM-05) prior to pneumatically conveying them to the existing Bin (PB-04) controlled by Baghouse (DC-01). This change is not to affect the volumetric flow rate to the referenced Baghouse nor alter emissions.

**B. Emissions Change**

In its March 9, 2005 submittal, J. M. Huber estimated the following numbers for changes in emissions due to the modifications purposed in Application No. 16007:

**Table 4: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	Yes	21.27	21.27
PM <sub>10</sub>	Yes	21.27	21.27
SO <sub>2</sub>	Yes	0.02	0.02
VOC	Yes	0.21	0.21
NO <sub>x</sub>	Yes	3.75	3.75
CO	Yes	3.15	3.15
TRS	Yes	0	0
H <sub>2</sub> S	Yes	0	0
Individual HAP	Yes	0	0
Total HAPs	Yes	0	0

**C. Title I Modification**

- PSD/NSR Applicability

Per J. M. Huber March 9, 2005 submittal, the plant currently has a particulate matter potential to emit of 155.28 tons/yr and the addition of the new Raymond Roller Mill process line will increase this potential to emit, by 21.27, to 176.56 tons/yr. Therefore, this modification is neither subject to PSD or NSR nor will trigger their applicability.

- NSPS Modification

The addition of the new Raymond Roller Mill process line is not considered an NSPS modification.

- NESHAP Modification

This change is not a modification under Part 61.

### **III. Facility Wide Requirements**

#### **A. Emission and Operating Caps**

None associated with this permit amendment.

#### **B. Applicable Rules and Regulations**

- Rules and Regulations Assessment – No new facility wide rules or emission and operating standards are being impacted by this permit amendment.
- Emission and Operating Standards – No new facility wide rules or emission and operating standards are being impacted by this permit amendment.

#### **C. Compliance Status**

No compliance issues were noted by the Applicant.

#### **D. Operational Flexibility**

None associated with this permit amendment.

#### **E. Permit Conditions**

None associated with this permit amendment.

### **IV. Regulated Equipment Requirements**

#### **A. Brief Process Description**

The facility processes calcium carbonate.

#### **B. Equipment List for the New or Modified Process(es)**

Please see Section 3.1 of the enclosed permit amendment.

#### **C. Equipment & Rule Applicability**

- Emission and Operating Caps – None associated with this permit amendment.

Applicable Rules and Regulations - The new Raymond Roller Mill process line and its associated equipment will be subject to the provisions of 40 CFR Part 60 Subpart OOO “Standards of Performance for Nonmetallic Mineral Processing Plants.”

Emission and Operating Standards: See condition 3.3.1 of Permit No. 1455-227-0011-V-1-0 which includes emissions standards applicable to the new emissions units.

**D. Compliance Status**

None associated with this permit amendment.

**E. Operational Flexibility**

None associated with this permit amendment.

**F. Permit Conditions**

Standard mineral permit condition 7.1.2 has been added to the permit.

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

- A. Individual Equipment: Per condition 4.2.1 of Permit No. 1455-227-0011-V-1-0, NSPS Subpart OOO testing is required for the new Raymond Roller Mill process line and its associated equipment.
- B. Equipment Groups (all subject to the same test requirements): None associated with this permit amendment.

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

- A. Individual Equipment: Condition 5.2.2 & 5.2.3 monitoring will be applicable to the new baghouse (DC34) controlling emissions from for the new Raymond Roller Mill process line and its associated equipment.
- B. Equipment Groups (all subject to the same monitoring requirements): None associated with this permit amendment.

**VII. Other Record Keeping and Reporting Requirements**

None associated with this permit amendment.

**VIII. Specific Requirements**

- A. Operational Flexibility

None.

B. Alternative Requirements

None.

C. Insignificant Activities

None.

D. Temporary Sources

None.

E. Short-Term Activities

None.

F. Compliance Schedule/Progress Reports

None.

G. Emissions Trading

None.

H. Acid Rain Requirements

None.

I. Prevention of Accidental Releases

None.

J. Stratospheric Ozone Protection Requirements

None.

K. Pollution Prevention

None.

L. Specific Conditions

None.