

Facility Name: **Thiele Kaolin Company, Sandersville Plant**

City: Sandersville

County: Washington

AIRS #: 04-13-303-00006

Application #: As Listed Below

Date SIP Application Received: See Permit Cover

Date Title V Application Received: See Permit Cover

Permit No: 3295-303-0006-V-01-1

Program	Review Engineers	Review Managers
SSPP	Hamid Yavari	Richard McDonald
SSCP	Lewis Hays	Douglas Waldron
ISMP	Deanna Oser	Ross Winne
TOXICS	n/a	n/a

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

The initial Title V Permit Number 3295-303-0006-V-01-0 was issued on December 27, 2001 based on Application TV-9274. The permit is under appeal. Thiele Kaolin Company, Sandersville continued to operate under Air Quality Permits 3295-150-3889-0 and 3295-150-58925-0 while negotiating a resolution to the appeal. Changes in this amendment are primarily for the purposes of incorporating changes to resolve the appeal, approval of changes to #1 Makedown System, removal of #4 Spray Dryer from list of sources subject to 40 CFR Part 60 Subpart UUU and update the equipment list to include the equipment installed or modified since the initial Title V permit was issued. A redlined version of the Title V Permit that was issued on December 27, 2001 is attached, showing changes that are part of this amendment.

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
3295-303-0006-V-01-0	December 27, 2001	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
3295-303-0006-V-01-0	The initial TV Permit. It has been appealed and is therefore stayed until the appeal is settled. This amendment is to resolve the appeal.

B. Regulatory Status**1. PSD/NSR/RACT**

Thiele Kaolin Company, Sandersville Plant is a major source under PSD/NSR regulations for Particulate Matter (PM), Particulate Matter less than 10 microns (PM₁₀), and Nitrogen Oxides (NO_x).

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

This amendment is for the purpose of resolving the appeal of Air Quality Permit No. 3295-303-0006-V-01-0. The amendment incorporates corrections and clarifications that Thiele Kaolin Company has agreed will sufficiently resolve their objections to the Title V permit so that they will drop their appeal. This amendment also incorporates approval of changes to #1 Makedown System, removal of #4 Spray Dryer from list of sources subject to 40 CFR Part 60 Subpart UUU and update the equipment list to include the equipment installed or modified since the initial Title V permit was issued.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Actual Emissions Increase) (tpy)	Potential Emissions Increase (tpy)
PM	✓	11.78	11.78
PM ₁₀	✓	11.78	11.78
SO ₂			
VOC			
NO _x			
CO			
TRS			
H ₂ S			
Individual HAP			
Total HAPs			

C. PSD/NSR Applicability

The modification will not be classified as a major new source or major modification for PSD.

III. Facility Wide Requirements

The issues resulting in the appeal did not involve any facility wide requirement contained in Part 2.0 of the permit.

IV. Regulated Equipment Requirements

A. Brief Process Description

Kaolin slurry at about 30% solids is pumped about 14 miles from the mines sites to the Sandersville Plant. The slurry, upon reaching the plant, is stored in large tanks. From these tanks the clay is pumped to various processes consisting of magnetic separators, attrition mills, centrifuges, and addition of leaching chemicals. The main chemicals added are sulfuric acid and sodium hypochlorite. The slurry is stored in various large storage tanks between these processes.

The next process stage is dewatering by rotary drum vacuum filters. At this stage water is removed, raising the slurry solids content to about 60% solids. The slurry is also dispersed and pH raised to about neutral with soda ash. The only air pollution control equipment to this point is a bin vent on the soda ash bin, which is filled (about every two weeks) by air conveying from a delivery truck.

From the vacuum filters the slurry is pumped to storage tanks prior to processing it for shipments. The clay is processed for shipment by three primary processes: spray drying, calcining, and raising solids content to approximately 70%.

There are four spray dryer systems at this plant: No. 2 Spray Dryer (SD2), No. 3 Spray Dryer (SD3), No. 4 Spray Dryer (SD4), and No. 5 Spray Dryer (SD5). Each of these systems produces a dry hydrous kaolin product. Each consists of a spray dryer with a natural gas furnace, which uses fuel oil only during natural gas curtailments. Each has a large multi-module fabric baghouse to control air emissions and recover product.

No. 1 Spray Dryer (SD1) is the same as those listed above except it dries kaolin for further processing by the calciners. Its product can only be air conveyed to either the 100A or 100B (calciner) silos.

There are five silos for temporary storage of dry kaolin before shipping. There are two bagging systems (one for 50 and 100 pound bags and one for 1-ton bags) for both the hydrous and anhydrous (calcined) clays. Dry kaolin is shipped from the plant either in bulk or in bags by either rail or truck transportation.

There are fugitive dust collection systems for railcar loading points.

There are two makedown systems for producing 70% solids kaolin slurry from hydrous (spray dried) kaolin. From these systems the slurry is either pumped directly into tanker trucks or rail tank cars or into temporary tanks for later loading into these conveyances. There is also a makedown system for the calciner complex.

There are two calciner systems (CA1 and CA2) with tandem spray dryers (SD6 and SD7), which use heat from calciner emissions to dry clay, which will be calcined. Associated with the calciner systems are six concrete silos and two groups of grinding mills for pre-calcined kaolin and two groups of grinding mills for post-calcined clay.

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The plant also has two 1,100 kW electrical generators, each of which is used about 40 hours per year to take advantage of lower available electrical rates.

B. Equipment List for the Process

3.1.1 Modified Emission Units

Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
BOILERS					
BO	Old boiler	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.4.3, 3.4.5, 3.4.6	---	None
B1	New boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.4.4, 3.4.5, 3.5.7	---	None
SPRAY DRYERS					
SD1	Spray dryer no. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2 391-3-1-.02(2)(g)	3.4.2, 3.4.6, 3.5.10	DC1	Baghouse
SD2	Spray dryer no. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2 391-3-1-.02(2)(g)	3.4.2, 3.4.6	DC2	Baghouse
SD3	Spray dryer no. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2 391-3-1-.02(2)(g)	3.4.2, 3.4.6	DC3	Baghouse
SD4	Spray dryer no. 4	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 40 CFR Part 52.21	3.3.3, 3.4.1, 3.4.3, 3.5.4, 3.5.6	DC4	Baghouse
SD5	Spray dryer no. 5	391-3-1-.02(2)(p)1 NSPS UUU 40 CFR Part 52.21	3.3.2, 3.3.3, 3.4.1, 3.5.4, 3.5.8, 3.5.9	DC5	Baghouse
SD6	Spray dryer no. 6	391-3-1-.02(2)(p)1 NSPS UUU	3.3.2, 3.4.1, 3.5.4, 3.5.11	HR1 DC6	Heat Recovery Scrubber Baghouse
SD7	Spray dryer no. 7	391-3-1-.02(2)(p)1 NSPS UUU	3.3.2, 3.4.1, 3.5.4, 3.5.11	HR2 DC7	Heat Recovery Scrubber Baghouse
CALCINERS					
CA1	Calciner no. 1	391-3-1-.02(2)(p)1 NSPS UUU 40 CFR Part 52.21	3.3.2, 3.3.3, 3.4.1, 3.5.5, 3.5.8, 3.5.9	HR1 DC6 Or S1A HR1	Heat Recovery Scrubber Baghouse Or Venturi Scrubber Heat Recovery Scrubber
CA2	Calciner no. 2	391-3-1-.02(2)(p)1 NSPS UUU 40 CFR Part 52.21	3.3.2, 3.3.3, 3.4.1, 3.5.5, 3.5.11	HR2 DC6 Or S2A HR2	Heat Recovery Scrubber Baghouse Or Venturi Scrubber Heat Recovery Scrubber
BAGGERS, RECEIVERS, SILOS, AND BUCKET ELEVATORS					
BE1	Spray dryer no. 2 bucket elevator	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	3.4.1	BC1	Baghouse
BE2	Spray dryer no. 3 bucket elevator	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	3.4.1	BC2	Baghouse

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Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
BE3	Spray dryer no. 4 bucket elevator	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	BC3E	Baghouse
BG3	50 lb. Bagger at #1 calciner	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	BC3	Baghouse
BG4	One ton bagger at calciner warehouse	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	BC4	Baghouse
BE4	Spray dryer no. 4 track loading bucket elevator	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	3.4.1	BC4	Baghouse
SBS1	50 lb. Bagger scavenger	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	3.4.1	CBS1	Baghouse
PC1	Silo 100B	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR1	Bin vent
PC2	Product receiver silo 200B	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR2	Baghouse
PC3	Product receiver no. 1 calciner	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR3	Baghouse
PC4	Product receiver silo 300B	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR4	Baghouse
PC5	Calciner no. 1 reject bin	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR5	Baghouse
PC6	Product receiver silo 400B	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR6	Baghouse
PC7	Silo 100A	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR7	Bin vent
PC8	Product receiver silo 200A	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR8	Baghouse
PC9	Product receiver calciner no. 2	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR11	Baghouse
PC10	Product receiver silo 300A	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR9	Baghouse
PC12	Product receiver silo 400A	391-3-1-.02(2)(p)1 NSPS OOO 40 CFR Part 52.21	3.3.1, 3.3.3, 3.4.1, 3.5.3	CR10	Baghouse
RL1	Spray dryer no. 5 railcar loading	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	DC5	Baghouse
RL2, RL3	Calciners no. 1 and no. 2 railcar loading	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	LC2	Baghouse
SLURRY SYSTEM					
SM3	Calciner slurry makedown surge bin	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	MC3	Baghouse
SM4	Slurry system silo 400A weigh belt	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	MC4	Baghouse

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ID No.	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
SM5	Slurry system silo 400B weigh belt	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	MC5	Baghouse
MILLS					
PCM1	Calciner no. 1 premills (5)	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	DC201	Baghouse
PCM2	Calciner no. 1 postmills (8)	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	DC401	Baghouse
PCM3	Calciner no. 2 premills (5)	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	DC202	Baghouse
PCM4	Calciner no. 2 postmills (8)	391-3-1-.02(2)(p)1 NSPS OOO	3.3.1, 3.4.1, 3.5.3	DC402	Baghouse
SILOS					
S1	Silo no. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2	3.4.2	SC1	Bin vent
S2	Silo no. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2	3.4.2	SC2	Bin vent
S3	Silo no. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2	3.4.2	SC3	Bin vent
S4	Silo no. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2	3.4.2	SC4	Bin vent
S5	Silo No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)2	3.4.2	SC5	Bin vent
SAG1	Atarex Grinder/Mixer	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SR22	Venturi Scrubber
SSF1	Stamlyer Feeder/Slicer (Crusher)	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	--	None
AS01	Avent Mine Silo 1	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	AV01	Bin Vent
AS02	Avent Mine Silo 2	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	AV02	Bin Vent
SH01	Big Bagging Feed Screw #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07 SV06	Bin Vent Baghouse
SH02	Bagging Bucket Elevator	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07 SV06	Bin Vent Baghouse
SH03	Existing Big Bagging Bin	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07 SV06	Bin Vent Baghouse
SH04	#1 Big Bagger – 200 lbs	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07	Baghouse
SH05	#2 Big Bagger – 200 lbs	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07	Baghouse
SH08	M1-3 50# Big Bagging Bin – 100 Tons	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SV11 SH10	Bin Vent Baghouse
SH09	Impeller Packers 1-4	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH20	Baghouse
SH13	Big Bag Reclaim Unit	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH07	Baghouse
SH14	Big Bag Reclaim Screw Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SV06 SH07	Bin Vent Baghouse
SH15	Wire Mesh Conveyor	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1, 5.2.2, 5.2.3</u>	SH10 SH20	Baghouse

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Emission Units		Specific Limitation(s)/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirement(s) / Standard(s)	Corresponding Permit Condition(s)	ID No.(s)	Description
SH16	Conveying Belt System	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1,</u> <u>5.2.2, 5.2.3</u>	SH10 SH20	Baghouse
SH17	Takeaway Reclaim Hopper	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1,</u> <u>5.2.2, 5.2.3</u>	SH10 SH20	Baghouse
SH18	Takeaway Reclaim Screw Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	<u>3.3.1, 3.4.1,</u> <u>5.2.2, 5.2.3</u>	SH10 SH20	Baghouse
SH19	Little Bag Reclaim Unit	391-3-1-.02(2)(p)1 NSPS OOO	<u>3.3.1, 3.4.1,</u> <u>5.2.2, 5.2.3</u>	SH10 SH20	Baghouse
SH21	Big Bagging Feed Screw Conveyor #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(p)1	<u>3.3.1, 3.4.1,</u> <u>5.2.2, 5.2.3</u>	SV06 SH07	Bin Vent Baghouse

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

C. Equipment & Rule Applicability

Emission and Operating Caps -

No changes are made to emission units and/or operating caps.

Applicable Rules and Regulations -

Per a request received from Thiele Kaolin Company dated June 28, 2004 and logged as Application No. 15453 Spray Dryer #4 has been removed from list of sources subject to NSPS UUU. All applicable rules and regulations covering the new emission units are already contained in the permit

D. Compliance Status

No compliance issues were reported by the facility.

E. Operational Flexibility

The issues resulting in the appeal did not involve operational flexibility issues.

F. Permit Conditions

1. Condition 3.3.1 has been updated to show the standard in units of g/dscm.
2. Condition 3.5.11 has been modified by adding propane as fuel along with natural gas. Propane was left out the original permit. According to the facility the fuel burning equipment subject to this condition were initially capable of burning both natural gas and propane.
3. Condition 5.2.1 has been amended by deleting the reference to Spray Dryer No. 4.

4. Condition 5.2.2 has been modified by adding “using procedures a through d below except when scheduling, atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Any operational day when scheduling, atmospheric conditions or sun position prevent a daily reading shall be reported as monitor downtime in the report required by Condition 6.1.4. Scheduling will prevent a daily reading if the emission unit is not in operation during the routine time period for VE checks”.

Further clarification is necessary regarding the trigger values. Concerns have been raised regarding how the VE checks should be performed that would result in VE measurements less than 5% opacity. The permit states that “the determination shall cover a period of three minutes.” However, the permit does not explicitly state how a trained observer would actually determine if the VE is below the opacity action level, and there is more than one acceptable method. For example, the VE determination could include a VE reading every 15 seconds for a duration of 3-minute. The average value would then be used to show if action is necessary based on the opacity action level.

5. Condition 5.2.3 has been modified by adding “if necessary to assure compliance”.
6. Condition 5.2.4 has been modified by removing temperature monitoring requirements for baghouses on Spray Dryers 5, 6 and 7 (DC5, DC6 and DC7). The baghouses are equipped with COM as required by the 40 CFR Part 60 Subpart UUU.
7. Condition 5.2.5 has been modified by adding, “The visible emission check may be performed on the building containing the emission unit or directly on the emission unit” to 5.2.5.a. of the permit.
8. Condition 5.2.6 has been modified by adding the term “sulfur content” and identifying what the fuel oil supplier certification shall include.
9. Condition 5.2.7 has been modified by removing fuel oil record keeping requirements for Boiler (B0), Spray Dryers SD1, SD2, SD3 and SD4.
10. Condition 5.2.8 has been modified by (1) deleting the reference to Spray Dryer No. 4 (2) adding new exceedance provision for sulfur content and amount of fuel oil fired in Boiler No. 1 (B1), Spray Dryer No. 4 (SD4), Calciner No.1 (CA1) and Spray Dryer No. 5 (SD5) and (3) adding a new exceedance provision based on operating hours for Spray Dryer No. 4 (SD4) when burning No. 2 fuel oil.
11. Condition 5.2.10 has been modified by defining arithmetic average over 2-hour period.
12. Condition 5.2.11 has been amended to assure sufficient time (i.e., 120 days) to implement all new monitoring requirements.
13. Condition 6.2.5 has been added to request submittal of a report with supporting technical information that shows the equipment installed or modified by Thiele Kaolin Sandersville Plant since 1996 will not cause or contribute to an exceedance of the PSD increment.

14. Condition 7.14.1 has been added to define when the Division shall allow excess emissions in certain cases.
15. Citation “**State Only Enforceable Condition**” has been removed from Condition 8.11.5.
16. New template condition has been added to this permit modification for **Use of Any Credible Evidence or Information**. This addition has been established as Condition 8.23.1.

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

No changes have been made to testing requirements. NSPS testing on the new equipment has been conducted.

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

Specific monitoring, record keeping and reporting requirements for each condition that has been amended are discussed as follows:

See Section IV F. of this narrative for changes to monitoring requirements.

VII. Other Record Keeping and Reporting Requirements

1. Plant wide

No changes have been made affecting this section of the permit.

2. Individual Equipment

No changes have been made affecting this section of the permit.

3. Equipment Groups

No changes have been made affecting this section of the permit.

VIII. Specific Requirements

A. Operational Flexibility

This amendment does not address or alter any operational flexibility.

B. Alternative Requirements

This amendment does not address or alter any alternative requirements.

C. Insignificant Activities

This amendment does not address or alter any insignificant activities.

D. Temporary Sources

This amendment does not address or alter any temporary sources.

E. Short-Term Activities

This amendment does not address or alter any short-term activities.

F. Compliance Schedule/Progress Reports

Section 13.00 contained in Application 16009 was signed. The certification shows that the facility believed itself to be in compliance with all applicable requirements as of the date of the certification and will continue to comply with such requirements.

G. Emissions Trading

This amendment does not address or alter any emissions trading.

H. Acid Rain Requirements

This amendment does not address or alter any acid rain requirements.

I. Prevention of Accidental Releases

This amendment does not address or alter any prevention of accidental release requirements.

J. Stratospheric Ozone Protection Requirements

This amendment does not address or alter any stratospheric ozone protection requirements.

K. Pollution Prevention

This amendment does not address or alter any pollution prevention.

L. Specific Conditions

This amendment added condition 8.23.1 to this permit.

Addendum to Narrative

The 30-day public review started on June 1, 2005 and ended on July 1, 2005. The Division did not receive any comments.