

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Waverly Minerals Inc. – Meigs Facility**

City: Meigs

County: Thomas

AIRS #: 04-13-275-00002

Application #: TV-16972

Date SIP Application Received: N/A

Date Title V Application Received: October 3, 2006

Permit No: 3295-275-0002-V-04-1

Program	Review Engineers	Review Managers
SSPP	S. Ganapathy	Richard McDonald
SSCP	Sandra Alvarado	Douglas Waldron
ISMP	Daniel McCain	DeAnna Oser
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/proposed 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 proposed 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 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 for the Meigs facility. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3295-275-0002-V-04-0	July 5, 2006	x	

Table 2: Comments on Specific Permits

Permit Number	Comments
3295-275-0002-V-04-0	Renewal Title V Permit for Meigs Facility. The permit application did not have the flow rate and pressure drop ranges for Scrubber No. 1 and 2 that were approved by EPD in an earlier consent order. This amendment incorporates those approved scrubber operating parameters

B. Regulatory Status

1. PSD/NSR/RACT

This facility is a major source under the 40 CFR 52.21 Prevention of Significant Deterioration (PSD) because its potential emissions of PM and SO₂ 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 SO₂ from the facility is less than 50 tpy.

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

II. Proposed Modification

A. Description of Modification

The Permittee has requested EPD to incorporate the approved flow rates and pressure drop ranges for Scrubber No. 1 and 2. The Permittee did not include the approved flow rates and pressure drop ranges for the Scrubbers in its Title V Application. Permittee has requested changes to Condition 6.1.7 c.v to c.viii.

B. Emissions Change

The requested changes to the Scrubber operating parameters were approved as part of a consent order agreed to by EPD and the Permittee in 2002 and should not result in increase of emission of any pollutant. These changed parameters for the scrubbers was never formally incorporated into the facility's Title V Permit. During the permit renewal process the previous (old) parameters in effect before the consent order were inadvertently included in the renewal permit application and subsequently in the facility's existing permit. The scrubber parameters in the consent order were obtained after adequate testing by the permittee that demonstrated compliance with various applicable limits and standards under the new scrubber operating parameter ranges.

The minimum scrubber flow rate in Condition 6.1.7 c v. was changed to 100 gallons/minute from 250 gallons/minute based on testing done in 2002 as part of the consent order. The scrubber pressure drop range was changed to 5 to 15 inches of water from 6 to 12 inches of water. Thus, the operating pressure drop range was increased for Scrubber No. 1 based on tests done as part of the consent order settlement in 2002. For Scrubber No. 2 the minimum flow rate was changed to 100 gallon/minute from 350 gallon/minute. The upper range of pressure drop for Scrubber No. 2 was changed to 25 inches of water from 18 inches of water based on testing of scrubber performance as part of the consent order in 2002.

C. PSD/NSR Applicability

The modification is not subject to PSD or NSR since there is no increase in emission of any pollutant due to this change.

III. Facility Wide Requirements

Not Applicable.

A. Emission and Operating Caps

There is no new or modified facility wide caps or limits on emissions, hours of operation, etc. due to the amendment.

B. Applicable Rules and Regulations

- Rules and Regulations Assessment – Not Applicable
- Emission and Operating Standards – Not Applicable.

C. Compliance Status

The facility appears to operate in compliance with all applicable rules and regulations and with the terms and conditions of its current air quality permit.

D. Operational Flexibility

Not Applicable.

E. Permit Conditions

No new permit conditions are added to this section of the permit. No existing conditions are changes as well.

IV. Regulated Equipment Requirements

A. Brief Process Description

There is no change to the facility's current process description.

B. Equipment List for the Process

There is no change in the equipment list for the process.

C. Equipment & Rule Applicability

- Emission and Operating Caps – No changes to existing emission and operating caps.

- Applicable Rules and Regulations -

Rules and Regulations Assessment: There is no change to the existing rules and regulations that apply to the facility due to this permit amendment.

Emission and Operating Standards: No changes to the emission and operating standards result from this permit amendment.

D. Compliance Status

The facility appears to operate in compliance with all applicable rules and regulations and with the terms and conditions of its current air quality permit.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

There is no change to permit conditions in this section.

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

A. Individual Equipment: No new testing is required by this amendment.

B. Equipment Groups (all subject to the same test requirements): Not Applicable.

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

A. Individual Equipment: There is no change to the current monitoring requirements for existing sources.

B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable.

VI. Other Record Keeping and Reporting Requirements

Condition 6.1.7 c v. to viii was changed to incorporate scrubber operating parameters that were approved by EPD in a consent order in 2002. The flow rate for both scrubbers should be above 100 gallons/minute. For Scrubber No. 1, the pressure drop range for reporting excursions was changed to 5 to 15 inches of water from 6 to 12 inches of water. For Scrubber No. 2, the upper pressure drop limit for reporting excursions was changed to 25 inches of water from 18 inches of water. These values were approved by EPD in 2002 and inadvertently the old scrubber operating parameters were reintroduced during the renewal process based on the information submitted in the renewal application. The scrubber parameters in the 2002 consent order was never formally incorporated in the facility's Title V Permit.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

There is no change to the insignificant activities listed in Attachment B of the facility's current permit.

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

None required by this permit amendment.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not Applicable.

I. Prevention of Accidental Releases

This modification does not change the source's applicability to this provision.

J. Stratospheric Ozone Protection Requirements

This modification does not change the source's applicability to Title VI.

K. Pollution Prevention

Not Applicable.

L. Specific Conditions

None.

Addendum to Narrative

The 45-day EPA review started on November 16, 2006 and ended on January 1, 2007. Comments were not received by the Division. No change was made to the permit amendment proposed to EPA.

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Draft Permit Review		
Reviewing Program	Were Comments Received (y/n)?	Were Comments Taken into Consideration in Draft Permit (y/n)?
ISMP	yes	yes
SSCP	no	no
Toxics	N/A	N/A

SSPP Unit Manager: _____
Richard McDonald Date

SSPP Program Manager: _____
Jac Capp Date