

Facility Name: **J. M. Huber Corporation - Macon Plant**
 City: Macon
 County: Twiggs
 AIRS #: 04-13-289-00001

Application #: TV-15110
 Date Application Received: March 10, 2004
 Date Application Deemed Administratively Complete: May 10, 2004
 Date of Draft Permit:
 Permit No: 1455-289-0001-V-02-0

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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 **J. M. Huber Corporation - Macon Plant** 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: J. M. Huber Corporation - Macon Plant.

2. Parent/Holding Company Name

J. M. Huber Corporation.

3. Previous and/or Other Name(s)

None.

4. Facility Location

822 Huber Road
Macon, Georgia 31217

5. Attainment or Non-attainment Area Location

The facility is located in an area designated as an attainment area for all criteria pollutants.

6. Class I Area Impacts

The facility is not located within 200 km of a Class I area.

B. Site Determination

There are no other manufacturing facilities which could possibly be contiguous or adjacent and under common control.

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
1455-289-0001-V-01-0	September 10, 1999	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
1455-289-0001-V-01-0	Initial Title V permit.

D. Process Description

1. SIC Codes(s)

The Major and Other SIC Code(s), if applicable.

Major - 1455.

Other - 3295.

2. Description of Product(s)

The facility processes kaolin clay.

3. Overall Facility Process Description

The following is a description of the operations used process kaolin at this facility.

Mining : The plant operates two general mining operations, one in Twiggs County and the other is in Wilkinson County. Crude clay is mined and hauled by truck to a stationary blunger where it is turned into slurry and pumped approximately 4 miles to the Plant (23 miles in case of the Wilkinson County operation).

Washplant Operations : The slurry is centrifuged for particle sizing, grinded for delamination in attrition mills, ozonated for increased brightness, and magnetically-separated for ferrous material removal all to increased brightness. The slurry is rotary-vacuum filtered to dewater it into a "filter cake."

Spray Dryers : Two spray dryers, No. 2 (S-735) and No. 4 (S-689), are used to dry the dewatered kaolin filter cake to approximately 1% moisture and store it in Silos. This product is either bagged, sold as bulk, or sent to Slurry Makedown.

Slurry Makedown : Some of this kaolin product is sold as a high percent solids slurry. To achieve this, the spray dried clay is mixed with "filter cake" and heavily agitated in a Makedown system and the product is either loaded into tanker trucks or tanker railcars for shipment to the customer.

Impact Mill: Impact Mill (S-645) is used to fine grind water washed clays after spray drying.

Calciner: A portion of spray dried clay requires calcining in the only Calciner (S-760). Calcining drives off chemically bonded water and changes the physical structure by exposing the clay.

Ink Clay: This is a small mini-plant consisting of a hot Water Heater (S-850), mixing tank, centrifuge, Furnace (S-629), Cyclone (S-630), Baghouse (S-631) and rejects Baghouse (S-779). This is a specialty clay manufactured for the printing industry.

Calcined Treated Clays: This is a small mini-plant consisting of a turbulizer and disintegrator for applying and mixing surfactants with calcined clays.

Bagging and Truck Loading: There are several baggers and silo loading is done through filling bulk rail cars.

4. Overall Process Flow Diagram (optional)

None.

E. Regulatory Status

1. PSD/NSR

Although the facility has a Macon address, it is located in Twiggs County which is designated as an attainment area for all criteria pollutants and is not presently classified as a major stationary source as defined by federal Prevention of Significant Air Quality Deterioration (PSD) regulation, 40 CFR 52.21.

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

3. MACT Standards

This facility is neither major for HAPs nor subject to any proposed or final MACT Standards. Condition 2.1.2 imposes 40 CFR 63 NESHAP avoidance limitations meant for this purpose.

4. Program Applicability

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:

Condition 2.1.1 is a modified version of Condition 3.5.6 of Title V permit No. 1455-289-0001-V-01-0. It employs ASTM D396, *Standard Specifications of Fuel Oils*, definition of fuel oils No. 1 or No. 2 to limit fuel oil sulfur content to amounts that do not exceed 0.5 percent by weight. Also, Condition 2.1.1 introduces a new limit capping sulfur dioxide (SO₂) and nitrogen oxides (NO_x) emissions to amounts less than 250 tons during any 12 consecutive month period. This is meant to limit afford the J. M. Huber flexibility to use its internal combustion (IC) engines without compromising 40 CFR 52.21 Avoidance.

Condition 2.1.2 carries over the restrictions mandated by Conditions 3.5.4 & 3.5.5 of the company's current Title V permit. J. M. Huber stated, in Title V Application No. TV-15110, that "[t]o provide the facility with the flexibility in formulation and production while assuring that any case-by-case MACT requirements are to be avoided, remove Conditions 3.5.3 and 3.5.4 that dictates total production of Treated Water Wash Clay shall not exceed 25 tons per 12 consecutive months." As a matter of fact, existing Condition 3.5.5 prohibits the emission of an individual HAP in an amount equal to or exceeding 10 tons, during any twelve consecutive months, from the production of treated clays. As requested condition 2.1.2 will provide a method for assuring compliance while affording the company formulation and production flexibility.

B. Applicable Rules and Regulations

The plant is not subject to any facility-wide air quality rules other than the general requirements of the New Source Performance Standards (NSPS) 40 CFR 60. This is in addition to the general provisions in Section VIII of the enclosed permit and the general provisions contained in Rule 391-3-1-.02(2)(a).

C. Compliance Status

There are no compliance issues.

D. Operational Flexibility

None associated with the enclosed permit.

E. Permit Conditions

No facility-wide conditions are included in the permit other than NSPS general requirements and the general provisions in Section VIII and, the abovementioned, cap on the sulfur content of all fuel oil fired.

III. Regulated Equipment Requirements

A. Brief Process Description

Several kaolin clay processing operations are performed at this plant, including: drying, calcining, milling, and storage, bagging & bulk product loading.

B. Equipment List for the Process

Please see Section 3.1 of the enclosed permit.

C. Equipment & Rule Applicability

Emission and Operating Caps –

Conditions in Section 2.1 and 3.2 of the enclosed permit are meant to avoid the provisions of 40 CFR 52.21, *Prevention of Significant Deterioration of Air Quality (PSD)*.

Condition No. 2.1.1 requires fuel oil burnt to meet the specifications for fuel oils number 1 or 2 as defined by ASTM D396. This, indirectly, imposes a less than 0.5% limit on the Sulphur content of fuel oil which is more restrictive than Georgia Rule 391-3-1-.02(2)(g).

Applicable Rules and Regulations -

Spray Dryer No. 4 (S-687) is subject to the *New Source Performance Standards (NSR)*, 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*. As identified in Section 3.1, units at this plant are subject to 40 CFR 60 Subpart 000, *Standards of Performance for Nonmetallic Mineral Processing Plants*, Georgia Air Quality Control Rules 391-3-1-.02(2)(p), *Particulate Emissions from Kaolin and Fullers Earth Processes*, and 391-3-1-.02(2)(b), *Visible Emissions*. Also, some fuel burning sources are subject to Georgia Rules 391-3-1-.02(2)(d), *Fuel-burning Equipment*, and 391-3-1-.02(2)(g), *Sulphur Dioxide*. Title V

Application No. TV-15110 shows that the Company has the following internal combustion engines & combustion turbines: Generator #1 (S695) and Generator #2 (S696), each of which is rated at 1250 kilowatts and two Ruston #2 Turbine Generator (S698) and #3 Turbine Generator (S699), each of which is rated at 1000 kilowatts. All of the 4 generators preexist Georgia Rule (mmm), *NOX Emissions from Stationary Gas Turbines and Stationary Engines used to Generate*

Electricity. Also, the generators are not subject to Rule (d) because no direct heat transfer is associated with production of thermal energy. However, to ensure that emissions resulting from the operation of those generation will not inducing sulfur dioxide (SO₂) and nitrogen oxides (NO_x) emissions in amounts equal to or in excess of 250 tons during any 12 consecutive months, Conditions 4.2.2, 4.2.3, 5.2.9, 5.2.10, 6.2.2, 6.2.3, 6.2.4, & 6.2.5 have been newly introduced to this renewal permit.

D. Compliance Status

There are no compliance issues.

E. Operational Flexibility

None associated with the enclosed permit.

F. Permit Conditions

Some equipment was permitted to avoid the Regulations 40 CFR 52.21, *Prevention of Significant Deterioration (PSD) of Air Quality*. The company opted to take some emissions limits and operating standards (See Section 2.1 and 3.2 of the enclosed permit), sometimes stricter than those mandated by NSPS, to avoid being subject to 40 CFR 52.21.

Other than the above mentioned, the limits mandated by the federal New Source Performance Standards and Georgia Air Quality Control Rules shall prevail (See Sections 3.4 and 3.5 of the enclosed permit).

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. However, this permit adds the NSPS Subpart OOO Calcine Pre-grinder #3 (S-756) to Section 3.1 and testing will be required.

B. Specific Testing Requirements

1. Individual Equipment

Not applicable.

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

The initial performance tests required by 40 CFR 60.8 and the current Air Quality Permit should 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.

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

1. Individual Equipment:

No. 4 Spray Dryer is subject to 40 CFR, Part 60, Subpart UUU and particulate matter emissions are controlled by a baghouse. Subpart UUU requires that a Spray Dryer equipped with a dry control device, such as a baghouse, have a Continuous Opacity Monitoring System (COMS). The COMS was determined to be sufficient monitoring to assure compliance with the PM limitation and no other monitoring is required. The exceedances for No. 4 Spray Dryer are as defined in Subpart UUU.

The sulfur content of fuel oil burned in all fuel burning sources is limited by this permit to 0.5 percent by weight. This limitation is more stringent than the Georgia rule (g) sulfur limit and will be monitored by fuel supplier certifications. The Permittee is required to obtain from the fuel oil supplier, a certification that the oil is 0.5 percent sulfur by weight or less (Condition 5.2.7 of the existing permit, inaccurately, put this at 0.3%). Additionally, Permit Condition 2.1.1 limits the consumption of fuel oil during any 12-consecutive month period and records of fuel usage are required to assure compliance with this limitation.

Boilers Nos. 1 and 2 are subject to Georgia Rules (b) and (d) for visible emissions and particulate matter. The Rule (d) allowable particulate matter emission rate for the Boiler is 0.292 lb/MM BTU with an AP-42 estimated emission rate of 0.0143 lb/MM BTU. Since the estimated emission rates for all boilers are only a fraction of the allowable emission rates, no monitoring will be required.

Generators Nos. 1 and 2, and Turbine Generators Nos. 3 and 4 are all natural gas fired and use No. 2 fuel oil as a back up and are all subject to the 40 percent opacity limitation of Georgia Rules 391-3-1-.02(2) (b). The likelihood of the applicable opacity limitation being exceeded is very low; therefore no monitoring is required.

The baghouses that are subject to condition 5.2.2 represent larger baghouses that control emissions from sources subject to the emission limitations of Georgia Rules 391-3-1-.02(2)(p), (b), and/or 40 CFR Part 60 Subpart OOO. To reasonably assure compliance with applicable PM limitations, a visible emissions (VE) check is required each day of operation of the emissions units controlled by the baghouses. Corrective actions are

required for visible emissions which equal or exceed a specified opacity action level. In addition, a Preventive Maintenance Program is required on these baghouses. The program requires weekly monitoring of baghouse pressure drop and the performance of operation and maintenance checks on the baghouses. All VE and Preventative Maintenance Program information is retained by the Permittee and submitted to the Division upon request. Excursions, to be reported semiannually, are specified.

Baghouses, bin vents and filter receivers controlling emissions from individual bins, wet screening operations, bucket elevators, belt and pneumatic conveyances, and bagging operations are exempted from detailed monitoring provisions due to little likelihood of significant Particulate Matter emissions.

Baghouses S-631, S-735, S-689, S-764, and S-767, which receive gases from combustion sources, are required to monitor (not record) temperature continuously and to record all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand.

The permit requires all uncontrolled sources except those that specify no monitoring by this narrative, be checked daily for obvious mechanical failure and all uncontrolled sources be checked for the presence of Visible Emissions. The permit includes requirements to take corrective action and keep records. If problems are revealed during the daily check, they must be reported in the semiannual report if not corrected within 24 hours.

Each emission unit controlled by a baghouse that *"has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source,"* as defined by 40 CFR §64.2(a)(3) is subject to CAM. The company submitted a Spreadsheet addressing the limits mandated by NSPS Subparts OOO & UUU and Georgia Rules (p & e). Conditions 5.2.11, 5.2.12 and 5.2.13 have been written to include the CAM requirements for the emissions units listed in Section 3.1 which are equipped with a *"control device,"* as defined by 40 CFR 64.1. Namely, the following pollutant specific emission units (PSEU) are subject to the Compliance Assurance Monitoring:

Emission Unit	Pollutant
#5 Raymond Mill (S-627)	Particulate matter
Impact Mill (S-645)	
#2 Spray Dryer (S-730)	
#4 Spray Dryer (S-687)	
Calciner #1 (S-760)	
Pneumatic Conveying Systems from Silos 5,6,7,8 (S-664)	
Bagger #2 (S-805)	
Bagger #2 Bin (S-804)	
Bagger #4 (2 Spout) (S-810)	
Bagger #4 Bin (S-811)	
Impact Mill Loadout Bin (S-639)	
Bin #1 (S-635)	
Silo #9 (S-673)	
Silo #10 (S-676)	
Silo #11 (S-679)	

Emission Unit	Pollutant
Slurry Makedown Bin #1 (S-813)	
Slurry Makedown Bin #2 (S-814)	
Slurry Makedown Bin #4 (S-818)	
#2 Spray Dryer Conveyor Belt (S-732)	
#2 Sp Dryer Bucket Elevator (S-733)	
Silo #20 (S-701)	
Silo #21 (S-704)	
Silo #22 (S-707)	
Silo #23 (S-713)	
Silo #24 (S-717)	
Silo #20 Rail Car Loading Spout (S-701)	
Silo #21 Rail Car Loading Spout (S-704)	
Silo #22 Rail Car Loading Spout (S-707)	
Silo #23 Rail Car Loading Spout (S-713)	
Silo #24 Rail Car Loading Spout (S-717)	
Silo #25 Rail Car Loading Spout (S-720)	
Conveyor Belt to Bagger #10B (S-870)	
Calciner Pre-grinder #1 (S-752)	
Calciner Pre-grinder #2 (S-753)	
Calciner Pre-grinder #3 (S-756)	
Calciner Pre-grind Surge Bin (S-757)	
Calciner Product Surge Bin (S-769)	
Calciner Post-grinder #4 (S-771)	
Calciner Post-grinder #5 (S-772)	
Calciner Post-grinder #6 (S-773)	
Calciner Post-grinder #7 (S-774)	
Calciner 1-ton Bagger Surge Bin (S-790)	
Calciner One-ton Bagger #7 (S-789)	
Calciner One-ton Bagger #8 (S-792)	
50# Bag Vacuum Packer #9 (S-793)	
Calciner Bagger Feed Bin #5 (S-798)	

J. M. Huber made several reversion to its CAM plan, the last one was in its October 31, 2005 correspondence (received on November 3, 2005) and has been adopted in the enclosed permit. Also, the company requested make revisions to Section 3.1, revised its "Insignificant Activities List," and clarified the control devices to be depicted as "Bin Vents" in its permit.

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

Small baghouses and those that operate infrequently are not required to do detailed monitoring due to little likelihood of significant particulate matter emissions. On the larger frequently operated baghouses, visible emissions are checked at least once each day of operation. The visible emissions must be below a given opacity action level or corrective action is required. The opacity action levels vary based on the particulate matter emission limits (i. e. NSPS or SIP). Sources with higher particulate matter emission limits have higher opacity action levels. The opacity action levels are, however, lower than the opacity limitations in the SIP visible emissions rule and NSPS. The opacity action levels selected correspond to properly operated baghouses, which is indicative of compliance with the applicable particulate matter standard. A Preventive Maintenance Program is required on the larger frequently operated baghouses. The program requires weekly monitoring of pressure drop and maintenance checks. The

baghouses receiving gases from combustion sources are required to monitor (not record) temperature continuously and to record all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand. Excursions include each time problems are revealed by the visible emissions check that persist the next day, each time the temperature exceeds the specified level, and the failure to implement preventative maintenance.

Condition 6.2.6 is meant to ensure compliance with the HAPs limits in condition 2.1.2. It requires the Company to determine the twelve-consecutive month rolling total of individual and combined HAPs emitted from the entire facility during each calendar month starting from the month on which the permit takes effect.

The permit requires all uncontrolled sources, except those exempt by condition 5.2.5, be checked daily for the presence of visible emissions. The permit includes requirements 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.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

Records, including identification of any deviations from applicable monitoring triggers, the cause of such occurrence, the corrective action taken, and the certifications that fuel oil received is distillate oil and only distillate oil is burned are required to be kept by the Permittee and reporting is required on a semiannual basis. Deviations are primarily divided into excess emissions, exceedances, and excursions. Deviations are divided into excess emissions, exceedances, and excursions. Excess emissions would be defined in applicable standard. Excursions and other exceedances are defined in Condition 6.1.7.

Condition 6.1.4 grants the company's request to change the quarterly reporting, mandated by exiting Condition 5.3.1, to semiannual. Accordingly, Condition 6.2.7 has been rewritten to conform to this change.

B. Specific Record Keeping and Reporting Requirements

See Section 6.2 of the enclosed permit.

VII. Specific Requirements

A. Operational Flexibility

- The applicant did not request any alternative operating scenarios in Title V Application No. 15110. The permit does contain general operational flexibility conditions, however.

B. Alternative Requirements

- There are no alternative requirements that need to be incorporated into this Title V permit.

C. Insignificant Activities

- Please see Attachment B of the enclosed permit.

D. Temporary Sources

- None associated with the enclosed permit.

E. Short-Term Activities

- None associated with the enclosed permit.

F. Compliance Schedule/Progress Reports

- None associated with the enclosed permit.

G. Emissions Trading

- None associated with the enclosed permit.

H. Acid Rain Requirements

- None associated with the enclosed permit.

I. Prevention of Accidental Releases

- None associated with the enclosed permit.

J. Stratospheric Ozone Protection Requirements

- None associated with the enclosed permit.

K. Pollution Prevention

- None associated with the enclosed permit.

L. Specific Conditions

- None associated with the enclosed permit.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR 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 30-day public review started on December 22, 2005 and ended on January 21, 2006. . Comments were not received by the Division other than from J. M. Huber Corporation - Macon Plant and below is the response to each one of them:

Comment No. 1:

Page 24, Section 5.2.11 Compliance Assurance Monitoring Table

Emission point S-733 should read “#2 Spray Dryer Bucket Elevator (S-733) and not “#2 Sp Dryer Bucket Elevator”

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the Compliance Assurance Monitoring Table to reflect this minor grammatical oversight

The requested change has been made.

Comment No. 2:

Page 1, Section 1.3 Mining

The draft version of the permit indicates that slurry is pumped 4 miles from the Twiggs county mine plant to the main plant. In reality, this distance is 6 miles.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the distance listed between the Twiggs county mine plant to the main plant from 4 miles to 6 miles.

The requested change has been made.

Comment No. 3:

Page 1, Section 1.3 Overall Facility Description

The draft version of the permit does not indicate any onsite electrical generation activities as was mentioned in the previous version of permit (Page 2, section 1.3).

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the draft language in the Overall Facility Description to include the permitted power generation equipment.

The requested change has been made.

Comment No. 4:

Page 7, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for Silo #20, #21, #22, #23, #24, and #25 Railcar Loading Spouts are S-725. This bag house is actually unit #S-692

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for these 6 railcar loading spouts from S-725 to S-692 .

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 5:

Page 19, Conditions 4.2.4

Condition 4.2.4 reads, “Within 120 days after startup of any newly installed NO_x emitting units, the Permittee shall conduct testing for nitrogen oxides (NO_x) emissions for the purpose of establishing applicable NO_x emission factors for the existing NO_x emission units as identified in Tables A & B of Conditions 6.2.5 & 6.2.6.....”

This condition could as written require the J. M. Huber – Macon plant to re-test and establish new emission factors for multiple sources whenever a new unit is installed.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the wording in condition 4.2.4 to require testing and establishment of emission factors on existing NO_x sources within 120 days of permit issuance and to require further require that any newly installed source of NO_x be tested within 120 days of start-up of said newly installed source .This condition would not remove condition 5.2.9, which requires annual NO_x emission testing for all NO_x emitting units.

Condition 4.2.4 has been written to clarify the fact that it is meant to require testing to establish initial emissions factors for NO_x emitting units.

Comment No. 6:

Pages 2 and 21, Condition 5.2.2.b

Condition 5.2.2.b reads, “For each source determined to be emitting visible emissions, the Permittee shall determine whether the emissions equal or exceed the opacity action level using the procedure specified in section d of this condition.....The opacity action level is 5 percent for baghouses subject to NSPS or condition 3.2.1....”

This condition as written will require the J. M. Huber – Macon plant to take corrective actions at any opacity level, as opacity is read in 5% increments. This means that any opacity at all would trip the action level.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the wording in condition 5.2.2.b to allow for averaging to be used when an opacity event is observed. We would request that should an opacity reading of 5% be observed, that a 5 minute period where readings are taken every 30 seconds and averaged together be allowed as the final opacity determination. This average value would then be used to show if action is needed, based on this average opacity.

Condition 5.2.2b states that “the person performing the determination shall have received additional training acceptable to the Division to recognize the appropriate opacity level and the determination shall cover a period of three minutes.” In other words, visible emissions may be averaged over the three minutes period. Hence, the company’s concern is already addressed.

Comment No. 7:

Page 21, Condition 5.2.3

Condition 5.2.3 reads, "Within 60 days of the issuance of this permit, the Permittee shall develop and implement a Preventative Maintenance Program....."

This condition requires that we develop a maintenance program that conforms to the conditions a to d within this condition.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the wording in condition 5.2.3 to allow for 120 days from the issuance of this permit, rather than the 60 days present in the draft language.

The requested change has not been made because a program similar to the subject Preventative Maintenance Program is already required by condition 5.2.3 of Title V permit No. 1455-289-0001-V-01-0.

Comment No. 8:

Page 1, Condition 1.3

The first sentence of the permit reads, "The following is a description of the operations used process kaolin at this facility"

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the wording in condition 1.3 to read, "The following is a description of the operations that process kaolin at this facility."

This typographical error has been corrected.

Comment No. 9:

Various pages and conditions 5.2.4, 5.2.7, 5.2.8, and 5.2.10

These conditions require the monitoring of the fuel consumption for some of the fuel burning units at the facility. The facility has varying capabilities to monitor fuel consumption on each individual unit currently.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the wording in the referenced conditions to allow for 180 days from the issuance of this permit to meet the requirements to allow for the purchase and installation of the fuel monitoring devices.

The requested change has been made (Please note that this comment inadvertently refers to condition 5.2.4).

Comment No. 10:

Page 4, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for S-661, S-664, S667, S-670 is called S-779. In reality, the control device is numbered S-648

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for these four emission points from S-779 to S-648 .

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 11:

Page 6, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for Slurry make-down bin #4 is S-819. In reality the control device is S-821.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the Slurry make-down bin #4 from S-819 to S-821.

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 12:

Page 8, Emission Unit Listing Detail

The draft version of the permit indicates that the ID number for the Calcine pre-grinder #3 is S-756. In reality the correct ID # is S-754.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the ID for the Calcine Pre-grinder #3 from S-756 to S-754.

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 13:

Page 6, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for Slurry make-down bin #4 is S-819. In reality the control device is S-821.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the Slurry make-down bin #4 from S-819 to S-821.

This is a repetition of the request in Comment 11 above.

Comment No. 14:

Page 9, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for the Calcine one-ton bagger surge bin is S-791. In reality the control device is S-791a.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the Calcine one-ton bagger surge bin from S-791 to S-791a.

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 15:

Page 9, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for the Calcine one-ton bagger #8 is S-791. In reality the control device is S-825.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the Calcine one-ton bagger #8 from S-791 to S-825.

The requested change has been made.

Comment No. 16:

Page 9, Emission Unit Listing Detail

The draft version of the permit indicates that the control device for the 50# Bag vacuum packer #9 is S-791. In reality the control device is S-825.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the 50# vacuum packer #9 from S-791 to S-825.

The requested change has been made.

Comment No. 17:

Page 9, Emission Unit Listing Detail

The draft version of the permit indicates that the control devices for the calcine bagger (2 spout) Feed Bin #5 are S-796 and S-801. Currently the control device for this unit is S-796 only.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) change the control device for the calcine bagger (2 spout) Feed Bin #5 by eliminating the control device S-801.

J. M. Huber Corporation later requested changing this (Please see “Additional Comments” below).

Comment No. 18:

Page 23, Condition 5.2.9

The condition refers to emission units listed in Table A and B in Conditions 6.5 and 6.2.6 of this permit. This should read Condition 6.2.5, not condition 6.5.

J. M. Huber Corporation – Macon Plant respectfully requests that Georgia Environmental Protection Division (GA EPD) correct the condition to read 6.2.5, not 6.5.

The requested change has been made.

Additional Comments

In its March 15, 2006-letter, J. M. Huber Corporation – Macon Plant requested making the following revisions to Section 3.1 of its Title V permit:

Equipment Units		Air Pollution Control Devices		
ID No.	Description	ID No. Current	Description	ID No. Change
S-818	Makedown Bin #4	S-821	Baghouse	S-819
S-693	Railcar Loadout Bin	S-692	Bin Vent	S-725
S-685	Pressure Pot Air Conveyor	S-725	Bin Vent	S-686
S-701	Silo#20	S-692	Baghouse	S-703
S-704	Silo #21	S-692	Baghouse	S-706
S-707	Silo #22	S-692	Baghouse	S-709
S-713	Silo #23	S-692	Baghouse	S-715
S-717	Silo #24	S-692	Baghouse	S-719
S-761	Calcine Pre-Grinder #3	S-756	Bin Vent	S-755
S-790	Calcine One-ton Bagger Surge Bin	S-791a	Bin Vent	S-791
S-798	Calcine Bagger Feed Bin #5	S-796	Baghouse Bag Cleaner	S-796 S-801
S-802	Lime Bin		Bin Vent	S-803
S-679	Pneumatic Conveying System to Silo #11	S-661	Pneumatic Conveying System to Silo #5 (change to 11)	S661

Those changes have been made.