

Facility Name: **KaMin LLC ~ Sandersville Plant**
 City: Sandersville
 County: Washington
 AIRS #: 04-13-303-00035

Applications #: TV-17121 & TV-18154
 Date Applications Received: December 4, 2006, April 29, 2008
 Permit No: 3295-303-0035-V-02-0

Program	Review Engineers	Review Managers
SSPP	Mohamed Abdalla	Hamid Yavari
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Toxics	N/A	N/A

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 **KaMin LLC ~ Sandersville 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:

KaMin LLC ~ Sandersville Plant.

2. Parent/Holding Company Name:

KaMin LLC.

3. Previous and/or Other Name(s)

The facility used to be called Anglo-American Clays Corporation, ECC International, Sandersville Plant No. 1., IMERYYS, Sandersville Calcine Plant. The Federal Trade Commission required IMERYYS to sell some ECC's assets as part of its approval of the purchase of the latter. Thus, J. M. Huber Corporation purchased the Hydrous Operation, Apron Dryer and Calciner #5 System from IMERYYS. The facility was, then, referred to as J. M. Huber Corporation – Sandersville Plant. In April 2008 the facility was bought by KaMin LLC and is now known as KaMin LLC ~ Sandersville Plant.

J. M. Huber Corporation submitted Application No. TV-17121 upon which draft Title V permit No. 3925-303-0035-V-02-0 was issued on March 3, 2008. KaMin LLC submitted Application No. 18154, signed on April 23, 2008, for an ownership change from Huber Engineered Materials.

4. Facility Location:

530 Beck Blvd., Sandersville, GA 31082 (Washington County)

5. Attainment, Non-attainment Area Location, or Contributing Area

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

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control. However, the source of the plant's kaolin is a mine area located approximately 15 to 45 miles from the plant.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
3295-303-0035-V-01-0	June 3, 2002	Initial Title V permit.
3295-303-0035-V-01-1	October 21, 2003	Significant modification for the construction and operation of an 80 MMBtu/hour oil burner/gun on the #5 Spray Dryer (Source Code SD5). The oil burner/gun was to replace an existing oil burner/gun rated at 100 MMBtu/hour.
3925-303-0035-V-01-2 Application No. 15427 (dated June 18, 2004)	The company withdrew its request for this amendment after a draft of it was issued.	Increase fuel oil consumption limit from 2.7 to 6.9 million gallons during any 12 consecutive month period, remove the option of using propane as a backup fuel, place a limit of 0.040 grains/dscf on emissions from air pollution control devices controlling emissions from emission units not required to meet a more restrictive limit.
Off permit Change	April 29, 2002	Installation of additional degreting screen for the No. 5 Calciner feedstock operation.
Off permit Change	November 1, 2002	Installation of a heat recovery system on No. 5 Spray Dryer recirculating 2,200 g.p.m. of 150 ⁰ F water to the plant.
Off permit Change (Application No. 14955)	January 8, 2004	Installation of an exhaust fan in the facility R&D laboratory above a pulverizer used to mill calcine samples for the purposes of quality control testing. Also, modification of the drying cone of Spray Dryer No. 5 by installing a cooling chamber to reduce the contact between dried product and moist air.
Off permit Change (Application No. 15135)	March 14, 2004	Installation of two new vacuum pumps in the Filter Plant in order to increase the achievable vacuum on the filters.
Off permit Change	January 21, 2005	Modification of the drying cones of Spray Dryers No. 1 & 2 by installing a cooling chamber to reduce the contact between dried product and moist air.

D. Process Description

1. SIC Codes(s)

3295 & 1455.

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The Plant produces hydrous and calcined kaolin that are used as an additive to manufacture a variety of consumer goods, including carpet, paints and paper.

3. Overall Facility Process Description

The source of the plant's kaolin is a mine area located approximately 15 to 45 miles from the Sandersville Plant. The plant consists of two process routes: Calcining Process, where the structure of the mineral is fundamentally changed at high heat, and the Hydrous Process, where the final product is not calcined.

4. Overall Process Flow Diagram

Please see Title V permit application No. TV-17121.

E. Regulatory Status

1. PSD/NSR

The original narrative for initial Title V Permit No. 3295-303-0035-V-01-0, shows that this facility is a major source for PM, as defined by the 40 CFR Part 52.21 *Prevention of Significant Deterioration* (PSD), i. e. potential particulate matter (PM) and particulate matter less than 10 microns (PM₁₀) emissions exceed 250 tons/year (the plant is not one of the 28 listed categories and, thus, PSD major source threshold is 250 tons and not 100 tons). Also, a portion of said narrative reads as: *J. M. Huber, Thiele Kaolin, Burgess Pigment and IMERY'S Calcine plant operate within a close proximity of one another in the Sandersville area and each facility contributes to the PSD (Prevention of Significant Deterioration) increment. Because of the close proximity and magnitude of each source, J. M. Huber, Thiele Kaolin, Burgess Pigment, and IMERY'S Calcine Plant are required to submit a comprehensive PM10 increment assessment to determine compliance in the event of any significant emissions increase. However, each is a separate Title V source.*

2. Title V Major Source Status by Pollutant

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

3. MACT Standards

This facility is not subject to a MACT Standard.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
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:

None applicable.

B. Applicable Rules and Regulations

Facility-wide air quality applicable rules include the general requirements of 40 CFR 60, *New Source Performance Standards (NSPS)*, and the general provisions contained in Georgia Rule 391-3-1-.02(2)(a) which are cited, chiefly, in Section VIII of the enclosed permit.

C. Compliance Status

The facility is operating in compliance with the rules or regulations.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility processes kaolin clay.

B. Equipment List for the Process

Please see Section 3.1 of the enclosed permit.

C. Equipment & Rule Applicability

Emission and Operating Caps:

Section 3.2 of the enclosed permit establishes limits meant to avoid 40 CFR 52.21, *Prevention of Significant Deterioration of Air Quality (PSD)*. It, also, requires that fuel oil fired in any fuel-burning sources shall be limited to fuel oil numbers 1 or 2 as defined by ASTM D396, *Standard Specifications of Fuel Oils*.

In Application TV-17121, Huber Engineered Materials said that “[t]he Sandersville plant no longer burns propane as a fuel” and requested a removing it from the permit. However, I double check with the company and in an e-mail dated February 13, 2008, the company said: “the Sandersville plant does still use propane for insignificant sources such as space heaters, maintenance equipment and mobile equipment. Please leave propane listed as a fuel in condition 3.2.1a in the Title V permit.”

Condition 3.2.2 carries over the restrictions imposed by Condition 3.3.3 of permit No. 3295-303-0035-V-02-0 and it reflects the fact that the referenced limits were taken to avoid PSD (rather than being PSD Increment for PM₁₀). The Apron Dryer (AD1) along with its associated Railcar Loading (AD2) have been removed from Condition 3.2.2 because Application No. TV-17121 mentions that they’ve been decommissioned.

Rules and Regulations Assessment:

Several sources are subject to the *New Source Performance Standards* 40 CFR Part 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants* and 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*. This is in addition to 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*.

Boiler No. 3 (B3) is subject to 40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. Also, fuel burning equipment is subject to Georgia Rules 391-3-1-.02(2)(d), *Fuel-burning Equipment*, 391-3-1-.02(2)(g), *Sulfur Dioxide*, and 391-3-1-.02(2)(b), *Visible Emissions*. Condition 3.2.1 limits fuels fired in fuel-burning sources to natural gas, propane and fuel oil numbers 1 or 2 as defined by ASTM D396, *Standard Specifications of Fuel Oils*. This, impliedly, imposes a less than 0.5% limit on the sulfur content of fuel oil (i. e. this requirement will assure compliance with Georgia Rule 391-3-1-.02(2)(g)).

D. Compliance Status

The facility is operating in compliance with the rules or regulations.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 2.2.1 refers to the applicability of the federal New Source Performance Standards (NSPS) General Provisions listed in 40 CFR Part 60 Subpart A).

As shown in section 3.2, the company opted to take some emissions limits and operating standards, sometimes stricter than those mandated by NSPS, to avoid being subject to 40 CFR 52.21.

Sections 3.3 and 3.4 list the limits mandated by the federal New Source Performance Standards (NSPS) and Georgia Air Quality Control Rules.

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

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

1. Individual Equipment

Condition 4.2.2 requires conducting performance tests on each of Scrubbers SD1S, SD2S and SD5S and the measurement of the flow rate and pressure differential average values at which of compliance will be maintained. This requirement is being added to the permit because Scrubbers SD1S, SD2S and SD5S were previously not considered as control devices and testing have indicated that they are need to achieve compliance.

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 have been completed for all existing equipment. The enclosed permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment and Condition 4.2.1 is meant to require that initial performance test be performed in accordance with 40 CFR 60.8 and the applicable NSPS Subpart.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Individual Equipment:

Spray Dryer No. 5 is subject to 40 CFR 60 Subpart UUU and is controlled by Baghouse (SD5C) and Condition 3.2.1(c) limits fuel oil fired in it to no more than 700,000 gallons during any 12-consecutive month period. Subpart UUU requires that the owner or operator of an affected facility subject to the provisions of this subpart who uses a dry control device to comply with the mass emission standard shall install, calibrate, maintain, and operate a continuous monitoring system (COMS) to measure and record the opacity of emissions discharged into the atmosphere from the control device. Condition 5.2.1 deals with the required COMS and Condition 6.1.7(b)(i) defines its associated exceedance. Existing permit No. 3925-303-0035-V-01-0 requires semiannual reporting and the enclosed permit changes this to quarterly according to EPD's *Procedures for Testing and Monitoring Sources of Air Pollutants*, Part I: General Provisions, Section 1.5: Notification and Record Keeping, Paragraph (c).

Calciner No. 5 is subject to 40 CFR 60 Subpart UUU and is controlled by a Venture Scrubber (C5C). Subpart UUU requires that the owner or operator of an affected facility subject to the provisions of this subpart who uses a wet scrubber to comply with the mass emission standard for any affected facility shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. The pressure loss monitoring device must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within 5 percent of design scrubbing liquid flow rate. Condition 5.2.2 requires this monitoring and Condition 6.1.7(c)(v & vi) define the associated excursions.

On January 8, 2008, Huber Engineered Materials representatives had a conference telephone call with myself, Ms. DeAnna Oser and Mr. Dan McCain relating to proper monitoring of Scrubbers SD1S, SD2S and SD5S. Ms. Judith White (An Environmental Manager with Huber) and Mr. Richard Schwartz (President of D. R. Technology, Inc., the manufacturer) relayed the fact that the subject Scrubbers are packed towers designed to capture fine particulate matter and the paramount factor for their optimum operation is a properly maintained liquid flow rate. Pressure drop is a secondary monitoring parameter and its rise is indicative of pluggage and requires investigating the tower's interior column. Huber Engineered Materials expressed the difficulty in the hourly monitoring of

pressure differential and establishing an excursion based on a two-hour interval. Thus, it was agreed to have the company monitor the water flow rate hourly and the pressure drop weekly. Accordingly, Conditions 5.2.2(b) and 5.2.3(c) introduce new monitoring for Scrubbers SD1S, SD2S and SD5S and 6.1.7(c)vii & viii define the associated excursions.

Boiler No. 3 (B3) is subject to 40 CFR 60 Subpart Dc. Other fuel burning sources at the facility are subject to Georgia Rules (d) and (g). Condition 3.5.3(a) of the current permit limits the sulfur content of fuel oil burnt in fuel burning sources to 0.5 percent or less. Subpart Dc requires the facility to obtain fuel supplier certifications that the fuel oil is distillate oil (ASTM D396 numbers 1 and 2) for each shipment of fuel oil to be fired in a boiler subject to Subpart Dc. The enclosed permit extends this requirement to all fuel oil received at the entire facility to ensure compliance with Rule (g). Condition 5.2.3(a) & (b) requires monthly monitoring the quantities of fuels combusted in Boiler No. 3 and Spray Dryer No. 5 (This corrects an error with Condition 5.2.2(c) of the existing permit requiring continuous monitoring of the quantities of natural gas and fuel oil burned in Boiler No. 3). Condition 5.2.3(c) requires weekly monitoring of the pressure drop across each of Scrubbers SD1S, SD2S and SD5S. This requirement is being added because those Scrubbers were previously not considered as particulate matter PM₁₀ control devices and testing have indicated that they're.

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

Conditions 5.2.4 & 5.2.5 are "better worded" versions of Conditions 5.2.3 & 5.2.4 of the existing permit. Condition 5.2.4, however, excludes Apron Dryer along with its associated Railcar Loading, because Application No. TV-17121 mentions that they've been decommissioned. Condition 5.2.4 requires checking visible emissions from all baghouses (including process baghouses) controlling emissions from sources listed in Section 3.1 of the permit, and from sources added or replaced in accordance with this permit and Rule 391-3-1-.03(6). Emission units monitored using COMs and baghouses operated infrequently are exempt from this condition. Condition 5.2.4 requires visible emissions be checked at least once each day of operation and establishes opacity action levels showing when corrective action is required. The opacity action levels selected correspond to properly operated baghouses, which is an indicative of compliance with the applicable particulate matter PM₁₀ standard. 6.1.7(c)(i) & (ii) defines associated excursions. Condition 5.2.5 requires a Preventive Maintenance Program with weekly maintenance checks including pressure drop. Additionally, the monitoring described above is adopted to ensure that the sources identified in Condition 3.2.2 are in compliance with their respective limits.

Baghouses SD1C, SD2C and SD5C, which receive gases from combustion sources, are also required to monitor temperature continuously and to record all incidents when the temperature exceeds a temperature based on the maximum temperature that the bags can withstand. Also, each occurrence when the temperature at the inlet of any baghouse specified in Condition 5.2.6 exceeds the filter bag design temperature or the equivalent filter bag design temperature is an excursion (6.1.7(c)(iv)). This information is to be retained by the Permittee and must be provided upon request by the Division.

Condition 5.2.7 deals with emissions sources with no air pollution control devices and require inspection each day of operation for visible emissions and/or malfunction which might cause 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 (6.1.7(c)(iv)).

Condition 5.2.8 deals with all fuel-burning sources (boilers, dryers, and the calciner). Condition 3.2.1 limit fuels fired in fuel-burning sources to natural gas, propane and fuel oil numbers 1 or 2 as defined by ASTM D396, *Standard Specifications of Fuel Oils*. Confining fuel oil burning to and fuel oil numbers 1 or 2 effectively limits sulfur content of 0.5 weight percent which is much more stringent than Rule (g). No monitoring is required for the use of natural gas and propane because they contain negligible amounts of sulfur.

C. Compliance Assurance Monitoring (CAM)

Each emission unit controlled by a control device 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. Initially, the company claimed that all the baghouses at this facility are inherited process equipment and Scrubbers SD1S, SD2S, SD5S, rather than being control devices, are used to recover heat. On May 1, 2007, EPD held a meeting with Huber Engineered Materials representatives and the company agreed to submit a new CAM plan. As part of its July 25, 2007 correspondence, Huber Engineered Materials submitted a spreadsheet addressing the limits mandated by NSPS Subparts OOO and Georgia Rule (p). Conditions 5.2.9, 5.2.10, 5.2.11 and 5.2.12 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
Pulverizing Premill Nos. 26, 27, 28 (M26)	Particulate Matter PM ₁₀
Pulverizing Postmill Nos. 29, 31, 32, 33, 34 (M29)	
Spray Dryer No. 1 (SD1)	
Spray Dryer No. 2 (SD2)	
Spray Dryer No. 5 (SD5)	
Calciner No. 5 (C5)	
Calciner No. 5 Cooler/Conveyor (K5)	

VI. 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 information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the 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 quarterly basis.

B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1 and 6.2.2 deals with notification, reporting, and recordkeeping requirements pertaining to fuel consumption in a more concise and better-worded manner. It, also, changes the frequency of reporting from semiannual to quarterly according to EPD's *Procedures for Testing and Monitoring Sources of Air Pollutants*.

Condition 6.2.3 of the enclosed permit deals with the notification, reporting, and recordkeeping requirements of the federal NSPS (General Provisions) and Subpart OOO in a more generic format.

VII. Specific Requirements

A. Operational Flexibility

- The applicant did not request any alternative operating scenarios in Title V Application No. TV-17121. The permit does contain general operational flexibility conditions, however.

B. Alternative Requirements

- None associated with the enclosed permit.

C. Insignificant Activities

- 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. Stratospheric Ozone Protection Requirements

- None associated with the enclosed permit.

J. Pollution Prevention

- None associated with the enclosed permit.

K. 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 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.

Addendum to Narrative

KaMin LLC submitted Application No. 18154, signed on April 23, 2008, for an ownership change from Huber Engineered Materials. The enclosed permit reflects the requested change.

The public notice for Title V renewal application No. 17121 expired on April 25, 2008. Comments were received from the company and they are cited and addressed below.

Comment No. 1: *Permit Condition No.3.1 – Emission Units*

Control Device R52C and M29C are the same device. Huber requests that R52C be deleted and replaced with M29C in the table.

This change has been made.

Comment No. 2: *Permit Condition No. 4.1.3(f) - General Testing Requirements*

There are no requirements for Sulfur Dioxide testing. Huber therefore requests that this condition be removed.

The requirement for SO₂ testing has been removed.

Comment No. 3: *Permit Condition No.5.2.10 – Specific Monitoring Requirements*

The CAM plan indicates that 6 minute averages are used to calculate 3 hour averages. There is no 3 hour limit. Huber requests that the 3 hour average be removed.

Both of Spray Dryer No. 5 (SD5) and Calciner No. 5 (C5) are subject to 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*. As indicated in Condition 3.3.2(b), Subpart UUU's requirement limiting opacity to no greater than 10 percent doesn't apply when, as in the case of Calciner No. 5, a wet scrubber is used as a control device. However, Spray Dryer No. 5 employs Baghouse (SD5C) followed by Wet Scrubber (D5S) as control devices. Baghouse (SD5C) is equipped with a continuous opacity monitoring system used to ensure compliance with Subpart UUU. Nonetheless, the emissions from this baghouse are, thereafter, ducted to Wet Scrubber (D5S), which helps in achieving the 40 CFR 52.21 avoidance limit (4.700 lb/hr) placed on Spray Dryer No. 5 by Condition 3.3.2. Accordingly, and to avoid subjecting the COMS on Spray Dryer No. 5 to two different opacity requirements, the Division determined that six-minute averaging period is sufficient to ensure compliance with 40 CFR 60 Subpart UUU. Thus, requested change has been made.

Comment No. 4: *Permit Condition No. 6.1.4 – General Recordkeeping and Reporting Requirements*

This permit condition mentions quarterly reporting of excess emissions, exceedances, or excursions. Huber requests that this condition be changed to semi-annual.

According to our state monitoring requirements, quarterly reporting is required because they facility has continuous emission/opacity monitoring systems. The requested change has not been made.

Comment No. 5: *Permit Condition No. 6.2.1 – Specific Recordkeeping and Reporting Requirements*

This permit condition mentions quarterly reporting of excess emissions, exceedances, or excursions. Huber requests that this condition be changed to semi-annual.

See the response to Comment No. 4 above.

Comment No. 6: *Insignificant sources*

Please update the insignificant sources per the attached table.

The requested update has been made.

Comment No. 7: *Narrative*

Table 2 indicates that the plant is a major source for CO and VOC. Huber requests that this be changed to non-major for both pollutants.

Title V Application No. 17121 indicates that the facility potential to emit (PTE) Volatile Organic Compounds is 10 to < 25 and its PTE for Carbon Monoxide is 100 to 250. Accordingly, it is a major source for the latter and a minor one of the earlier.

Comment No. 8: In an e-mail dated May 14, 2008, Ms. Judith White (Environmental Manager with KaMin LLC), maintained that: *Condition 6.1.7 b ii refers to condition 3.2.1 b and c. There is no condition c. It should refer to 3.2.1 a and b.*

This change has been made.

Other Changes:

Conditions 5.2.2(b) and 5.2.3(c) & (d) have been revised to reduce the monitoring frequency of the scrubbing liquid flow rate to each of the Scrubbers SD1S, SD2S, SD5S from continuous to hourly.

Condition 6.1.7 has been better worded. Namely, the “s” in the word “systems” in 6.1.7(b)(i) has been removed, “discovered by” has been changed to “discovered during” in 6.1.7(c)(iv), and in the proposition “either” has been eliminated from 6.1.7(c)(vii) and 6.1.7(c)(viii).

Condition 6.1.7(c)(vii) has been revised to set the excursion level at less than 80% of the average established in the most recent performance test, add the phrase *“for the purpose of this condition, each clock hour begins a new two-hour period,”* and remove the phrase *“[t]his condition shall take effect on the date that the tests required by condition 4.2.2 are conducted or required to be conducted, whichever comes first.”*

Condition 6.1.7(c)(viii) has been revised to set excursion level at greater than 130% of the average established in the most recent performance test and remove the phrase *“[t]his condition shall take effect on the date that the tests required by condition 4.2.2 are conducted or required to be conducted, whichever comes first.”* Also, per ISMP recommendation, the stipulation saying *“and the situation is not eliminated or corrected within 24 hours of first discovering the referenced value”* has been removed.