

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

City: Andersonville

County: Sumter

AIRS #: 04-13-261-00047

Application #: TV-15972

Date Title V Application Received: January 19, 2005

Permit No: 3255-261-0047-V-04-4

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	July 16, 2002	✓	
3255-261-0047-V-04-1	October 20, 2004	✓	
3255-261-0047-V-04-2	PSD Going through a 30 day public participation	✓	
3255-261-0047-V-04-3	January 19, 2005	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
3255-261-0047-V-04-0	Initial Title V Operating permit
3255-261-0047-V-04-1	Permit Amendment to resolve appeal of initial Title V operating permit
3255-261-0047-V-04-2	Retro-active PSD permit amendment for relaxation of PSD avoidance limits on Emission Unit BC13, IC40, and IC43
3255-261-0047-V-04-3	Section 502(b)(10) Change for additional process equipment and the use of silane solution

B. Regulatory Status**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 December 1995 and amended in September 1997, the facility took emission limits and limits on operating hours for Jaw Crusher (Emission Unit ID No. I10), Barmac Crushing Circuit (Emission Unit ID No. I12) and Sizing and Bagging Operation (Emission Unit ID No. I13) to avoid PSD review. In the permit issued July 1996 and amended in September 1997, the facility took emission limits and limits on operating hours for Rotary Dryer (Emission Unit ID No. BD2) and Loading Chute (Emission Unit ID No. BD5) to avoid PSD review.

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	No			
H ₂ S	No			
Individual HAP	Yes			✓
Total HAPs	Yes	✓		

II. Proposed Modification

A. Description of Modification

The facility has submitted an application requesting the removal of limits on the hours of operation for the emission units in the IC Plant (Emission Unit ID Nos. I10, I12, and I13), the Building 4 Rotary Dryer (Emission Unit ID No. BD2), and Loading Chute (Emission Unit ID No. BD5) and increase PM emissions for Barmac Crushing Circuit (Emission Unit ID Nos. I12) from 0.40 lb/hr to 1.0 lb/hr as specified in Condition No. 3.2.2. The hours of operation limits are not necessary with the lower emission rate limits established in September of 1997.

Condition No. 3.2.2 will be modified to delete the hours of operation limits for Emission Unit ID Nos. I10, I12, I13, BD2 and BD5 and increase PM emissions for Emission Unit ID No. I12. Condition Nos. 6.1.7 and 6.2.3 will be modified accordingly. Condition 4.2.2 has been added for testing of the above emission units to verify compliance with Condition 3.2.2 PM limits. The remaining particulate matter emission limits for Emission Unit ID Nos. I10, I12, I13, BD2 and BD5 are sufficient for PSD avoidance.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Actual Emissions Increase (Decrease) (tpy)	Potential Emissions Increase (Decrease) (tpy)
PM	Yes	7.49	12.12
PM ₁₀	Yes	7.49	12.12
SO ₂	Yes	0.026	0.057
VOC	Yes	0.24	0.52
NO _x	Yes	4.41	9.59
CO	Yes	3.70	8.05
TRS	No	N/A	N/A
H ₂ S	No	N/A	N/A
Individual HAP ¹	Yes	0.0032	0.007
Total HAPs	Yes	0.0032	0.007

C. PSD/NSR Applicability

The following is a permitting chorology, which provides how PSD and NSPS requirements have been applied by EPD for the emission units in the IC Plant (Emission Unit ID Nos. I10, I12, and I13), the Building 4 Rotary Dryer (Emission Unit ID No. BD2), and Loading Chute (Emission Unit ID No. BD5):

December 4, 1995, Permit 3295-129-10420 was amended to allow the installation of the following equipment subject to NSPS Subpart OOO:

- Loadout (ICTL) controlled by baghouse (B244)
- Jaw Crusher (I10) controlled by baghouse (I11)

- Barmac Crushing Circuit (I12) controlled by baghouse (B12)
- Sizing and Bagging (I13) controlled by baghouse (B13)

The NSPS Subpart OOO limit, 1.02 lb/hr limit on I10, 2.57 lb/hr limit on I12 and I13, and a limit of 3000 hrs/yr ensures this project is not a major PSD modification. The project will result in potential emissions of 13.8 tons/yr of PM/PM₁₀, which is less than the PSD trigger value of 15 tons/yr of PM₁₀. Hence, this project is not a major PSD modification.

July 1, 1996, Permit 3295-129-10420 was amended to allow the installation of the following equipment:

- Rotary Dryer (BD2) controlled by baghouse (BD3)
- Loading Chute Rotary Dryer System (BD5) controlled by baghouse (BD7)
- Loading Rotary Dryer System (BD8) controlled by baghouse (BD7)

The Rotary Dryer is subject to NSPS Subpart UUU. All other systems are subject to NSPS Subpart OOO. The NSPS limits, a 1,200 hrs/yr limit on the Rotary Dryer, and fuel usage limit (natural gas, propane, or # 2 oil) ensured the July 1, 1996 PSD Avoidance Project 8385 (BD2, BD5, & BD8) was not a major PSD modification. This project was determined to have the potential to emit 14.2 tons/yr PM/PM₁₀, 18.3 tons/yr SO₂, 5.14 tons/yr NO_x, 1.29 tons/yr CO, and 0.08 tons/yr VOC. A PSD review would be required if the trigger values were exceeded (15 tons/yr PM₁₀, 40 tons/yr SO₂, 40 tons/yr NO_x, 100 tons/yr CO, or 40 tons/yr VOC). The July 1, 1996 PSD Avoidance Project 8385 (BD2, BD5, and BD8) was later revised by permit amendments issued on February 6, 1997 and September 18, 1997.

February 6, 1997, Permit 3295-129-10420 was amended to allow for additional operational flexibility. July 1, 1996 PSD Avoidance Project 8385 (BD2, BD5, & BD8) was revisited and new limits were set that provided more operational flexibility while ensuring the project was not a PSD major modification. The permit limited the Dryer (BD2) to 5,500 hrs/yr of total operation with a limit of 1,200 hrs/yr of operation while firing #2 oil. The loading chute (BD5) was limited to 1,000 hrs/yr. The Rotary Dryer is subject to NSPS Subpart UUU and limited to burn natural gas, propane or #2 oil. All other systems are subject to NSPS Subpart OOO. The NSPS limits and operational limits were set to ensure this project was not a major PSD modification. This project was determined to have the potential to emit 14.8 tons/yr PM/PM₁₀, 18.3 tons/yr SO₂, 23.2 tons/yr NO_x, 5.8 tons/yr CO, and 0.83 tons/yr VOC. A PSD review would be required if the trigger values were exceeded (15 tons/yr PM₁₀, 40 tons/yr SO₂, 40 tons/yr NO_x, 100 tons/yr CO, or 40 tons/yr VOC). The July 1, 1996 PSD Avoidance Project 8385 (BD2, BD5, and BD8) was later revised by permit amendment issued September 18, 1997.

September 18, 1997, Permit 3295-261-0047-E-01-0 was issued to allow for operation of pre-existing equipment installed at the site prior to 1972 as follows:

The permit provided additional operational flexibility by revising the December 4, 1995 PSD Avoidance Project (ICTL, I10, I12, and I13). The limit for the hours of operation on the Barmac Crushing Circuit (I12) controlled by baghouse B12 was changed from 3000 to 5500. The limit on hours of operation was offset by a lower PM emission limit (0.40 lb/hr). The limit for the hours of operation on the Sizing and Bagging (I13) controlled by baghouse B13 was changed from 3000 to 5500. Again, the limit on hours of operation was offset by a lower PM emission limit (0.30 lb/hr). The limit on the hours of operation and PM emissions will ensure this project is not a major PSD modification. The project will result in potential emissions of 7.96 tons/yr of PM/PM₁₀, which is less than the PSD trigger value of 15 tons/yr of PM₁₀. Hence, this project is not a major PSD modification. The July 1, 1996 PSD Avoidance Project 8385 (BD2, BD5, & BD8) was revisited again and new limits were set that provided more operational flexibility while ensuring the project was not a PSD major modification. As requested in the application, the permit established limits on the Dryer (BD2), which included a 2.45 lb/hr emission

limit, a limit on fuel usage (natural gas, propane, or #2 oil), a 5,500 hrs/yr of total Dryer operation limit and a 1,200 hrs/yr of Dryer operation limit while firing #2 oil. As requested in the application, the permit established limits on the loading chute (BD5), which included a 0.86 lb/hr emission limit and a 5,500 hrs/yr operational limit. The operational limit for the loading chute (BD5) increased from 1,000 hrs/yr to 5,500 hrs/yr, which was allowed by lowering the emission limits from NSPS levels to 2.45 lb/hr for the Dryer and 0.86 lb/hr for the loading chute. This project was determined to have the potential to emit 12.22 tons/yr PM/PM₁₀, 18.3 tons/yr SO₂, 23.2 tons/yr NO_x, 5.8 tons/yr CO, and 0.83 tons/yr VOC. A PSD review would be required if the trigger values were exceeded (15 tons/yr PM₁₀, 40 tons/yr SO₂, 40 tons/yr NO_x, 100 tons/yr CO, or 40 tons/yr VOC). Table 5 shows the operational and emission limits for these projects as permitted in September 1997:

Table 5 Emission limits for Projects Nos. 1 and 2 as Permitted in September 1997

Project Number	Emission Unit ID No.	Emission Unit Description	Operational Limit (hours/year)	PM Emission Rate (lbs/hr)	PM Emissions (tpy)
1	I10	Jaw Crusher	3,000	1.02	1.53
	I12	Barmac Crushing Circuit	5,500	0.40	1.10
	I13	Sizing and Bagging	5,500	0.30	0.81
	ICTL	Building 5 Loadout	8,760	1.03	4.51
Total Emissions of Project				2.75	7.95
2	BD2	Rotary Dryer	5,500	2.45	6.74
	BD5	Loading Chute	5,500	0.86	2.36
Total Emissions of Project				3.31	9.10

The rescinding of the operational restrictions on the hours of operation for Emission Unit ID Nos. I10, I12, I13, BD2, and BD5 and increasing PM emissions for Barmac Crushing Circuit (Emission Unit ID Nos. I12) from 0.40 lb/hr to 1.0 lb/hr will not trigger a retro-active PSD review. With the removal of these restrictions on the hours of operation the above emission units will be able to operate 8,760 hours per year and the potential particulate matter (PM) / PM₁₀ emissions from each project will be below 15 tons per year (tpy) as shown in Table 6:

Table 6 Potential Particulate Matter Emissions from Projects Nos. 1 and 2

Project Number	Emission Unit ID No.	Emission Unit Description	PM Emission Rate (lbs/hr)	PM Emissions (tpy)
1	I10	Jaw Crusher	1.02	4.47
	I12	Barmac Crushing Circuit	1.00	4.38
	I13	Sizing and Bagging	0.30	1.31
	ICTL ¹	Building 5 Loadout	1.03	4.51
Total Emissions of Project			3.35	14.67
2	BD2	Rotary Dryer	2.45	10.73
	BD5 ²	Loading Chute	0.86	3.77
Total Emissions of Project			3.31	14.5

1 Emission Unit ICTL was permitted with Project No. 1 but never had a restriction on the hours of operation. The mass emission rate is based upon NSPS Subpart OOO limit of 0.02 gr/dscf.

2 Emission Unit ID No. BD8 (Dust Loading Area) vents through the same baghouse as Emission Unit BD5 (Baghouse BD7), therefore, the emissions from BD8 are included in the emissions from BD5.

NO_x, CO, SO₂ and VOC emissions from natural gas combustion has been evaluated and found to be below the PSD threshold limits. This permit retains the hours of operation restriction of fuel oil for the Rotary Dryer (Emission Unit ID No. BD2) as stated in Condition 3.2.3 of the Title V permit.

This significant Title V modification will rescind the operational limitations for Emission Unit ID Nos. I10, I12, I13, BD2, and BD5 and allow PM emissions increase for Barmac Crushing Circuit (Emission Unit ID Nos. I12) from 0.40 lb/hr to 1.0 lb/hr so that each of the specified emission units can operate 8,760 hours per year. Rescinding these operational limitations and increasing PM emissions for Barmac Crushing Circuit (Emission Unit ID Nos. I12) from 0.40 lb/hr to 1.0 lb/hr will not cause the two projects to be considered major modification with respect to PSD as detailed in Section II.C. of this narrative.

III. Facility Wide Requirements

A. Emission and Operating Caps:

The removal of the PSD avoidance limit for Emission Unit ID Nos. I10, I12, I13, BD2, and BD5 and increasing PM emissions for Barmac Crushing Circuit (Emission Unit ID Nos. I12) from 0.40 lb/hr to 1.0 lb/hr does not involve any facility wide requirement contained in Part 2.0 of the permit.

IV. Regulated Equipment Requirements

A. Brief Process Description

Building 4 (Emission Units BD2, BD5, and BD8)

This part of Plant 2 involves the drying of product. The material is sent from the Feed Hopper (Emission Unit ID No. BD1) via a conveyor to the Rotary Dryer (Emission Unit ID No. BD2). The dried material will be conveyed to the loading chute (Emission Unit ID No. BD5) or to another belt conveyor and then to the Dust Loading area (Emission Unit ID No. BD8). The PM emissions from the Loading Chute and the Dust Loading area are controlled by Baghouse BD7 and the PM emissions from the Rotary dryer are controlled by Baghouse BD3.

IC Plant (Emission Units I10, I12, I13, and ICTL)

Material is received via rail car at the rail car unloading area and processed through the Jaw Crusher (Emission Unit ID No. I10). From the jaw crusher the material is sent the Loading System (Emission Unit ID No. ICTL). The material is further processed in the Barmac Crushing Circuit (Emission Unit ID No. I12) and then sent to the sizing and bagging Operations (Emission Unit ID No. I13). The loadout area (ICTL) is vented inside the IC process building (designated as Building 5). The jaw crusher (I10), Barmac Crushing Circuit (I12), and Sizing and Bagging operations (I13) are each controlled by a baghouse designated as I11, B12, and B13, respectively.

TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
I10	Jaw Crusher	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO 40 CFR 52 part 52.21	2.2.1, 3.2.2, 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, 6.1.7, 6.2.1, 6.2.2	I11	Baghouse
I12	Barmac Crushing Circuit	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO 40 CFR 52 part 52.21	2.2.1, 3.2.2, 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, 6.1.7, 6.2.1, 6.2.2	B12	Baghouse
I13	Sizing and Bagging	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO 40 CFR 52 part 52.21	2.2.1, 3.2.2, 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, 6.1.7, 6.2.1, 6.2.2	B13	Baghouse
BD2	Rotary Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 391-3-1-.02(2)(g) 40 CFR 60 Subpart UUU 40 CFR 52 part 52.21	2.2.1, 3.2.2, 3.2.3, 3.2.4, 3.3.2, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.9, 6.1.4, 6.1.7, 6.2.1, 6.2.2	BD3	Baghouse
BD5	Loading Chute	391-3-1-.02(2)(b) 391-3-1-.02(2)(p) 40 CFR 60 Subpart OOO 40 CFR 52 part 52.21	2.2.1, 3.2.2, 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, 6.1.7, 6.2.1, 6.2.2	BD7	Baghouse

C. Equipment & Rule Applicability

Emission and Operating Caps :

The current permit has the following emission and operating limits for Emission Unit ID Nos. I10, I12, I13, BD2, and BD5.

Source Code	Emission Units	Control Device (Source Code)	Stack	PM Emission Rate Not To Exceed (lbs/hr)	Hours of Operation Not To Exceed during any 12 Consecutive Months (hours)
I10	Jaw Crusher	Baghouse I11	30	1.02	3,000
I12	Barmac Crushing Circuit	Baghouse B12	27	1.00	5,500
I13	Sizing and Bagging	Baghouse B13	26	0.30	5,500
BD2	Rotary Dryer	Baghouse BD3	28	2.45	5,500
BD5	Loading Chute	Baghouse BD7	29	0.86	5,500

Applicable Rules and Regulations :

State Rules

The emission units associated with this modification are subject to the following Georgia regulations:

- 391-3-1-.02(2)(b) “Visible Emissions
- 391-3-1-.02(2)(g) “Sulfur Dioxide”
- 391-3-1-.02(2)(p) “Particulate Emissions from Kaolin and Fuller’s Earth Processes”

Georgia Rule (b)

Emission Units I10, I12, I13, BD2, and BD5 are subject to Georgia Rule 391-3-1-.02(2)(b) “Visible Emissions” which limits the opacity of the emissions from these units to below 40 percent. Rescinding these limits on the hours of operation for Emission Units I10, I12, I13, BD2, and BD5 will not change these Emission Unit’s applicability to Rule (b) or cause these emission units to be non-compliant with Georgia Rule (b). The use of properly operated baghouses ensures compliance with Rule (b).

Rule (g) “Sulfur Dioxide”

Emission Unit BD2 is subject to Georgia Rule 391-3-1-.02(2)(g) “Sulfur Dioxide” which limits the sulfur content of any fuel burned in BD2 to below 2.5 percent, by weight, since the heat input of the unit is below 100 mmbtu/hr. Rescinding the limit on the hours of operation for Emission Units BD2 will not change this Emission Unit’s applicability to Rule (g) or cause this emission unit to be non-compliant with Rule (g). The use of distillate oil ensures compliance with Rule (g).

Rule (p) “Particulate Emissions from Kaolin and Fuller’s Earth Processes”

Emission Units I10, I12, I13, BD2, and BD5 are subject to Georgia Rule 391-3-1-.02(2)(p) “Particulate Emissions from Kaolin and Fuller’s Earth Processes” which limits PM emissions from these units to below the following equations:

$$E = 4.1P^{0.67}, \text{ for process input rate of 30 tph each}$$

$$E = 55P^{0.11} - 40, \text{ for process input rate above 30 tph each}$$

Where,

E = allowable emission rate in pounds per hour

P = process input weight rate in tons per hour

Rescinding these limits on the hours of operation for Emission Units I10, I12, I13, BD2, and BD5 will not change these Emission Unit’s applicability to Rule (p) or cause these emission units to be non-compliant with Rule (p). The use of properly operated baghouses ensures compliance with Rule (p).

Federal Regulations

The emission units associated with this modification are associated with subject to the following Federal regulations:

- 40 CFR Part 60 Subpart OOO “Nonmetallic Mineral Processing Plants”
- 40 CFR Part 60 Subpart UUU “Calciners and Dryers in Mineral Industries”

NSPS Subpart UUU

Emission Unit BD2 (Rotary Dryer) is subject to 40 CFR 60, subpart UUU, NSPS for Calciners and Dryers in Mineral Industries. This standard limits the PM emissions from the dryer to below 0.025 gr/dscf and opacity of the emissions is limited to no more than 10 percent.

Rescinding the limit on the hours of operation for Emission Unit BD2 will not change this Emission Unit’s applicability to NSPS Subpart UUU or cause this emission unit to be non-compliant with NSPS Subpart UUU. The use of properly operated baghouses ensures compliance with NSPS Subpart UUU.

NSPS Subpart OOO

Emission Units BD5, I10, I12, and I13 are subject to 40 CFR 60, subpart OOO, NSPS for Nonmetallic Mineral Processing Plants. This standard limits the PM emissions from these emission units to below 0.022 gr/dscf and opacity of the emissions is limited to no more than 7 percent.

Rescinding these limits on the hours of operation for these emission units will not change these emission unit’s applicability to NSPS Subpart OOO or cause these emission units to be non-compliant with NSPS Subpart OOO. The use of baghouses ensures compliance with NSPS Subpart OOO.

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 and PM emissions for Emission Units I10, I12, I13, BD2, and BD5) will be modified to delete the references to operating hour limits for Emission Units I10, I12, I13, BD2, and BD5 and allow an increase of PM emissions for Emission Units I12. Condition Nos. 6.1.7 and 6.2.3 will be similarly modified. Condition 4.2.2 has been added to require testing.

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

The Barmac Crushing system (I12) was tested in August 2002. In that test, the PM emissions were 0.8478 lb/hr (212% of the current PSD avoidance limit). A condition for retesting the Barmac Crushing system (I12) to demonstrate compliance with the PSD avoidance limit is added. Additionally testing is required for the baghouses serving the Jaw Crusher (I10), Sizing and Bagging (I13), Rotary Dryer (BD2) and Loading Chute (BD5) to further verify that the restricted PM limits will be met and the baghouses are properly maintained.

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

All emission limits remain the same. Hence, the monitoring has not been change.

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7 has been updated to remove reporting requirements associated with tracking hours of operation for Emission Units I10, I12, I13, BD2, and BD5.

VIII. Specific Requirements

Condition 6.2.3 has been updated to remove record keeping requirements used to track hours of operation for Emission Units I10, I12, I13, BD2, and BD5.

Addendum to Narrative

The 30-day public review started on March 18, 2005 and ended on April 17, 2005. Comments were received from C. E. Minerals on April 11, 2005 regarding the performance testing required in Condition No. 4.2.2 for the baghouses serving the Jaw Crusher (I10), Barmac Crushing Circuit (I12), Sizing and Bagging (I13), Rotary Dryer (BD2) and Loading Chute (BD5).

C. E. Minerals believes that since Jaw Crusher (I10), Rotary Dryer (BD2) and Loading Chute (BD5) were tested in 1998 and 1999 additional performance tests are burdensome and unnecessary and requested that Condition 4.2.2 be modified to remove the above mentioned sources.

The Division believes the required testing is appropriate for the sources mentioned above because of the restrictive PM limits set for PSD avoidance and past test results. Hence, no changes are made to the permit.