

TITLE V APPLICATION REVIEW

Facility Name: **Waverly Mineral Products Co.**

City: Meigs

County: Thomas

AIRS #: 04-13-275-00002

Application #: TV- 9065

Date Application Received: October 17, 1996; Updates Received August 24, 1998 & July 9, 1999

Date Application Deemed

Administratively Complete: March 19, 1997; Last Update: October 5, 1999

Date of Draft Permit: October 10, 1999

Permit No: 3295-275-0002-V-03-0

Program	Review Engineers	Review Managers
SSPP/ASU	Noel DoHarris	James P. Current
SSCP/ASU	Richard McDonald	Lou Musgrove
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TOXICS		

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Waverly Mineral Products Company 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 participation process will be described in an addendum to this narrative.

I. Facility Description

The Facility Description may be presented in outline or narrative form. It must contain the information contained in each of the following subsections, preferably in a similar order.

A. Facility Identification

1. Facility Name: Waverly Mineral Products Co.
2. Parent/Holding Company Name: United Catalysts, Inc.
3. Previous and/or Other Name(s): No previous or other names exist for this facility.
4. Facility Location: 31670 Georgia Highway 3
Meigs, Georgia 31765
(Thomas County)
5. The facility is not located in the non-attainment area.
6. Class I Area Impacts: The facility is located within 100 kilometers of the St. Marks Class I area.

B. Site Determination

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

C. Existing Permits

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
3295-275-0002-E-02-0	June 22, 1998		U

D. Process Description

1. SIC Code(s): Major - 3295 (Minerals and Earths, Ground or Otherwise Treated)
2. Description of Products: Primary products of this facility are oil/grease absorbents and cat litter.
3. Overall Facility Process Description

Crude 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.

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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 for use as an oil and grease absorbent and some brands of cat litter. 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 the market place by highway and rail transportation.

4. Overall Process Flow Diagram: Hard copy included with the application.

E. Regulatory Status

1. PSD/NSR

This facility is a major source under 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.

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

3. MACT Standards

No current MACT standards apply to this facility.

4. Program Applicability

Program Code	Applicable (Yes/No)
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

II. Regulatory Analysis

Facility Wide Requirements

- A. Emission and Operating Caps: There are no facility wide emission or operating caps applicable to the facility.
- B. Applicable Rules and Regulations: There are no specific facility wide rules or regulations applicable to this facility.
- C. Compliance Status: There are no current compliance issues for this facility.
- D. Operational Flexibility: The facility did not request any alternate operating scenarios for any of its equipment or processes.
- E. Permit Conditions: There are no specific facility wide Permit Conditions for this facility.

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 and other absorbents.

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B. Equipment List for the Process

Emission Units		Specific Limitation(s)*		Air Pollution Control Devices	
ID No(s).	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
Crushing and Milling					
A	Primary Crushing	391-3-1-.02(2)(p)	3.4.1	None	None
B	Secondary Crusher No. 1	391-3-1-.02(2)(p)	3.4.1	None	None
BB	Secondary Crusher No. 2	391-3-1-.02(2)(p)	3.4.1	None	None
D	Screening & Milling	391-3-1-.02(2)(p)	3.4.1	D-1 D-2 D-4	Multiclone Scrubber No. 2 Vacukleen
D-4	Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
H-2	Pug Mill 1	391-3-1-.02(2)(p)	3.4.1	H-1	Baghouse
H-4	Pug Mill 2	391-3-1-.02(2)(p)	3.4.1	C-6	Baghouse
D-16	Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.2.1, 3.3.1, 3.4.1	D-8	Baghouse
D-18	Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.2.1, 3.3.1, 3.4.1	D-19 D-20	Cyclone & Baghouse
B-3	Pug Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
D-5	Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
Dryers, Kilns and Coolers					
C-1	Fluid Bed Dryer	391-3-1-.02(2)(p)	3.4.1	C-2 C-3	Cyclone Baghouse
C-4	Fluid Bed Cooler	391-3-1-.02(2)(p)	3.4.1	C-4 C-6	Cyclone Baghouse
C-7	Rotary Dryer No. 1	391-3-1-.02(2)(p)	3.4.1	C-9 C-10	Multicyclone Scrubber No. 1
C-8	Rotary Cooler No. 1	391-3-1-.02(2)(p)	3.4.1	C-9 C-10	Multicyclone Scrubber No. 1
E-1	Rotary Kiln No. 2	391-3-1-.02(2)(p)	3.4.1	D-1 D-2	Multiclone Scrubber No. 2
E-2	Rotary Cooler No. 2	391-3-1-.02(2)(p)	3.4.1	D-1 D-2	Multiclone Scrubber No. 2
Conveyors					
D-15	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
D-17	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
C-12	Conveyor	40 CFR 60 Subpart OOO	3.3.1, 3.4.1	F-13	Baghouse
C-16	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse

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Emission Units		Specific Limitation(s)*		Air Pollution Control Devices	
ID No(s).	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
C-19	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
C-24	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	None
C-25	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	None
C-26	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
C-27	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
F-14	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
D-22	Pneumatic Conveyor	391-3-1-.02(2)(p)	3.4.1	None	None
F-9	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
F-11	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
F-12	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
B-1	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
B-5	Extruder Take-Away Conveyor	391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
F-14	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
D-9	Pneumatic Conveyor	391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
D-12	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
G-15	Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
Storage and Packaging					
AA	Raw Clay Storage	391-3-1-.02(2)(p)	3.4.1	None	None
B-6	Bentonite Hopper	391-3-1-.02(2)(p)	3.4.1	None	None
B-7	Bentonite Feeder	391-3-1-.02(2)(p)	3.4.1	None	None
F	Finished Product Storage	391-3-1-.02(2)(p)	3.4.1	F-1	Baghouse
G	Industrial Product Packaging	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	G-1	Baghouse
GG	Domestic Product Packaging	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	GG-1 GG-2	Multiclone Vacukleen
GGG	Scoop Litter Packaging	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-1 D-2	Multiclone Scrubber No. 2
H	Fines & Dust Storage	391-3-1-.02(2)(p)	3.4.1	H-1 H-3 H-7	Baghouse Bin Vent Bin vent
H-5	Truck Bin	391-3-1-.02(2)(p)	3.4.1	None	None

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Emission Units		Specific Limitation(s)*		Air Pollution Control Devices	
ID No(s).	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
C-14	Stock Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	C-15	Bin Vent
C-17	Stock Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	C-18	Bin Vent
C-22	Stock Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	C-23	Bin Vent
F-3	Product Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-4	Bin Vent
F-5	Product Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-6	Bin Vent
F-7	Product Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-8	Bin Vent
G-6	Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
D-13	Soda Ash Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-14	Bin Vent
D-10	Fines Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-11	Fines Bin Vent
G-9	Packers	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
G-18	Packer	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
Loading and Unloading					
G-3	Truck & Railcar Loadout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	G-1	Baghouse
G-4	Rail Loadout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	G-5	Spout Vent
G-7	Bag Loadout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
Elevators					
E-3	Elevator	391-3-1-.02(2)(p)	3.4.1	F-2	Baghouse
C-13	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
C-20	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
F-10	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
D-21	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
D-6	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
D-7	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	D-8	Baghouse
G-16	Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
Other Equipment					
D-23	Slurry System	391-3-1-.02(2)(p)	3.4.1	None	None

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Emission Units		Specific Limitation(s)*		Air Pollution Control Devices	
ID No(s).	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
G-8	Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
G-17	Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
G-10	Sealer	391-3-1-.02(2)(p)	3.4.1	None	None
B-4	Extruder	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
B-6	Bentonite Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
B-7	Bentonite Feeder	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	None	Wet Process
C-21	Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse
D-19	Cyclone	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)	3.3.1, 3.4.1	F-13	Baghouse

* Generally Applicable Requirements listed in Part 8 of the Permit may apply to emission units listed above.

C. Equipment & Rule Applicability

! Emission and Operating Caps -

Mills D-16 and D-18 are each limited to 4,300 hours of operation during any twelve consecutive month period. This requirement was necessary to avoid a PSD review of two air quality permit applications submitted in 1998.

! Applicable Rules and Regulations -

There are numerous emission units subject to 40 CFR 60 Subpart OOO at this source (for details refer to the equipment list in III B above). Stack emissions from sources subject to 40 CFR 60 Subpart OOO are limited to 0.02 gr/dscf and total 58.8 tons per year of particulate matter. None of the driers or kilns at this facility are subject to 40 CFR part 60 Subpart UUU as they were all installed prior to 1986 and have not been subsequently modified or reconstructed.

All equipment at the facility are subject to Georgia’s Rule 391-3-1-.02(2)(p), “Particulate Emissions from Kaolin and Fuller’s Earth Processes.” The equations used to determine the allowable emission rates for the subject equipment are described in Condition 3.4.1 in the permit.

There are numerous emission units subject to 40 CFR 60 Subpart OOO at this source. Stack emissions from sources subject to 40 CFR 60 Subpart OOO are limited to 0.02 gr/dscf. NOx emissions from the dryers and kiln total 17.2 tons per year. Visible stack emissions from sources subject to 40 CFR 60 Subpart OOO are limited to 7% opacity. Visible emissions from 40 CFR 60 Subpart OOO sources whose emissions are not vented through an air pollution control device and/or stack are limited to 10% opacity.

For those pieces of equipment subject to 40 CFR 60 Subpart OOO, compliance with the more stringent particulate matter emission limits associated with 40 CFR 60 Subpart OOO assures compliance with the less restrictive emission limits of Georgia's Rule 391-3-1-.02(2)(p). For details of equipment subject to these rules, refer to the equipment list in III B above.

- D. Compliance Status: No compliance issues were reported by the facility.
- E. Operational Flexibility: The facility made no requests for operational flexibility.
- F. Permit Conditions:

Condition 3.2.1 limits the operation hours of Mills D-16 and D-18 to 4,300 hours of operation during any twelve consecutive month period. As mentioned before, this requirement was effected to avoid PSD review.

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

A. General Testing Requirements

This permit specifies that a performance test may be required to determine compliance with the emission limits in Part 3.0, and the test methods to be used to determine compliance are listed. A general condition to require notification of any test and for the submission of a test plan is included.

B. Specific Testing Requirements

The initial performance tests required by 40 CFR 60.8 and the current Air Quality Permit have been completed for all existing equipment. This permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment. If these changes are made, a condition is present to require the initial performance test be performed in accordance with 40 CFR 60.8 and the applicable subpart. Additional performance testing is not required by any applicable regulation, therefore this permit does not contain any conditions to require specific testing for any source.

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

A. General Monitoring Requirements

This permit specifies that any monitoring systems installed should be in continuous operation and that downtime due to maintenance should be minimized.

B. Specific Monitoring Requirements

Sources at the facility are subject to Georgia Rules (b), (p) and/or 40 CFR 60, Subpart OOO for particulate Matter and visible emissions (Opacity). Various sources at the facility, such as grinding mills and storage silos, are controlled by baghouses. For large emissions units, Visible Emissions are used as the primary means of monitoring baghouse performance with the additional requirement that a Preventive Maintenance Program be developed and implemented.

On the large emissions units, Visible Emissions are checked at least once for each day of operation. The Visible Emissions must be below a given opacity action level or corrective action is required. The opacity action levels are related to the particulate matter emission limitation for a particular source. The opacity action level is, however, set lower than the opacity limitation in the applicable requirement. The opacity action level, in combination with the Preventive Maintenance Program, should reasonably assure that particulate matter and opacity limitations are not exceeded. The Preventive Maintenance Program requires weekly monitoring of pressure drop and maintenance checks. Each time that problems are revealed by the visible emissions check that are not corrected within 24 hours must be reported as a deviation. The information gathered by the Preventive Maintenance Program is retained by the Permittee and submitted upon request.

Emissions units, controlled by baghouses, that have low emissions and/or infrequently operated are not required to perform monitoring because the likelihood of the PM or Opacity limitations being exceeded is minimal.

The baghouses receiving gases from combustion sources are also required to monitor (not record) temperature continuously and to record the date and time of all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand. The temperature may be monitored at the baghouse inlet or may be monitored at some other location provided an equivalent maximum temperature is determined. Each time the temperature monitored exceeds the specified temperature is reported as a deviation.

Rotary Dryer No. 1, Rotary Cooler No. 1, Rotary Kiln No. 2, Rotary Cooler No. 2, and various other screening, milling, and packaging units are controlled by one of two venturi scrubbers (C-10 and D-2). The current SIP permit requires that the scrubbant flow, scrubbant pressure, and gas pressure drop be read and recorded once each operating shift. This permit retains the requirement to read and record scrubbant flow and pressure drop once per shift. The Permittee is required to establish operating ranges for these parameters that are representative of normal operation and report deviations based on these representative levels. Scrubbant pressure is no longer required to be read and recorded in this permit since it is typically used as a surrogate for scrubbant flow which is directly measured in this permit.

The permit requires all uncontrolled sources be checked daily for obvious mechanical failure and the presence of Visible Emissions. The permit includes a requirement to take corrective action and keep records. If problems are revealed during the daily check, they must be reported if not corrected within 24 hours.

All fuel burning sources at the facility burn either natural gas or fuel oil. Fuel oil sulfur is limited to 1.5 percent. Fuel supplier certifications are required for each shipment of fuel oil to verify compliance with the sulfur limit. The certifications are required to list the fuel sulfur content, test methods used, and the location of the oil when the samples were drawn. All fuel burning sources are controlled by either a baghouse or a scrubber so particulate matter monitoring is as specified for those control devices.

C. Record Keeping and Reporting Requirements:

Records, including identification of any deviations from 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. The Permittee is also required to keep and report records on the hours of operation of Mills D-16 and D-18 and report the fuel supplier certifications, including fuel sulfur content.

VI. Other 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 related information to deviations from applicable requirements.

B. Specific Record Keeping and Reporting Requirements:

The current permit requires that usage and fuel oil consumption records be kept for Dryers C-1, C-7, and E-1 as well as hourly production records for all sources. These records are not required to verify compliance with any specific permit limits but are retained in this permit.

VII. Specific Requirements

A. Operational Flexibility: Not applicable.

B. Alternative Requirements: Not applicable.

C. Insignificant Activities:

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	T
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	--
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:: i) less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. ii) less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. iii) less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	--
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		--
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	--
	4. Stationary engines burning: i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators; ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	--
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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	T
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	--
	2. Portable blast-cleaning equipment.	--
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	--
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	T
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	--
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	--
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	--
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	--
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	--
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	--
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	--
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	--
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	--

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	--
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	--
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	--
	iii) Kilns for firing ceramic ware.	--
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	--
	v) Bakery ovens and confection cookers.	--
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	--
	i) Activity is performed indoors; and	
	ii) No significant fugitive particulate emissions enter the environment; and	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	--
	5. Grain, food, or mineral extrusion processes	--
6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	--	
7. Equipment for the mining and screening of uncrushed native sand and gravel.	--	
8. Ozonization process or process equipment.	--	
9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	--	
10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	--	
11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	--	
12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	--	
13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	--	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	--
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	4
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	1
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	--
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	--
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	--
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	--

D. Temporary Sources:

No temporary sources were listed in the Title V application.

E. Short-Term Activities:

No short-term activities were listed in the Title V application.

F. Compliance Schedule/Progress Reports:

Not applicable.

G. Emissions Trading:

Not applicable.

H. Acid Rain Requirements:

Not applicable.

I. Prevention of Accidental Releases:

No applicability indicated.

TITLE V APPLICATION REVIEW

J. Stratospheric Ozone Protection Requirements:

No applicability indicated in the application.

K. Pollution Prevention:

No additional pollution prevention controls have been indicated by the facility.

L. Specific Conditions:

All conditions have been covered elsewhere in the review.

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.