

Facility Name: **Aladdin Mills – Antioch Road Plant**

City: Dalton

County: Whitfield

AIRS #: 04-13-313-00077

Application #: 16368

Date SIP Application Received: September 9, 2005

Date Title V Application Received: September 9, 2005

Permit No: 2273-313-0077-V-01-1

Program	Review Engineers	Review Managers
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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 referenced SIP permit to construct and operate and Section 502(b)(10) change to the Part 70 source. 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), 391-3-1-.03(2), 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 permit and is presented in the same general order as the permit amendment. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

I. Facility Description

A. Existing Permits

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2273-313-0077-V-01-0	September 26, 2000	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2273-313-0077-V-01-0	Initial Title V operating permit

B. Regulatory Status

1. PSD/NSR/RACT

This facility is an existing SM stationary source as defined under PSD/NSR regulations, with potential emissions of both SO₂ and NO_x above the applicable threshold but the facility has taken limits to avoid PSD/NSR.

The following conditions were included in the Title V permit for the purpose of avoiding PSD review:

1. No fuel shall be fired containing more than 0.5% sulfur, by weight.
2. Fuel oil fired in the steam generators, Source Code B1 and B2, shall meet the specifications for fuel oil number 2 as defined by the American Society for Testing and Materials D396-78, Standard Specification for Fuel Oils.
3. The firing of fuel oil in the 24 X 10⁶ BTU per hour boiler and the 25 X 10⁶ BTU per hour boiler shall be limited such that the total combined uncontrolled annual emission of sulfur dioxide from these boilers could not equal or exceed 250 tons. The annual consumption of fuel oil shall not exceed 0.5/S X 7,000,000 gallons. Where S is the average percentage of sulfur in the fuel.
4. The firing of fuel oil in the 72 X 10⁶ BTU per hour boilers, Source Code B1 and B2, shall be limited such that the total combined uncontrolled annual emission of sulfur dioxide could not equal or exceed 250 tons. The annual consumption of fuel oil shall not exceed 7 X 10⁶ gallons.

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	N/a			
H ₂ S	N/a			
Individual	✓			✓
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

The facility has requested approval for the operation of a 75 MMBtu/hr rental boiler. Aladdin Mills plans to use the rental boiler so that routine maintenance and repairs may be made to the facilities two existing boilers (Source Codes BL01 and BL02). The rental boiler will run with three of the existing boilers (Source Codes: BL01, BL02, BL03, and/or BL04) while the other is being serviced.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0.03	0.03
PM ₁₀	Yes	0.03	0.03
SO ₂	Yes	0.003	0.003
VOC	Yes	0.02	0.02
NO _x	Yes	0.44	0.44
CO	Yes	0.37	0.37
TRS	No	N/a	N/a
H ₂ S	No	N/a	N/a
Individual	No	N/a	N/a
Total HAPs	No	N/a	N/a

C. Title I Modification

- PSD/NSR Applicability

This modification is not subject to review under PSD or NSR.

- NSPS Modification

This modification is new construction under NSPS.

- NESHAP Modification

This modification does not constitute a modification under NESHAP.

III. Facility Wide Requirements

A. Emission and Operating Caps

There are no new or modified facility wide emission or operating caps associated with this amendment.

B. Applicable Rules and Regulations

There are no new or modified facility wide applicable rules or regulations associated with this amendment.

C. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

D. Operational Flexibility

The facility has not made an operation flexibility request for this amendment.

E. Permit Conditions

There are no new or modified facility wide permit conditions associated with this amendment.

IV. Regulated Equipment Requirements

A. Brief Process Description

There are no changes to the Process Description of the facility associated with this amendment.

B. Equipment List for the New or Modified Process(es)

There are no changes to the Regulated Equipment List associated with this amendment.

C. Equipment & Rule Applicability

There are no new or modified facility wide applicable rules or regulations associated with this amendment.

D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

E. Operational Flexibility

The facility has not made an operation flexibility request for this amendment.

F. Permit Conditions

There are no new or modified permit conditions associated with this amendment.

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

A. Individual Equipment: Not Applicable

B. Equipment Groups (all subject to the same test requirements): Not Applicable

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

- A. Individual Equipment: Not Applicable
- B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable

VII. Other Record Keeping and Reporting Requirements

Not Applicable

VIII. Specific Requirements

- A. Operational Flexibility
Not Applicable
- B. Alternative Requirements
Not Applicable

- C. Insignificant Activities
Not Applicable

- D. Temporary Sources

The facility has requested approval for the use of a rental boiler. The heat input of the rental boiler is 75 MMBtu/hour. Applicable standards include, depending on construction year, 391-3-1-.02(2)(d), 391-3-1-.02(2)(g), and 40 CFR 60 Subpart Dc. The conditions pertaining to these rules and regulations have been added to Section 7.5 of the permit.

- E. Short-Term Activities
Not Applicable

- F. Compliance Schedule/Progress Reports
Not Applicable

- G. Emissions Trading
Not Applicable

H. Acid Rain Requirements

Not Applicable

I. Prevention of Accidental Releases

Not Applicable

J. Stratospheric Ozone Protection Requirements

Not Applicable

K. Pollution Prevention

Not Applicable

L. Specific Conditions

Condition 8.26.1 was added pertaining to Creditable Evidence.