

Part 70 Operating Permit Amendment

Permit Amendment No.: **3295-303-0035-V-01-1** Effective Date: **January 7, 2004**

Facility Name: **J.M. Huber Corporation – Sandersville Plant**
530 Beck Blvd.
Sandersville, Georgia 31082 (Washington County)

Mailing Address: P.O. Box 6119
Sandersville, Georgia 31082 (Washington County)

Parent/Holding Company: J.M. Huber Corporation

Facility AIRS Number: 04-13-303-00035

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Construction and operation of an oil burner/gun with a rating of 80 MMBtu/hour on the #5 Spray Dryer (Source Code SD5). The oil burner/gun will replace an existing oil burner/gun rated at 100 MMBtu/hour. Conditions 3.5.3, 5.2.2, and 6.1.7 are amended and Condition 6.2.10 is added.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 3295-303-0035-V-01-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 13374 dated October 23, 2001 and Application No. 13282 dated September 7, 2001; any other applications upon which this Permit Amendment or Permit No. 3295-303-0035-V-01-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 3295-303-0035-V-01-0.

Assistant Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Kaolin Clay Slurry is pumped to the No. 5 Spray Dryer (Source code SD5) where it is atomized and dried by heated counter-flow air. While natural gas is the primary fuel fired in the Spray Dryer # 5, fuel oil is used as the alternate fuel. The proposed modification will include replacing the existing inefficient oil burner rated at 100 MMBtu/hour with a new efficient oil burner rated at 80 MMbtu/hour.

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PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Emission Unit (Permit Conditions column amended in Table 3.1 for source SD5)

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SD5	Spray Dryer No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)1 NSPS UUU 40 CFR Part 52.21	3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.4, 3.5.1, 3.5.2, 3.5.3, 4.2.1, 5.2.1, 5.2.2, 5.2.5, 5.3.1, 6.1.7, 6.2.1, 6.2.2, 6.2.4, 6.2.8	SD5C	Baghouse

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

- 3.5.3 The Permittee shall burn only natural gas, propane or No. 2 fuel oil in Calciner No. 5 (CS5), Spray Dryer No. 1 (SD1), Spray Dryer No. 2 (SD2), Spray Dryer No. 5 (SD5), Apron Dryer (AD1) and Boiler No. 1 through No. 5.
[40 CFR 52.21, and 40 CFR 60 Subpart Dc (391-3-1-.02(g) subsumed)]
- a. The sulfur content of the No. 2 fuel oil shall not exceed 0.5 weight percent.
 - b. The consumption of No. 2 fuel oil shall not exceed 2,700,000 gallons during any 12 consecutive month period.
 - c. The consumption of No.2 fuel oil shall not exceed 700,000 gallons during any consecutive 12 month period in Spray Dryer No. 5 (SD5) .

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i) and 40 CFR Subpart Dc, and 40 CFR 60.734(a) and (d)]

- a. A monitoring device for continuously monitoring and recording the pressure loss of the gas stream through scrubber C5C. The pressure drop-monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation.
- b. A monitoring device for continuously monitoring and recording the scrubbing liquid flow rate to scrubber C5C. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of the design scrubbing liquid flow rate.
- c. The quantity of Natural Gas, in cubic feet, and fuel oil, in gallons, burned in Boiler No. 3 (source code B3).
- d. A fuel oil consumption meter to measure fuel oil fired (in gallons) in Spray Dryer No. 5 (source code SD5).

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

6.1.7 For the purpose of the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.735(c)1, and 40 CFR 70.6(a)(3)(I)]

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Each six-minute average opacity, as recorded by the Continuous Opacity Monitoring Systems installed on the outlet of baghouse SD5C controlling emission from Spray Dryer No. 5 that exceeds 10 percent.

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- ii. For Scrubber C5C any two-hour average of the wet scrubber pressure loss that is less than 36.9 inches of water column. For the purpose of this condition, each clock hour begins a new two-hour period.
- iii. For Scrubbers C5C any two-hour average of the wet scrubber liquid flow rate that is less than 112 or greater than 168 gallons per minute. For the purpose of this condition, each clock hour begins a new two-hour period.
- iv. Any analysis of the Fuel Oil fired in any fuel burning source whose sulfur content exceeds 0.5 weight percent.
- v. Any twelve consecutive month total of fuel oil consumed that exceeds the limit defined in Condition 3.5.3(b).
- vi. Any twelve consecutive month total of fuel oil consumed in Spray Dryer No. 5 (source code SD5) that exceeds the limits in Condition 3.5.3(c).

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.10 The Permittee shall submit a written report containing the 12-consecutive month total amounts of fuel oil combusted in Spray Dryer No. 5 (source code SD5) for each semiannual period ending June 30 and December 31 of each year. The semiannual reports shall be postmarked by the 30th day following the end of the semiannual period (July 30 and January 30, respectively). The report shall consist of six 12-consecutive month totals (one 12-consecutive month total for each month in the reporting period). A 12-consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]