Facility Name: **Waverly Minerals, Inc.**
City: Meigs
County: Thomas
AIRS #: 04-13-275-00002

Application #: TV-13122, TV-13888 and TV-15664
Date Applications Received: July 24, 2001, July 11, 2002, July 29, 2002 and October 4, 2004, November 10, 2004 respectively, with additional information received on October 6, 2005, November 8, 2005 and February 1, 2006 (TV-15664 updates)

Permit No: 3295-275-0002-V-04-0

Program	Review Engineers	Review Managers
SSPP	S. Ganapathy	Richard McDonald
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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 attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Waverly Minerals, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, 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 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. Facility Identification

1. Facility Name:Waverly Minerals, Inc.

2. Parent/Holding Company Name

MFM Industries, Inc.

3. Previous and/or Other Name(s)

Prior to this Permit being issued the facility's name was Waverly Mineral Products, Inc. The facility notified the Division of a name and ownership change effective December 17, 1999 to Süd Chemie Inc. On January 29 2005 the facility underwent another ownership change from Süd Chemie Adsorbents Inc. to MFM Industries, Inc. The name of the facility also changed from Süd Chemie Inc. to Waverly Minerals Inc.

4. Facility Location

31670 Georgia Highway 3 South
Meigs, Georgia 31765 (Thomas County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

6. Class I Area Impacts

The facility is located within 200 km of St. Marks, and Okefenokee Class I areas.

B. Site Determination

There are no site determination issues; this facility constitutes a single part 70 site.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6 of the Title V application, current permits and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3295-275-0002-V-03-0	April 3, 2000	Initial Title V Permit for the Meigs facility
3295-275-0002-V-03-0	June 3, 2002	Off Permit Change involving Moving of Truck Bin H-5 and adding a conveyor by pass to H-5.

D. Process Description

1. SIC Codes(s): 3295 (Minerals and Earths, Ground or Otherwise Treated)

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The primary products of this facility are oil/grease absorbents and cat litter absorbents.

3. Overall Facility Process Description

Crude fuller's earth clay is extracted from one or more open pit mines located 3 to 4 miles from the processing plant. The clay is loaded with hydraulic excavators into dump trucks and hauled to the processing plant. The clay is stockpiled outdoors according to grades and awaits its first, or primary, crushing.

Upon demand, the crude clay is loaded into a primary crusher with a front-end wheel loader. As the crude clay passes through the primary crusher it is conveyed to a covered storage shed and stored for drying.

The low temperature drying process begins with the clay being loaded into secondary crushers with a front-end wheel loader for further size reduction. A portion of the crushed clay is dried in a fluid bed dryer, the remainder being dried in a rotary dryer.

Once the clay is dried, it enters the screening, milling and fine grinding phase for final sizing. Before going to finished product storage bins, a portion of the sized product is conveyed to a high temperature dryer where it receives additional drying. The remainder of sized product goes directly to finished product storage bins for packaging.

The finished products are packaged as oil and grease absorbents, cat litter and bleaching earth. They are shipped to market by highway and rail transportation.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This facility is a major source under the 40 CFR 52.21 Prevention of Significant Deterioration (PSD) because its potential emissions of PM and SO_2 are greater than 250 tpy (it is not one of the 28 named source categories under PSD). The facility has not had a PSD review. The facility permit has PSD avoidance condition for the operation of Mill D-16. Actual emission of SO_2 from the facility is less than 50 tpy.

2. Title V Major Source Status by Pollutant

Table 2: 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_{10}	✓	✓		
SO_2	✓	✓		
VOC	✓			✓
NO_x	✓			✓
CO	✓			✓
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

No MACT standards apply to this facility.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

The permit has no specific facility-wide permit condition other than the General Provisions (Subpart A) of 40 CFR 60 for sources subject to NSPS.

C. Compliance Status

The facility has certified compliance in its permit application.

D. Operational Flexibility

None applicable.

E. Permit Conditions

Condition 2.2.1 states that Subpart A applies to all sources subject to a specific NSPS. Condition 2.3.1 in the facility's existing permit has been moved to Section 8 of the permit as Condition 8.17.2 in the renewed permit.

III. Regulated Equipment Requirements

A. Brief Process Description

Equipment at the facility is used to process mined Fuller's earth to crush, mill, grind and produce different varieties of cat litter absorbent and other oil and grease absorbents.

B. Equipment List for the Process

Section 3.1 of the permit has table with equipment list, applicable limits and standards, permit condition numbers and air pollution control device information. Please refer to this table. The renewal permit includes addition of a Bin vent (B-6) to the existing truck bin (H-5) and a new conveyor, which were added in 2002. The permit application update also indicated that during the change of ownership in January 2005, Mill (D-18), Baghouse 9 (F-13), Baghouse 10 (D-20), Multicyclone (D-19), Conveyor (D-22), Sealer (G-10) and Pug Mill (B-3) were removed from the facility and is also removed from the emission inventory table in Section 3.1 in the new permit. Most of the emission units exhausting to the removed baghouses and multicyclone are no longer in use at the facility, but are still at the facility. The Permittee has informed the Division that upon reactivation of any of the inactive sources, PM emissions from these sources will be controlled by Bin Vents.

The renewal permit shows these sources as existing sources being controlled by Bin vents (ie. BV-12, BV-16, BV-19, BV-24, BV-25, BV-9 and BV-11. The source IDs are assigned by EPD for these new Bin Vents that will be installed before the emission units are recommissioned. A footnote is added to the emission inventory table in Section 3.1 of the permit to show that the bin vents must be installed prior to reactivating these emission units. The control efficiency of the Bin vents is expected to be close to that of the replaced baghouses and should be higher than that of the replaced multiclones.

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 3295-275-0002-V-03-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. The renewal permit includes Bin Vent (H-6), which controls PM emission from Truck Bin (H-5) and addition of a new bypass conveyor in 2002, which was subsequently removed. Thus, no new regulations or rules apply to the facility. PM emissions from the Truck Bin (H-5) is reduced by more than 95% due installation of Bin Vent (H-6). Thus this draft permit does not have any new equipment other than the Bin Vent (H-6). PSD is not applicable since there is no increase in emissions of any pollutant. There is no change in the NSPS applicability to sources at the facility.

Emission and Operating Caps:

Mills D-16 and D-18 in the facility's current permit are each limited to 4,300 hours of operation during any consecutive twelve-month period. This requirement was necessary to avoid a PSD review of two air quality permit applications submitted in 1998. In Title V Renewal permit application update of September 27, 2005 the Permittee requested that that Mill D-16 be allowed to operate for 6000 hours per year since Mill D-18 has been removed from the facility. The renewed permit has the PSD avoidance operational limit of 6000 hours for Mill D-16. PM emission due to this change in hours of Mill D-16 is lower than the currently permitted levels of PM emissions for Mills D-16 and D-18. The PTE for the 1998 PSD avoidance project consisted of increased PTE for PM of 14.7 tpy for 4300 hours of operation for Mills D-16 and D-18. In the renewal permit Mill D-18 has been removed from the facility and the operational hours for Mill D-16 is increased to 6000 hours/year. The increase in PTE for PM is only 12.8 tpy for operation of Mill D-16 under the proposed operating scenario. Thus, there is a reduction in PTE for PM of 1.9 tpy for the operation of Mill D-16 under the proposed operating plan.

Rules and Regulations Assessment:

Rule and Regulations Assessment are discussed in the initial Title V permit narrative of Permit No. 3295-275-0002-V-03-0 (current permit). Please refer to this narrative.

D. Compliance Status

Form F.2 of the renewal permit application certifies compliance with all applicable rules, regulation and limits. Review of the compliance files for this facility indicated that the facility was found to be out of compliance with Condition 5.3.1, 8.17.1, and 8.22.2 of the permit. A consent order was executed in March 2006 to address these violations.

The executed consent order acknowledged that the Permittee has taken steps to resolve all compliance issues and has instituted steps to prevent recurrence of problems cited in the Notice of Violation issued by the Division. The Division determined that excursion on Scrubbers #1 and #2 resulting from multiple break in underground water lines was an unavoidable malfunction and agreed not to pursue further enforcement actions in regards to scrubber operating and reporting deficiencies that occurred under the previous ownership. The Division also noted that the permittee has taken steps to curb and prevent excess opacity and fugitive emissions from the facility. Since the compliance issues resulting from the 2005 inspection appear to be have been satisfactorily addressed and resolved by the Permittee, no compliance schedule is proposed in this draft permit.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.2.1 limits operation of Mill D-16 to 6000 hours in any consecutive 12-month period and is a PSD avoidance condition. The existing permit limited operation of Mills D-16 and D-18 to 4300 hours each per year. PM emission from D-16 for 6000 hours of operation is less than the PM emissions under the current operational limit for Mills D-16 and D-18. There is no change to any other condition in Section 3 of the current permit.

Condition 3.4.2 in the facility's existing permit limits sulfur content of fuel oil fired in any equipment at the facility to 1.5 wt.%. The sulfur content limit was first included in the facility permit in 1991 and has been carried over in subsequent permits. This limit was introduced in the permit based on information in permit Application No. 4915, which indicated that the facility burns a blend of 60% No. 4 fuel oil and 40% #2 fuel oil with a maximum sulfur content of 1.5 wt.% and an average sulfur content of 1.3 wt.%. However, there was no modification or change in fuel usage or fuel type at the facility in 1991 or in later years. Furthermore, there is no explanation for the sulfur content limit in the permit narratives for the permit issued in response to Application No. 4915.

Potential sulfur dioxide emission with the 1.5 wt.% sulfur content limit is 835 tpy and the facility is already a PSD major source. Hence, the underlying authority for Condition 3.4.2 in the renewed permit is changed from PSD avoidance to Georgia Rule 391-3-1-.02(2)(g)(2). The 1.5wt.% sulfur limit is retained in the renewal permit with the correct citation. The PSD avoidance citation is dropped for this condition in the renewed permit. Actual emission of SO_2 from the facility is less than 50 tpy.

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

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification.

Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

1. Individual Equipment

Testing requirements specified in Permit No. 3295-275-0002-V-03-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

2. Equipment Groups (all subject to the same test requirements):

None applicable.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

Monitoring requirements specified in Permit No. 3295-275-0002-V-03-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

C. Compliance Assurance Monitoring (CAM)

CAM applicability was determined by calculating the pre control PM emissions from each emission unit with a add on control device. All Emission units with a pre control PM emissions in excess of 100 tpy with a add on control device for PM control are subject to CAM.

Table 1 lists pre control PM PTE for each emission unit in Section 3.1 of the permit with a add on control device. Actual outlet loading is expected to be fraction of the 0.02 grain/dscf assumed in calculating uncontrolled PM PTE for control devices for which an exhaust gas flow data is available. Exhaust flow from the emission units D-4 through D-7, D-9, D-15 through D-17 and F-14 into the baghouse D-8 (baghouse 8) is assumed to occur uniformly. Thus, CAM is not applicable to the emission units exhausting into baghouse 8 since pre control potential PM from each of these source is less than 100 tpy.

The precontroled potential PM emission is calculated from the inlet loading to the control device such as a baghouse or bin vent filter whenever such data is available. In Table 1 all emission units with a precontrol potential PM emissions greater than 100 tpy with a add on control device is subject to CAM.

Table 1: PM emissions from emission units with a control device

Source ID	Control Device ID	Control Device Description	Airflow through control device dscf	APCD Efficiency (%)	Uncontrolled Emissions (tpy)
D, E-1, E-2, GGG	D-2	Scrubber 2	7700	97.6	240.9
E-3	F-2	Baghouse 5	2500	99.4	312.8
D-4 to D-7, D-9, D-15 to D-17, F-14	D-8	Baghouse 8	1000	99.4	37.5
H-2	H-1	Baghouse 3	3600	99.4	450.5
H	H-1, H-3, H-7	Baghouse 3 Bin Vent Bin Vent	18000 700 1000	99.4 99.9 99.9	2252 180 117
H-4, C-4	C-6	Baghouse 2	9000	99.4	1126
C-1	C-3	Baghouse 3	53600	98.9	3658
C-7, C-8	C-10	Scrubber 1	19000	97.2	509
F	F-1	Baghouse 4	2500	99.4	312
G, G-3	G-1	Baghouse 6	3750	99.4	469
GG	GG-1	Baghouse 7	12400	99.9	1551
C-12	BV-12	Bin Vent	1300	99.0	98.0
C-16	BV-16	Bin Vent	1300	99.0	98.0
C-19	BV-19	Bin Vent	1300	99.0	98.0
C-24	BV-24	Bin Vent	1300	99.0	98.0
C-25	BV-25	Bin Vent	1300	99.0	98.0
F-9	BV-9	Bin Vent	1300	99.0	98.0
F-11	BV-11	Bin Vent	1300	99.0	98.0
F-12	BVF-12	Bin Vent	1300	99.0	98.0
G-12	BVG-12	Bin Vent	1300	99.0	98.0
G-15	BVG-15	Bin Vent	1300	99.0	98.0
G-18	BV-18	Bin Vent	1300	99.0	98.0
H-5	H-6	Bin Vent	1000	99.0	113
G-4	G-5	Spout Vent	1000	99.9	117
G-7	BV-7	Bin Vent	1000	99.9	117
C-14	C-15	Bin Vent	400	99.9	45
C-17	C-18	Bin Vent	400	99.9	45
C-22	C-23	Bin Vent	400	99.9	45
F-3	F-4	Bin Vent	400	99.9	45
F-5	F-6	Bin Vent	400	99.9	45
F-7	F-8	Bin Vent	400	99.9	45

Source ID	Control Device ID	Control Device Description	Airflow through control device dscf	APCD Efficiency (%)	Uncontrolled Emissions (tpy)
D-13	D-14	Bin Vent	1000	99.9	117
G-6	BV-6	Bin Vent	330	99.0	28
D-10	D-11	Bin Vent	1000	99.9	117
F-10	BV-10	Bin Vent	1000	99.0	87
D-21	BV-21	Bin Vent	300	99.0	25
G-9	BV-9	Bin Vent	330	99.0	28
C-13	BV-13	Bin Vent	700	99.0	60
C-20	BV-20	Bin Vent	300	99.0	25
G-16	BV-16	Bin Vent	300	99.0	25
G-8	BV-8	Bin Vent	330	99.0	28
G-17	BV-17	Bin Vent	330	99.0	28
C-21	BVC-21	Bin Vent	300	99.0	25

For emission units with baghouses, the control efficiency, exhaust grain loading and exhaust gas flow rates were used to determine pre control PM emissions. The baghouse exhaust was assumed to have a maximum grain loading of 0.02 grain/dscf. EPD used this criteria to determine CAM applicability to an emission unit with an add-on control device. Baghouses control emissions from the Fluid bed dryer and cooler, the finished product storage and Industrial product packaging & shipping areas and are 99.9% efficient in controlling PM emissions. For the baghouses subject to CAM, opacity, weekly inspections and temperature (for baghouses receiving exhaust from a dryer or calciner) are the CAM indicators that are monitored. The baghouse opacities are monitored and recorded at least once each day. The baghouse temperature for C-3 and C6 is monitored continuously and all temperature excursions are promptly recorded. Baghouse inspection and preventive maintenance checks are made on the baghouses at least once each week. The baghouse opacities are checked daily. Any unusual issues discovered during baghouse maintenance are reported as excursions in Condition 6.1.7c.

The rotary dryers and coolers have multiclones and scrubbers for PM control. The parameters that are monitored for the scrubbers C-10 and D2 under the CAM plan include the Scrubbant flow rate and the pressure drop across the scrubber. The scrubber parameters are monitored continuously using a flow meter and pressure gauges and are recorded at least once per operating shift. The scrubber control efficiency, exhaust grain loading and exhaust gas flow rate is used for calculating pre control PM loading on the scrubber.

Condition 5.2.9 and 5.2.10 in the facility's current Title V Permit are recordkeeping conditions for the sulfur content of fuel oil used in the fuel burning sources at the facility. These conditions are moved to Section 6.2. and combined into Condition 6.2.6.

Condition 5.2.11 in the facility's current permit is a standard condition describing excess emission, exceedance and excursion of monitored parameters that is recorded and is renumbered as Condition 6.1.7 in the renewed permit. These are reported as specified in Condition 5.3.1 of the current permit. Condition 6.1.7.c. ix requires reporting as excursion any time fuel oil with a sulfur content in excess of 1.5 wt.% is received at the facility.

Conditions 5.3.1 and 5.3.5 in the current Title V Permit are reporting conditions that are renumbered as Conditions 6.1.4 and 6.2.7 in the renewed permit. Condition 5.2.6 in the current permit is a requirement that has been met and is not carried over in the draft renewal permit. Condition 5.2.12 in the facility's current permit is dropped in the renewal permit since this is a one time only requirement.

Conditions 5.3.2 and 5.3.3 in the facility's current permit are renumbered as Condition 6.1.5 and 6.1.6 in the renewed permit.

Conditions 5.3.4 and 5.3.6 in the current permit are recordkeeping conditions for the fuel oil sulfur content and are renumbered as Conditions 6.2.3 and 6.2.4 in the renewed draft permit. Condition 5.3.6 in the facility's existing permit requires daily records of operation of Mills D-16 and D-18. This Condition is renumbered as Condition 6.2.4 in the renewal permit and requires the Permittee to maintain operational records for Mill D-16. Condition 5.3.7 in the facility's existing permit is a reporting requirement for reporting the operational hours of Mills D-16 and D-18 for the last twelve consecutive months. This reporting requirement is moved to Section 6.2 of the renewed permit and renumbered as Condition 6.2.5, requiring reporting of hours for D-16 only since Mill D-18 has been removed from the facility.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 3295-275-0002-V-03-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. Hourly operational records are required to be maintained for the Mill (D-16) since it is subject to a PSD avoidance operational limit.

Condition 6.2.1 in the facility's current permit is not retained in the renewed permit since there are no limits on the operation of the Fluid Bed Dryer C-1 and Rotary Dryers C-7 and E-1.

Condition 6.2.2 in the facility's current permit is dropped in the renewal permit because there are no specific limitations on the production other than the hourly operational limit for mill D-16, which is addressed by Condition 6.2.4 in the renewed permit. Conditions 6.2.3 and 6.2.4 in the facility's existing permit are renumbered as Conditions 6.2.1 and 6.2.2 in the renewed permit.

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.2 addresses minor modifications and or additions that the Permittee may make that are not addressed or prohibited by the permit.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

Please refer to http://airpermit.dnr.state.ga.us/GATV/default.asp for the Online Title V Application for this facility.

Refer to Attachment B of the renewal permit for information on:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

No temporary sources were listed in the Title V Permit application.

E. Short-Term Activities

Form D.5, Short-Term Activities, of the Title V permit application did not contain any short-term activities.

F. Compliance Schedule/Progress Reports

The permit application or the permit does not have any compliance schedule or the need to submit any progress reports since non-compliance issues that were identified in the 2005 inspection have been resolved and the facility has come back into compliance.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Acid Rain Requirements do not apply to the facility.

I. Stratospheric Ozone Protection Requirements

No new stratospheric ozone protection requirements (see subsection J.) apply to the source. The facility has not indicated that they are subject to Title VI and EPD concurs with that determination.

J. Pollution Prevention

The renewal permit does not have any pollution prevention requirements

K. Specific Conditions

All applicable conditions have been covered in other sections of this permit.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Addendum to Narrative

The Permittee public noticed the draft Title V Permit in the May 26 issue of "Thomasville Times-Enterprise". The public comment on Waverly's draft Title V Permit ended on June 26, 2006 without generating any comments. Thus, the Draft Title V Permit was not changed.