

Facility Name: **C-E Minerals, Inc. – Plant 2**

City: Andersonville

County: Sumter

AIRS #: 04-13-261-00047

Application #: 15449

Date SIP Application Received: June 29, 2004

Date Title V Application Received: June 29, 2004

Permit No: 3255-261-0047-V-04-2

Program	Review Engineers	Review Managers
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TOXICS	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 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 public comment period 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
3255-261-0047-V-04-0	December 19, 2002	✓	
3255-261-0047-V-04-1	October 20, 2004		✓

Table 2: Comments on Specific Permits

Permit Number	Comments
3255-261-0047-V-04-0	Initial Title V permit

B. Regulatory Status

1. PSD/NSR/RACT

Plant 1, Plant 2 and Plant 6 are considered to be part of the same site, which is a major source under PSD because its potential emissions of PM, PM₁₀, NO_x, and SO₂ are greater than 250 tpy (it is not one of the 28 named source categories under PSD). Plant 2 was issued a PSD permit in October 1980. Plant 2 has taken several PSD avoidance limits on new and existing emission units (see narrative for Plant 2 initial TV permit, No. TV-9372). In the permit issued March 6, 1990, the facility took limits on operating hours for the Barmac Crushers (BC13 and IC40) and the casting system (IC43) to avoid PSD review. The BC13 Barmac Crusher has been limited to 2,000 hours of operation during any twelve consecutive months. The IC40 Barmac Crusher and Casting System (IC43) had been each limited to 5,200 hours of operation during any twelve consecutive months.

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	✓		
CO	Yes			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	n/a			
Total HAPs	n/a			

II. Proposed Modification

A. Description of Modification

The facility is requesting the removal of the PSD avoidance limit for the Barmac Crushers (BC13 and IC40) and the casting system (IC43). The BC13 Barmac Crusher has been limited to 2,000 hours of operation during any twelve consecutive months. The IC40 Barmac Crusher and Casting System (IC43) had been each limited to 5,200 hours of operation during any twelve consecutive months. The facility submitted a PSD application for the above emission unit that includes the required modeling and a BACT analyses. Condition No. 3.2.2 (limits the hours of operation for BC13, IC40, and IC43) will be modified to delete the references to Source Codes BC13, IC43, and IC40 and the limits for these emission units. Condition Nos. 6.1.7 and 6.2.3 will be similarly modified. Condition 3.2.6 is added to limit PM emissions for Codes BC13, IC43, and IC40.

Emissions Change

Table 4: Emissions Change Due to Modification – Plant 2

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease)¹ (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	5.12	20.02
PM ₁₀	Yes	5.12	20.02
SO ₂	No		
VOC	No		
NO _x	No		
CO	No		
TRS	No		
H ₂ S	No		
Individual HAP	No		
Total HAPs	No		

¹ Actual emissions based on test data dated 3/90, 8/96 and 8/90

B. PSD/NSR Applicability

This modification is classified as a major modification per PSD which includes emissions from the changes at Plant 1. Please see the Preliminary Determination for Application No. 15449.

III. Facility Wide Requirements

The removal of the PSD avoidance limit for the Barmac Crushers (BC13 and IC40) and the casting system (IC43) does 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 kaolin processing facility and associated air pollution control equipment.

C. Equipment List for the Process

Table 3.1 has been updated by removing Barmac Crushers (BC13 and IC40) and the casting system (IC43) from conditions 3.2.2, 6.1.7 and 6.2.3 and adding condition 3.2.6 to limit PM emissions from Barmac Crushers (BC13 and IC40) and the casting system (IC43). The emission units are now shown to be subject to 40 CFR 52.21 PSD.

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
BC13	Barmac Crusher	40 CFR Part 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 52.21 PSD	2.2.1, 3.2.6, 3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.9, 6.1.4, 6.2.1, 6.2.2	BH13	Baghouse
IC40	Barmac Crusher	40 CFR Part 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 52.21 PSD	2.2.1, 3.2.6, 3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.9, 6.1.4, 6.2.1, 6.2.2	BH40	Baghouse
IC43	Casting System	40 CFR Part 60 Subpart OOO 391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 52.21 PSD	2.2.1, 3.2.6, 3.3.1, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.9, 6.1.4, 6.2.1, 6.2.2	BH43	Baghouse

C. Equipment & Rule Applicability

Please see Section 3.0 of the Preliminary Determination.

D. Compliance Status

The facility has not indicated any compliance problems.

E. Operational Flexibility

The facility has not indicated any need for additional operational flexibility.

F. Permit Conditions

Condition No. 3.2.2 (limits the hours of operation for BC13, IC40, and IC43) will be modified to delete the references to Source Codes BC13, IC43, and IC40 and the limits for these emission

units. Condition Nos. 6.1.7 and 6.2.3 will be similarly modified. Condition 3.2.6 is added to limit PM emissions for Codes BC13, IC43, and IC40.

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

No additional testing requirements are associated with this modification.

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

No additional monitoring conditions are associated with this modification.

VII. Other Record Keeping and Reporting Requirements

No additional Record Keeping and Reporting Requirements are associated with this modification

VIII. Specific Requirements

No additional Requirements are associated with this modification.

Addendum to Narrative

The 30-day public review started on January 7, 2005 and ended on February 7, 2005. The Division did not receive comments.