

Facility Name: **King America Finishing Inc.**
 City: Dover
 County: Screven
 AIRS #: 04-13-251-00008

Application #: TV-13936
 Date SIP Application Received:
 Date Title V Application Received: August 6, 2002
 Date of Draft Permit Amendment:
 Permit Amendment No: 2261-251-0008-V-02-2

Program	Review Engineers	Review Managers
SSPP	Anna Aponte	James Capp
ISMP	Not Applicable	Not Applicable

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft/proposed operating permit amendment. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (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 amendment is to identify state and federal air requirements applicable to the modification/construction to be performed at **King America Finishing Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It initially describes the facility receiving the permit amendment, 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 amendment 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. Existing Permits**

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2261-251-0008-V-02-0	March 11, 2002	X	
2261-251-0008-V-02-1	May 8, 2002	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2261-251-0008-V-02-0	Processed as an Administrative Amendment for Name Change and Change in Ownership.
2261-251-0008-V-02-1	Minor Modification for the addition of a new condition number 8.23.1

B. Regulatory Status

1. PSD/NSR

The facility is considered a major source with respect to PSD rules.

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	X	X		
PM ₁₀	X	X		
SO ₂	X	X		
VOC	X	X		
NO _x	X	X		
CO	X	X		
TRS	X			X
H ₂ S	X			X
Individual HAP	X	X		
Total HAPs	X	X		

Regulatory Analysis

II. Proposed Modification

A. Description of Modification

As requested by EPA Region IV, condition 5.2.1(b) is being modified to clarify the predictive monitoring system on Boiler B002.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	X	0	0
PM ₁₀	X	0	0
SO ₂	X	0	0
VOC	X	0	0
NO _x	X	0	0
CO	X	0	0
TRS	N/A	0	0
H ₂ S	N/A	0	0
Individual HAP	X	0	0
Total HAPs	X	0	0

C. PSD/NSR Applicability

The proposed modification does not trigger PSD/NSR applicability.

III. Facility Wide Requirements

No change to the facility wide requirements is proposed.

IV. Regulated Equipment Requirements

No change to the regulated equipment requirements is proposed.

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

No change to the testing requirements is proposed.

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

No change to the monitoring requirements is proposed.

VII. Other Record Keeping and Reporting Requirements

No change to the record keeping and reporting requirements is proposed.

VIII. Specific Requirements

- A. Operational Flexibility: No change is proposed.
- B. Alternative Requirements: No change is proposed.
- C. Insignificant Activities: No change is proposed.
- D. Temporary Sources: No change is proposed.
- E. Short-Term Activities: No change is proposed.
- F. Compliance Schedule/Progress Reports: No change is proposed.
- G. Emissions Trading: No change is proposed.
- H. Acid Rain Requirements: No change is proposed.
- I. Prevention of Accidental Releases: No change is proposed.
- J. Stratospheric Ozone Protection Requirements: No change is proposed.
- K. Pollution Prevention: No change is proposed.
- L. Specific Conditions

Condition 5.2.1(b) has been modified, as requested by EPA Region IV, to clarify the predictive monitoring system on Boiler B002.

Addendum to Narrative

EPD issued draft Title V Permit 2261-251-0008-V-02-2 for King America Finishing Inc. in Dover, Georgia on August 27, 2002. EPA had until October 11, 2002 to comment on the minor modification. On August 28, 2002 EPA notified EPD that they had no comments on the modification and to issue the permit.