

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **General Chemical Corporation**

City: Augusta

County: Richmond

AIRS #: 04-13-245-00008

Application #: 14580

Date SIP Application Received: July 7, 2003

Date Title V Application Received: July 7, 2003

Permit No: 2819-245-0008-V-01-1

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2819-245-0008-V-01-0	January 8, 2001	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2819-245-0008-V-01-0	Initial Title V Permit

B. Regulatory Status

1. PSD/NSR/RACT

The facility was potentially a “major” source under PSD/NSR regulations, but may have taken limits to remain as a “minor” source and avoid a PSD/NSR review.

A 0.08 lb acid mist/ton of acid produced (based on the 850 ton per day maximum) limit was in place to avoid PSD.

2. Title V Major Source Status by Pollutant

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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			X
PM ₁₀	Yes			X
SO ₂	Yes	X		
VOC	Yes			X
NO _x	Yes			X
CO	Yes			X
TRS	Yes			X
H ₂ S	Yes			X

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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
Individual AP	Yes			X
Total HAPs	Yes			X

II. Proposed Modification

A. Description of Modification

Condition 3.2.1 and 6.1.7.c.1 were modified to more accurately represent the 850 ton per day sulfuric acid limit as a 365-day rolling average. The limit was in place as a PSD avoidance limit and therefore should be subject to a yearly average.

C. PSD/NSR Applicability

No PSD issues arise from this change.

III. Facility Wide Requirements

A. Emission and Operating Caps

The facility operates under an 850 ton 100% sulfuric acid per day production limit. This original limit was for PSD Avoidance and should have been a yearly limit. The facility requested a 365-day rolling average instead of the daily limit.

B. Applicable Rules and Regulations

No changes to rule or regulation applicability occur due to this modification.

C. Compliance Status

No compliance issues.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

Condition 3.2.1 originally read:

3.2.1 The Permittee shall not produce more than 850 tons per day of 100% sulfuric acid.

Condition 3.2.1 now reads:

3.2.1 The Permittee shall not produce more than 850 tons per day of 100% sulfuric acid, calculated as a daily average over a 365-day rolling basis.

IV. Regulated Equipment Requirements

No changes due to this modification.

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

No changes due to this modification.

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

No changes due to this modification.

VI. Other Record Keeping and Reporting Requirements

The excursion included in condition 6.1.7.c was modified to accurately reflect the changes to condition 3.2.1.

Original condition 6.1.7.c.1:

1. Any day that the Permittee produces more than 850 tons of 100% sulfuric acid

New condition 6.1.7.c.1:

- 1.. Any day that the Permittee's 365-day rolling average production level is more than 850 tons of 100% sulfuric acid.

VII. Specific Requirements

No changes due to this modification.

Addendum

The comment period began on September 2, 2003 and ended on October 17, 2003.

No comments were received by the facility, the public or EPA. No changes were made to the original Draft permit.