

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

Application #: TV-825721  
Date Application Received: August 6, 2024  
Permit No: 3295-303-0035-V-05-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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 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)

JM Huber Corporation, Huber Engineered Materials, LM Huber

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.

**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-04-0	February 11, 2020	Title V Permit Renewal
Off-permit change	February 14, 2020	Constructing a one-ton bag reclaim system
Off-permit change	January 12, 2021	screw conveyor addition
Off-permit change	June 7, 2023	Installation of a stationary industrial vacuum
Off-permit change	August 8, 2024	Installation of a fugitive dust collector

**D. Process Description**

1. SIC Codes(s)

3295, 1455 – Minerals and Earth, Ground or Otherwise Treated

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 inert, nonmetallic minerals, which are used as an additive to manufacture a variety of consumer goods, including carpet, paints and paper.

## 3. Overall Facility Process Description

The KaMin LLC - Sandersville 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. In addition, the plant accepts processed kaolin, which is packaged onsite. To a lesser extent, the plant can process other minerals in addition to the kaolin using the same processing equipment.

## 4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

# E. Regulatory Status

## 1. PSD/NSR

The KaMin LLC - Sandersville Plant is located in Washington County, which is designated by the US EPA as attainment for all criteria pollutants. Since the plant is not one of the 28 listed categories, the PSD threshold for this facility is 250 tpy of a criteria pollutant. Due to collocation with Thiele Kaolin, Burgess Pigment and IMERY'S Calcine plants, which have similar operations, this facility is subject to a number of PM<sub>10</sub> limits based on PSD increment modeling and is currently a major source for PSD regulations. The plant, in and of itself, is PSD major for GHG's alone.

In addition, the plant is subject to fuel limits on Spray Dryer No. 5 and a combined limit for all significant fuel burning units based on PSD avoidance.

## 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 <sub>10</sub>	Yes	✓		
PM <sub>2.5</sub>	Yes	✓		
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes	✓		
CO	Yes			✓
TRS	Yes			✓
H <sub>2</sub> S	Yes			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

## 3. MACT Standards

This facility is not subject to a MACT Standard since it is a minor source of HAPs.

## 4. Program Applicability (AIRS Program Codes)

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:**

The current Title V permit, Permit No. 3295-303-0035-V-04-0 has a limit on the discharge of any single hazardous air pollutant (HAP) which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any 12 consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any 12 consecutive months to avoid being considered a major source of HAP.

#### **B. Applicable Rules and Regulations**

Equipment subject to 40 CFR Part 60 must comply with the applicable requirements as stated in 40 CFR 60 Subpart A – “General Provisions.”

#### **C. Compliance Status**

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

#### **D. Permit Conditions**

Condition 2.1.1 limits any single hazardous air pollutant (HAP) to less than 10 tons during any 12 consecutive months, or any combination of HAPs to less than 25 tons during any 12 consecutive months. The Permittee has chosen to limit HAP emissions to avoid being considered a major source of HAP.

Condition 2.2.1 requires the facility to comply with the applicable provisions of 40 CFR 60 Subpart A – “General Provisions,” for the subject equipment.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
B3	Boiler No. 3 (Installed 1989 Capacity = 17 MMBtu)	40 CFR Part 60 Subpart Dc 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	
M26	Premill Nos. 51, 52, 53, 54 (Calciner No. 5) (Installed 1988)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 40 CFR 64	M26C	Baghouse
M29	Postmill Nos. 51, 52, 53, 54, 55, 56 (Installed 1988)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 40 CFR 64	M29C	Baghouse
H5	Calciner No. 5 Horizontal Mill (Installed 1988)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	H5C	Baghouse
SD1	Spray Dryer No. 1 (Installed 1968)	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 64	SD1C SD1S	Baghouse Wet Scrubber
SD2	Spray Dryer No. 2 (Installed 1972)	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 64	SD2C SD2S	Baghouse Wet Scrubber
SD5	Spray Dryer No. 5 (Installed 1988)	40 CFR 60 Subpart UUU 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 64	SD5C SD5S	Baghouse Wet Scrubber
C5	Calciner No. 5 (Installed 1988)	40 CFR 60 Subpart UUU 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 64	C5C	Wet Scrubber
BB2	Hydrous Big (Bagger) Hopper	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	BB2C	Baghouse
BB3	Hydrous Big Bagger Fugitive	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	BB3C	Baghouse
BB5	Bin for Calciner No. 5 Bagger	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	BB5C	Baghouse
BC1	BC1 - Hydrous Big Bagger Feed Conveyor to BC2	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC2	BC2 - Hydrous Big Bagger Feed Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BC4	BC4 - To Calciner Bagger	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC5	BC5 - Spray Dryer No. 5 Product Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC6	BC6 - Blunger No. 2 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC7	BC7 - Blunger No. 1 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC8	BC8 - Blunger No. 2 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC9	BC9 - Blunger No. 4 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC10	BC10 - Blunger No. 4 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
BC11	BC11 – Spray Dryer No. 2 Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1	None	
P6	Salt Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	P6C	Baghouse
K5	Calciner No. 5 Cooler/Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b) 40 CFR 64	K5C	Baghouse
R1	Spray Dryer No. 1 Railcar Load out	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	R1C	Baghouse
R2	Spray Dryer No. 2 Railcar Load out	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	R2C	Baghouse
R52	Bulk Loading From Silo 52	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	M29C	Baghouse
R53	Bulk Loading From Silo 53	391-3-1-.02(2)(p)1	None	
R54	Bulk Loading From Silo 54 - 57	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	R54C	Baghouse
SC1	Spray Dryer # 1 30 Ton Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	SC1C	Baghouse
SB3	Hydrous Small Bagger Fugitive	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	SB3C	Baghouse
SB4	Hydrous Small Bagger Hopper	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	SB4C	Baghouse
V1	Silo No. 1	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V1C	Bin Vent
V2	Silo No. 2	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V2C	Bin Vent
V3	Silo No. 3	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V3C	Bin Vent
V4	Silo No. 4	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V4C	Bin Vent
V5	Silo No. 5	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V5C	Bin Vent
V6	Silo No. 6	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V6C	Bin Vent
V7	Silo No. 7	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V7C	Bin Vent

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
V8	Silo No. 8	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V8C	Bin Vent
V9	Silo No. 9	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V9C	Bin Vent
V10	Silo No. 10	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V10C	Bin Vent
V51	Silo No. 51	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V51C	Bin Vent
V52	Silo No. 52	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V52C	Bin Vent
V53	Silo No. 53	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V53C	Bin Vent
V54	Silo No. 54	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V54C	Bin Vent
V55	Silo No. 55	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V55C	Bin Vent
V56	Silo No. 56	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V56C	Bin Vent
V57	Silo No. 57	391-3-1-.02(2)(p)1 391-3-1-.02(2)(b)	V57C	Bin Vent

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

**Note:** Package Boiler No. 1 (B1), Package Boiler No. 2 (B2), and Boiler No. 5 (B5) have been fully decommissioned and removed from the facility and are not included in the renewal permit.

## B. Equipment & Rule Applicability

### Emission and Operating Caps:

The facility has previously taken limits for avoidance of PSD. Condition 3.2.1 lists fuels that can be fired and limits fuel usage. Condition 3.2.2 lists the PM<sub>10</sub> limits established at the facility for the specified sources. Condition 3.2.3 limits VOC emissions from the Spray Dryer No. 1 (SD1) and Spray Dryer No. 5 (SD5). Condition 3.2.4 states the requirements for Avoidance of 40 CFR 63 JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.”

### Rules and Regulations Assessment:

#### 40 CFR 60 Subpart Dc

Boiler No. 3 (B3) is subject to 40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.” The plant complies with this standard by keeping records of fuel usage.

#### 40 CFR 60 Subpart OOO

Crushers, mills, grinders, belt conveyors, screening operations, bucket elevators, bagging operations, enclosed truck or railcar loading stations, and storage bins are subject to 40 CFR 60 Subpart OOO – “Standards of Performance for Nonmetallic Mineral Processing Plants.”



40 CFR 60 Subpart UUU

Each calciner and dryer at a mineral processing plant that commenced construction, modification, or reconstruction after April 23, 1986 is subject to 40 CFR 60 Subpart UUU – “Standards of Performance for Calciners and Dryers in Mineral Industries.” The equipment with ID No. SD5 and C5 is subject to this regulation.

40 CFR 63 Subpart JJJJJ

Since the boiler B3 at this facility are operated as “Gas-fired” boiler, it is not subject to 40 CFR 63 Subpart JJJJJ - “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers,” or any of its requirements.

Georgia Rule (b) - “Visible Emissions”

Rule (b) limits the opacity from all sources to less than 40 percent if the source is not subject to other emission limits. The opacity of emissions from a properly maintained and operated baghouse are expected to be substantially less than 40 percent.

Georgia Rule (d) - “Fuel Burning Equipment”

Rule (d) limits PM emissions from fuel burning equipment according to Btu/hr and year the equipment was built. For the equipment constructed or extensively modified after January 1, 1972, Rule (d) also limits opacity of exhaust to 20 percent, with one 6-minute period per hour of up to 27 percent. Burning clean fuels, the actual opacity is expected to be less than 10 percent.

Georgia Rule (g) - “Sulfur Dioxide”

Rule (g) limits sulfur dioxide from fuel burning sources with heat input below 100 MMBtu/hr in the fuel to 2.5 weight percent sulfur. Distillate fuel oil has a sulfur content of no greater than 0.5 weight percent, as per ASTM standards. Natural gas is inherently very low in sulfur content, so no sulfur content tracking is required for it.

Georgia Rule (p) – “Particulate Emissions from Kaolin and Fullers Earth Processes”

Rule (p) limits the PM emissions from kaolin and Fuller’s Earth processes. Georgia Rule (e) applies to the existing process equipment when processing other nonmetallic minerals. KaMin received approval in 2009 to process other inert, non-metallic minerals in addition to kaolin on the existing process equipment. Therefore, both Rule (p) and Rule (e) apply. For practical purposes, KaMin plans to comply with the more stringent Rule (p) when processing materials subject to Rule (e), so that compliance with Rule (e) would be met.

### C. Permit Conditions

Condition 3.2.1 lists the fuels that can be fired and fuel limits for PSD avoidance.

Condition 3.2.2 lists the PM<sub>10</sub> limits established at the facility for the specified sources for PSD avoidance.

Condition 3.2.3 limits VOC emission limit of 40 tpy from the Spray Dryer No. 1 (SD1) and Spray Dryer No. 5 (SD5) for PSD avoidance.

Condition 3.2.4 limiting the use of fuel oil for avoidance of 40 CFR 63 Subpart JJJJJ.

Condition 3.3.1 establishes the applicability of 40 CFR 60 Subpart OOO and includes requirements for equipment subject to the rule.

Condition 3.3.2 establishes the applicability of 40 CFR 60 Subpart UUU and includes requirements for sources subject to the rule.

Condition 3.3.3 establishes the applicability of 40 CFR 60 Subpart Dc to Boiler No. 3.

Condition 3.4.1 states the allowable rates of particulate emissions in accordance Georgia Rule (p).

Condition 3.4.2 limiting opacity to 40 percent in accordance with Georgia Rule (b).

Condition 3.4.3 limits particulate matter emissions limit for Boiler B3 in accordance with Georgia Rule (d).

Condition 3.4.4 limits sulfur content of fuel fired in the boiler, spray dryers and calciners at the facility in accordance with Georgia Rule (g).

Condition 3.4.5 limits fugitive emissions in accordance with Georgia Rule (n) to 20% opacity.

Conditions 3.5.1 and 3.5.2 require the facility to operate the particulate matter control devices at all times the associated equipment is operating and to maintain an inventory of replacement filter media.

#### **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 (or sixty (60) days for tests required by 40 CFR Part 63) 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**

Condition 4.2.1 requires the facility to conduct performance tests for any equipment which has been constructed or modified at the facility that is subject to the NSPS. The Permittee shall conduct the tests within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of equipment.

Condition 4.2.2 includes performance test requirements for affected sources subject to 40 CFR 60 Subpart OOO that were installed or modified after April 22, 2008.

#### **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**

Condition 5.2.1 requires the facility to continuously monitor the opacity at the outlet of Baghouse (SD5C) which controls PM emissions from Spray Dryer No. 5.

Condition 5.2.2 requires the facility to continuously monitor and record the pressure drop of the gas stream and the liquid flow rate through Scrubber C5C.

Condition 5.2.3 requires monitoring devices to measure and record the indicated parameters including fuel combusted, scrubbing liquid flow rates, and pressure drop.

Condition 5.2.4 requires the facility to perform daily visible emission (VE) checks.

Condition 5.2.5 requires the development and implementation of a Preventive Maintenance Program for the baghouses.

Condition 5.2.6 requires the installation of a continuous temperature monitor on the inlet of baghouses receiving gases at high temperatures from sources that dry and calcine and record the time and date of each incident when the temperature exceeds the filter bag design temperature.

Condition 5.2.7 requires inspection of all emission points for the specified emission units for which no air pollution control device is installed. The condition includes requirements to take corrective action and keep records.

Conditions 5.2.8, 5.2.9, 5.2.10, 5.2.11, and 5.2.12 list the specific emissions units and performance criteria for sources that are subject to Compliance Assurance Monitoring (CAM).

### C. Compliance Assurance Monitoring (CAM)

CAM requirements from the existing Title V permit, Permit No. 3295-303-0035-V-03-0, are carried over into this Title V permit without any changes.

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. Specifically, the following pollutant specific emission units (PSEU) were found to be subject to the Compliance Assurance Monitoring:

Emission Unit	Control Device	Pollutant
Pulverizing Premills No. 51, 52, 53, 54 (M26)	Baghouse (M26C)	Particulate Matter PM <sub>10</sub>
Pulverizing Postmills No. 51, 52, 53, 54, 55, 56 (M29)	Baghouse (M29C)	
Spray Dryer No. 1 (SD1)	Baghouse (SD1C) Scrubber (SD1S)	
Spray Dryer No. 2 (SD2)	Baghouse (SD2C) Scrubber (SD2S)	
Spray Dryer No. 5 (SD5)	Baghouse (SD5C) Scrubber (SD5S)	
Calciner No. 5 (C5)	Scrubber (C5CS)	
Calciner No. 5 Cooler/Conveyor (K5)	Baghouse (K5C)	

Conditions 5.2.8, 5.2.9, 5.2.10, 5.2.11, and 5.2.12 contain the applicable Compliance Assurance Monitoring (CAM) requirements.

## **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 or semiannual] basis.

### **B. Specific Record Keeping and Reporting Requirements**

Condition 6.2.1, stating the reporting requirements regarding fuel consumption, has been changed from quarterly to semiannual reporting. A review of the regulations and equipment show that only semiannual reporting is required.

Condition 6.2.2 contains emission factors for demonstrating compliance with the limits in Condition 2.1.1. The HAP emissions from calcining are quantified by using the HCl and HF emission factors established during the most recent performance test and the maximum capacity of 9 tons per hour for Calciner #5.

Condition 6.2.3 requires the facility to comply with the applicable notification, reporting, and recordkeeping requirements in the “General Provisions” of 40 CFR Subpart 60, 40 CFR 60 Subpart OOO, and 40 CFR 60 Subpart UUU.

Condition 6.2.4 requires the facility to maintain a record of all actions taken in accordance with Condition 3.4.5 to suppress fugitive dust.

Condition 6.2.5 requires the facility to maintain separate monthly usage records of all hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) containing materials and each type of fuel burned in fuel-burning sources and Calciners to comply with avoidance limits.

Condition 6.2.6 requires the facility to calculate the monthly and twelve consecutive month totals of individual hazardous air pollutants (HAPs) and total hazardous air pollutants (HAPs), and the sum of volatile organic compounds (VOCs) emissions from Dryer No. 1 (SD1) and S pray Dryer No. 5 (SD5) to demonstrate compliance with the avoidance limits.

Condition 6.2.7 requires the facility to keep records of the fuel oil fired in Boiler B3 for avoidance of 40 CFR 63 Subpart JJJJJ.

Condition 6.2.8 requires the facility to keep records of fuel oil combusted and fuel oil supplier certifications.

**VII. Specific Requirements****A. Operational Flexibility**

Not applicable

**B. Alternative Requirements**

Not applicable

**C. Insignificant Activities**

See Permit Application on GEOS website.  
See Attachment B of the permit

**D. Temporary Sources**

Not applicable

**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. Stratospheric Ozone Protection Requirements**

Not applicable

**J. Pollution Prevention**

Not applicable

**K. Specific Conditions**

Not applicable

**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.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

**Addendum to Narrative**

The 30-day public review started on November 13, 2024 and ended on December 13, 2024. No comments were received by the Division. No change was made to the draft renewal permit.