

Facility Name: **C-E Minerals Plant 2**

City: Andersonville

County: Sumter

AIRS #: 04-13-261-00047

Application #: 15240

Date SIP Application Received:

Date Title V Application Received:

Permit No: 3255-261-0047-V-04-1

<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 draft 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 draft permit amendment 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. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

The initial Title V Permit Number 3255-261-0047-V-04-0 was issued on December 19, 2002 based on Application TV-9372. The permit is under appeal. C-E Minerals continued to operate under Air Quality Permit 3295-261-0047-E-03-0 while negotiating a resolution to the appeal. Air Quality Permit 3295-261-0047-E-03-0 was amended on May 29, 2003 to allow for the addition of a new direct kiln feed system (DE) described in Application SIP-13405. Changes in this amendment are primarily for the purposes of incorporating changes to resolve the appeal. A redlined version of the Title V Permit that was issued on December 19, 2002 is attached, showing changes that are part of this amendment.

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
3255-261-0047-V-04-0	December 19, 2002	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3255-261-0047-V-04-0	The initial TV Permit. It has been appealed and is therefore stayed until the appeal is settled. This amendment is to resolve the appeal.

**B. Regulatory Status****1. PSD/NSR/RACT**

Plant 1, Plant 2 and the TSNA Grit Plant are considered to be part of the same site, which is a major source under PSD because its potential emissions of PM, PM-10, NO<sub>x</sub>, and SO<sub>2</sub> are greater than 250 tpy (it is not one of the 28 named source categories under PSD).

## 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	n/a			
H <sub>2</sub> S	n/a			
Individual HAP	n/a			
Total HAPs	n/a			

**II. Proposed Modification**

## A. Description of Modification

This amendment is for the purpose of resolving the appeal of Air Quality Application 3255-261-0047-V-04-0. The amendment incorporates corrections and clarifications that C-E Minerals Company has agreed will sufficiently resolve their objections to the Title V permit so that they will drop their appeal. This amendment also incorporates those items from Air Quality Permit 3295-261-0047-E-03-0, which was amended on May 29, 2003, to allow for the addition of the new direct kiln feed system (DE) described in Application SIP-13405.

## B. Emissions Change

Since the issuance of Permit 3255-261-0047-V-04-0, the direct kiln feed system (DE) was permitted as described in Application SIP-13405. Specifically, the changes include the addition of five screens, two augers, one roll crusher, one bagger, one bucket elevator, one belt feeder and one bin. Air Quality Permit 3295-261-0047-E-03-0 was amended to authorize the new emission units because Air Quality Permit 3255-261-0047-V-04-0 was stayed, pending the outcome of the appeal. Condition 3.3.1 incorporates limits from Condition 33 of Air Quality Permit 3295-261-0047-E-03-0 to assure compliance with the provisions of 40 CFR, Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Plants".

C. PSD/NSR Applicability

Plant 1, Plant 2 and the TSNA Grit Plant are considered to be part of the same site, which is a major source under PSD because its potential emissions of PM, PM-10, NO<sub>x</sub>, and SO<sub>2</sub> are greater than 250 tpy (it is not one of the 28 named source categories under PSD). The potential PM/PM<sub>10</sub> emissions from amendment made to the original title V permit were estimated as 1.45 tons/yr, which was less than the 15 ton/yr PSD trigger value for PM<sub>10</sub>. Therefore, a PSD review was not required at that time.

**III. Facility Wide Requirements**

The issues resulting in the appeal did not involve any facility wide requirement contained in Part 2.0 of the permit.

**IV. Regulated Equipment Requirements**

A. Brief Process Description

The operation of a kaolin and bauxitic clay processing facility and associated air pollution control equipment. The overall facility/process description in Section 1.3 has been corrected by adding a comma between kaolin and bauxitic clays.

B. Equipment List for the Process

Table 3.1 has not been updated. The new equipment permitted under permit No. 3295-261-0047-E-03-0 are already group under sources in Table 3.1.

C. Equipment & Rule Applicability

**Emission and Operating Caps –**

No changes are made to emission units and/or operating caps.

**Applicable Rules and Regulations -**

No changes are made to applicable rules and regulations

D. Compliance Status

No compliance issues were reported by the facility.

E. Operational Flexibility

The issues resulting in the appeal did not involve operational flexibility issues.

F. Permit Conditions

1. Condition 5.2.1 has been modified by correcting the control device ID for Cage Mill CM2.
2. Condition 5.2.3 has been modified by adding “if necessary to assure compliance” to clarify when the Division would change the Preventative Maintenance Program.
3. Condition 5.2.9 has been amended to assure sufficient time (i.e., 120 days) to implement all new monitoring requirements.
4. Condition 6.1.7 has been amended by changing the “eight” to “twelve” in Sections c.viii., and c.ix. and to correct a typographical error in Section d.i.
5. Correction is made to a typographical error on Condition 6.2.8.
6. Condition 4.2.1 was added to assure NSPS tests requirements are met for the new equipment installed as part of permit 3295-261-0047-E-03-0 amended on May 29, 2003.

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

Condition 4.2.1 has been added to require emission testing of the sources added under permit amendment dated May 29, 2003, which was issued to allow for the addition of the new direct kiln feed system (DE) described in Application SIP-13405.

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

Specific monitoring, record keeping and reporting requirements for each condition that has been amended are discussed as follows:

See Section IV F. of this narrative for changes to monitoring requirements.

Further clarification is necessary regarding the trigger values. Concerns have been raised regarding how the VE checks should be performed that would result in VE measurements less than 5% opacity. The permit states that “the determination shall cover a period of three minutes.” However, the permit does not explicitly state how a trained observer would actually determine if the VE is below the opacity action level, and there is more than one acceptable method. For example, the VE determination could include a VE reading every 15 seconds for a duration of 3-minute. The twelve readings would then be averaged and this average value would be used to show if action is necessary, based on the opacity action level.

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

1. Plant wide

No changes have been made affecting section six of the permit.

2. Individual Equipment

No changes have been made affecting section six of the permit.

3. Equipment Groups

No changes have been made affecting section six of the permit.

**VIII. Specific Requirements**

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

This amendment does not address or alter any operational flexibility.

B. Alternative Requirements

This amendment does not address or alter any alternative requirements.

C. Insignificant Activities

This amendment does not address or alter any insignificant activities.

D. Temporary Sources

This amendment does not address or alter any temporary sources.

E. Short-Term Activities

This amendment does not address or alter any short-term activities.

F. Compliance Schedule/Progress Reports

Section 13.00 contained in Application 9372 was signed. The certification shows that the facility believed itself to be in compliance with all applicable requirements as of the date of the certification and will continue to comply with such requirements.

G. Emissions Trading

This amendment does not address or alter any emissions trading.

H. Acid Rain Requirements

This amendment does not address or alter any acid rain requirements.

I. Prevention of Accidental Releases

This amendment does not address or alter any prevention of accidental release equipment.

J. Stratospheric Ozone Protection Requirements

This amendment does not address or alter any stratospheric ozone protection requirements.

K. Pollution Prevention

This amendment does not address or alter any pollution prevention.

L. Specific Conditions

This amendment does not add any new conditions.

**Addendum to Narrative**

EPD issued draft Title V Permit 3255-261-0047-V-04-1 for C-E Minerals Plant 1 in Andersonville, Georgia on August 11, 2004. The public notice for this permit was published in The Americus Time Recorder on August 24, 2004. The public comment period expired September 24, 2004. No comments were received.