Facility Name: **J.M. Huber Corporation – Fairmount**
City: Fairmount
County: Gordon
AIRS #: 04-13-129-00028

Application #: TV-798642
Date Application Received: January 8, 2024
Permit No: 3295-129-0028-V-08-0

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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: J.M. Huber Corporation – Fairmount

2. Parent/Holding Company Name

   J.M. Huber Corporation

3. Previous and/or Other Name(s)

   None

4. Facility Location

   187 Gordon Street Fairmount, Georgia 30139

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

   The facility is located in an area designated as attainment 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
3295-129-0028-V-07-0	August 6, 2019	Title V Renewal
Off- Permit Change	February 4, 2020	Redesign the deagglomerating process and upgrade the chemical injection system, expansion hopper, and dust collector in the batch blender process.
Off- Permit Change	June 16, 2020	Addition of a new bin vent to control emissions from the existing East Crude (ATH) Silo. Plant 1 has 3 ATH Crude Silos (SP09) and each will be controlled by its dedicated bin vent (BH12a, BH12b& BH12c).
Off- Permit Change	August 18, 2022	Moved exhaust point outside building.

D. Process Description

1. SIC Codes(s)

3295

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 facility processes Aluminum Trihydrate and Magnesium Hydroxide.

3. Overall Facility Process Description

The facility consists of Plant No. 1, Plant No. 2 and Plant No. 3 – Micral Dryer Process, Plant No. 4 – Magnesium Hydroxide. Aluminum Trihydrate (ATH) is processed into a filler product with fire-retardant properties and is used in plastics, carpet and insulator manufacturing. The raw material is completed dry and has an average size of about 60 microns. The raw ATH is received by bulk rail and pneumatically conveyed to one of three crude storage silos.

Plant No. 1 consists of a Roller Mill, which reduces the ATH to particle sizes ranging from 10 to 29 microns. The ground product can be bagged (50 lb or 1-ton bags), stored for later bulk loading to trucks, blended with performance enhancers, or conveyed to Plant No. 2 for ultra fine grinding.

Plant No. 2 consists of three grinding mills equipped with two air classifiers per mill. Each classifier is connected to 3 baghouses. The grinding mills utilize a ceramic media for grinding. A screening operation separates the media and product after milling. The finished product can be bagged (50 lb or 1-ton bags), stored for later bulk loading to trucks or railcars, blended with low levels of performance enhancers, or conveyed to one of three mill screeners.

Plant No. 3 consists of the Flash Dryer 1 process and receives ATH from the Plant 1 Roller Mill. The ground material is metered to the slurry make-down /wet milling process for blending and milling as needed. A rotary vacuum reduces the moisture content, and the filtered material is dried in a flash dryer. After drying, the material is fed to a deagglomerating mill. The finished product is stored in a silo prior to bagging or bulk loading to trucks or railcars. Baghouses control particulate matter emissions from the blenders, silos, dryers and deagglomerating mills.

Plant No. 4 consists of the Magnesium Hydroxide process, which is similar to the Plant 3 Flash Dryer process. Magnesium Hydroxide slurry is received at the facility and offloaded. The slurry is screened and sent to a Flash Dryer, where the material is dried. Upon drying, the material is classified to separate the fine material from the course material. Both product classifications are then treated with low levels of performance enhancers. The dried, classified and surface treated product is conveyed into product storage silos and ultimately transferred to bagging silos. The material is bagged in 50 lb. bags or supersacks and stored in an on-site warehouse until shipment to a customer.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

J.M. Huber Corporation – Fairmount is a non-major source under PSD. The facility previously accepted a 250 tpy limit on volatile organic compounds (VOC) emissions to avoid classification as a PSD major source. The permit also contains PSD avoidance limits for particulate matter (PM) emissions from the affected sources. Potential emissions for SO_2, NOx, and CO are less than 250 tpy.

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	✓		
$PM_{2.5}$	Yes	✓		
SO_2	Yes			✓
VOC	Yes	✓		
NO_x	Yes			✓
CO	Yes			✓
TRS	N/A			
H_2S	N/A			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

The facility is not a major source of HAP emissions. The facility is subject to all applicable provisions of the following area source standards:

40 CFR 63 Subpart CCCCCC – "National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities"

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	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Emission and Operating Caps for this renewal permit are based on the requirements for the emission units as permitted in existing Permit No. 3295-129-0028-V-07-0 as discussed below.

The facility has a taken a facility wide limit of 250 tons of VOC during any 12 consecutive months for PSD avoidance. The facility previously requested that the VOC limit be lowered to 240 tons of VOC during any 12 consecutive months.

The facility 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. J.M. Huber previously requested this limit to avoid MACT.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility has not indicated any non-compliance issues.

D. Permit Conditions

The permit conditions have been carried over into this Title V renewal permit without any changes.

Condition 2.1.1 limits VOC emissions to 240 tpy for PSD avoidance.

Condition 2.1.2 limits HAP emissions below the 10/25 tpy major source thresholds for MACT avoidance.

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
Plant 1 – Unloading and Storage				
SP10	PLT.1 Crude Unloading System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH13	Baghouse
SP09	PLT.1 Crude Silos	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH12a BH12b BH12c	Baghouse
SP06	PLT.1 Surge Tanks	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH09	Baghouse
Plant 1 – Mill System				
SP01	PLT.1 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH01 BH02	Baghouse
SP02	PLT.1 Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH03 BH04 BH05	Baghouse
SP114	PLT.1 New Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	BH114	Baghouse
Plant 1 – Finished Product				
SP07	PLT.1 Silo C	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH10	Baghouse
SP08	PLT.1 Silo F	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH11	Baghouse
SP53	PLT.1 Bulk Silo 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH63	Baghouse
SP03	PLT.1 Bulk Silo 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH06	Baghouse
SP54	PLT.1 Bulk Silo 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH64	Baghouse
SP04	PLT.1 Bulk Silo 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH07	Baghouse
SP23	PLT.1 Silo 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH40	Baghouse
SP24	PLT.1 Silo 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH41	Baghouse
SP05	PLT.1 Bulk West	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH08	Baghouse
SP55	PLT.1 Bulk East (Bulk Silo #5)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH65	Baghouse
SP50	PLT.1 Blend System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH114 BH115	Baghouse
Plant 2 – Unloading and Loading Operations				
SP34	PLT.2 Crude Unloading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH50	Baghouse
SP33	PLT.2 South Bulk Loading	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH49	Baghouse
SP44	PLT.2 D Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH59	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SP51	PLT.2 Blend System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH44	Baghouse
SP71	PLT.2 Air Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH71	Baghouse
Plant 2 – Filter/ Receiver				
SP32	PLT.2 Mill 1 Scalping Screen	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH42-48	Baghouse
SP37	PLT.2 Mill 1 Scalping Screen	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH42-48	Baghouse
SP52	PLT.2 Mill 1 Scalping Screen	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH42-48	Baghouse
Plant 2 – No. 1 Mill System				
SP11	PLT.2 Silo A	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH14	Baghouse
SP12	PLT.2 Ultrafine Mill 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH15 BH16	Baghouse
SP13	PLT.2 Mill 1 - Rotor #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH17 BH18 BH19	Baghouse
SP14	PLT.2 Mill 1 - Rotor #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH20 BH21 BH22	Baghouse
Plant 2 – No. 2 Mill System				
SP15	PLT.2 Silo B	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH23	Baghouse
SP16	PLT.2 Ultrafine Mill 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH24 BH25	Baghouse
SP17	PLT.2 Mill 2 - Rotor #3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH26 BH27 BH28	Baghouse
SP18	PLT.2 Mill2 - Rotor #4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH29 BH30 BH31	Baghouse
Plant 2 – No. 3 Mill System				
SP19	PLT.2 Silo C	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH32	Baghouse
SP20	PLT.2 Ultrafine Mill 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH33	Baghouse
SP21	PLT.2 Mill 3 - Rotor #5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH34 BH35 BH36	Baghouse
SP22	PLT.2 Mill 3 - Rotor #6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH37 BH38 BH39	Baghouse
SP25	PLT.2 Silo 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH42	Baghouse
SP26	PLT.2 Silo 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH43	Baghouse
SP27	PLT.2 Silo 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH44	Baghouse
SP28	PLT.2 Silo 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH45	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SP29	PLT.2 Silo 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH46	Baghouse
SP30	PLT.2 Silo 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH47	Baghouse
SP31	PLT.2 Silo 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH48	Baghouse
Plant 3				
SP35	PLT.3 500 lb Batch Blender	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH51	Baghouse
SP36	PLT.3 3000 lb Batch Blender	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH52	Baghouse
SP38	PLT.3 Micral Silo 11	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH53	Baghouse
SP39	PLT.3 Flash Dryer #3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH54	Baghouse
SP41	PLT.3 Micral Silo 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH56	Baghouse
SP42	PLT.3 Batch Blender Bagger Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH55	Baghouse
SP43	PLT.3 Batch Blender Bag Dump	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH58	Baghouse
SP45	PLT.3 Silo 20 (Dow Silo)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH60	Baghouse
Plant 4 – Magnesium Hydroxide				
SP100	PLT.4 Silo 14	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH100	Baghouse
SP101	PLT.4 Flash Dryer #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	BH101	Baghouse
SP102	PLT.4 Vertex 60 Silo #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH102	Baghouse
SP103	PLT.4 Flash Dryer #2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	BH103	Baghouse
SP104	PLT.4 Deagglomerating Unit #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH106-109	Baghouse
SP105	PLT.4 South Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH106	Baghouse
SP106	PLT.4 North Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH107	Baghouse
SP107	PLT.4 Bagging Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH108	Baghouse
SP108	PLT.4 Super Sack Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH109	Baghouse
SP110	PLT.4 Vertex 60 Silo #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH105	Baghouse
SP111	PLT.4 Vertex 100 #1 Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH111	Baghouse
SP112	PLT.4 Classifier	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH112	Baghouse
SP113	PLT.4 Vertex 60HST Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH113	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
Plant 5 - Packaging				
SP116	PLT.5 Packaging	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	n/a	n/a
Peaking Power Generators				
PG01	Peaking Power Generator #1	40 CFR 1039 391-3-1.02(2)(g) 391-3-1.03(2)(c)	n/a	n/a
PG02	Peaking Power Generator #2	40 CFR 1039 391-3-1.02(2)(g) 391-3-1.03(2)(c)	n/a	n/a
Gasoline Dispensing Facility				
GDF	Gasoline Dispensing Facility	40 CFR 63 Subpart A 40 CFR 63 Subpart CCCCCC	n/a	n/a

Note: The emission unit descriptions have been updated as proposed in the renewal application.

B. Equipment & Rule Applicability

Equipment and Rule Applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 3295-129-0028-V-07-0 as discussed below. A gasoline dispensing facility (GDF), subject to 40 CFR 63 Subpart CCCCCC – "NESHAP for Area Sources: Gasoline Dispensing Facilities," has been included in this Title V renewal application.

Emission and Operating Caps:

Condition Nos. 3.2.1 and 3.2.2 of the current permit contain PSD avoidance limits. These conditions contain limits for particulate matter emissions.

Rules and Regulations Assessment:

<u>40 CFR 63 Subpart CCCCCC – NESHAP for Area Sources: Gasoline Dispensing Facilities</u>
This rule regulates HAP emissions from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) at area sources. The GDF at the plant has a monthly gasoline throughput well below 10,000 gallons, therefore it is required to comply with the work practice requirement and record the gasoline throughput. The plant will comply with the requirements under Subpart CCCCCC.

<u>391-3-1.02(2)(b) – Visible Emissions</u>
This rule limits opacity from emission points and structures to 40 percent, except in cases where another rule or regulation applies a more stringent requirement. Properly operated baghouses will ensure compliance with the 40 percent opacity limit.

<u>391-3-1.02(2)(d) – Fuel-Burning Equipment</u>
This rule applies to the boilers. This rule does not affect the dryers because the rule specifically applies only to indirect heat sources such as boilers and furnaces. There is only one small boiler in use at J.M. Huber-Fairmount rated at 2.1 MMBTU/hr, and fires natural gas only. Based on those criteria, this boiler has a PM limit of 0.5 lbs/ MMBTU. This rule also limits opacity to 20 percent except for one six minute period per hour of not more than 27 percent opacity.

391-3-1.02(2)(e) - Particulate Emission from Manufacturing Processes

Rule (e) applies to all processes that emit particulate matter and are not covered by a more specific rule or regulation. PM emissions are limited according to the formulas: $E = 4.1P^{0.67}$ and $E = 55P^{0.11}$ - 40, where E equals the allowable emission rate in pounds per hour and P equals the process input weight rate in tons per hour.

391-3-1.02(2)(g) – Sulfur Dioxide

This rule limits the sulfur content of the fuels used in combustion to 2.5 percent by weight. The dryers, boilers, and generators are subject to this rule. Compliance with this rule is expected since the fuel contains less than 0.5 percent sulfur.

Operated as "nonroad engines," both diesel engine-powered generators PG01 and PG02 and their like-for-like replacements if applicable, are subject to applicable emission standards and operating requirements of 40 CFR Part 1039 - "Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines," and 40 CFR 1068.30 of 40 CFR Part 1068 – "General Compliance Provisions for Highway, Stationary, and Nonroad Programs." The facility is required to demonstrate via certification or performance testing that these generators including their like-for-like replacements if applicable are in compliance with the applicable emission standards under 40 CFR 40 CFR Part 1039, Subpart B per 40 CFR 1039.1.

According to the definition in 40 CFR 1068.30, a nonroad engine is any internal combustion engine:

(1) The engine is used in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers).

(2) By itself or in or on a piece of equipment, the engine is portable or transportable, meaning the engine is designed to be and capable of being carried or moved from one location to another. Indications of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform, and

(3) The engine remains at a location for no more than 12 consecutive months.

Please note, "EPA has migrated regulatory requirements for these engines from 40 CFR Part 89 to 40 CFR part 1039, with additional testing and compliance provisions in 40 CFR parts 1065 and 1068. The Tier 1, Tier 2, and Tier 3 standards originally adopted in this part are identified in 40 CFR part 1039, appendix I."

Nonroad engines do not meet the definition of a stationary engine under 40 CFR 60 Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" and 40 CFR 63 Subpart ZZZZ - "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines." Therefore, the generators will not be subject to NSPS or NESHAP standards. For the same reason, these generators are not subject to Georgia Rule 391-3-1-.02(2)(mmm) - "NOx Emissions from Stationary Gas Turbines and Stationary Engines used to generate Electricity."

C. Permit Conditions

The permit conditions have been carried over into this Title V renewal permit without any changes except as noted below.

Conditions 3.2.1 and 3.2.2 limit particulate matter to less than 0.02 grains/dscf and 0.04 grains/dscf from each identified source for PSD avoidance. These conditions have been updated to list each emission source.

Condition 3.2.3 limits the two generators PG01 and PG02 to 500 hours during any 12 consecutive month period.

Condition 3.2.4 requires that both generators PG01 and PG02 operate as "nonroad engines" as defined in 40 CFR Part 1039.

Condition 3.3.1 requires the facility to demonstrate that both generators PG01 and PG02 are certified for compliance with the applicable emission standards of 40 CFR Part 1039.

New Condition 3.3.2 establishes the applicability of 40 CFR 63 Subpart CCCCCC to the Gasoline Dispensing Facility (GDF) at the site.

New Condition 3.3.3 requires the facility to calculate the monthly throughput of gasoline in accordance with 40 CFR 63 Subpart CCCCCC.

New Condition 3.3.4 requires the facility to operate and maintain the GDF with good air pollution control practices to minimize emissions in accordance with 40 CFR 63 Subpart CCCCCC.

New Conditions 3.3.5 and 3.3.6 list measures the facility must take for proper handling to minimize vapor releases to the atmosphere in accordance with 40 CFR 63 Subpart CCCCCC.

Condition 3.4.1 limits PM emissions from the specified sources in accordance with Georgia Rule (e).

Condition 3.4.2 limits the opacity from the specified units in accordance with Georgia Rule (b).

Condition 3.4.3 limits the sulfur content of the fuel in accordance with Georgia Rule (g).

Conditions 3.5.1 and 3.5.2 require the facility to operate the baghouses at all times the associated equipment is operating to control PM emissions and to maintain an inventory of replacement filter bags.

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

Not applicable.

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

Monitoring requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 3295-129-0028-V-07-0. The permit conditions have been carried over into this Title V renewal permit without any changes except as noted.

Condition 5.2.1 requires monitoring the temperature and pressure drop of baghouses.

Condition 5.2.2 requires performing a check visible emission of baghouses and recording in log suitable for inspection or submittal.

Condition 5.2.3 requires implementation of a Preventive Maintenance Program for the baghouses.

Condition 5.2.4 requires installation of temperature monitors on the inlet of each of the baghouses BH01, BH02, BH54, BH103, BH101 and BH114.

Conditions 5.2.5 and 5.2.6 contain the applicable Compliance Assurance Monitoring (CAM) requirements

C. Compliance Assurance Monitoring (CAM)

CAM requirements from the existing Title V permit, Permit No. 3295-129-0028-V-07-0, are carried over into this Title V permit without any changes without any changes except as noted.

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 (ID No. & Description)	Pollutant
SP01 PLT.1 Raymond Mill	Particulate Matter
SP02 PLT.1 Classifier	
SP07 PLT.1 Silo C	
SP08 PLT.1 Silo F	
SP23 PLT.1 Silo 6	
SP24 PLT.1 Silo 5	
SP12 PLT.2 Ultrafine Mill 1	

Emission Unit (ID No. & Description)	Pollutant
SP13 PLT.2 Mill 1 - Rotor #1	
SP14 PLT.2 Mill 1 - Rotor #2	
SP16 PLT.2 Ultrafine Mill 2	
SP17 PLT.2 Mill 2 - Rotor #3	
SP18 PLT.2 Mill 2 - Rotor #4	
SP20 PLT.2 Ultrafine Mill 3	
SP21 PLT.2 Mill 3 - Rotor #5	
SP22 PLT.2 Mill 3 - Rotor #6	
SP25 PLT.2 Silo 1	
SP26 PLT.2 Silo 2	
SP27 PLT.2 Silo 3	
SP28 PLT.2 Silo 4	
SP29 PLT.2 Silo 7	
SP44 PLT.2 D Silo	
SP71 PLT.2 Air Mill	
SP39 PLT.3 Flash Dryer #3	
SP101 PLT.4 Flash Dryer #2	
SP103 PLT.4 Flash Dryer #1	
SP110 PLT.4 Vertex 60 Silo #1	
SP114 PLT.1 New Dryer	

Conditions 5.2.5 and 5.2.6 contain the applicable Compliance Assurance Monitoring (CAM) requirements. The emission unit descriptions in Condition 5.2.5 have been updated as proposed in the renewal application.

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 semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Recordkeeping and reporting requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 3295-129-0028-V-07-0. The permit conditions have been carried over into this Title V renewal permit without any changes except as noted.

Conditions 6.1.7 b.i. – iv. state the reportable exceedances for the specified HAP, VOC, and sulfur content limits.

Conditions 6.1.7 c.i. – iii. state the reportable excursions for specified sources.

Condition 6.1.7 d.i requires reporting instances when the generators remain onsite for more than 12 consecutive months. New Condition 6.1.7 d.ii. requires reporting the monthly gasoline throughput of the Gasoline Dispensing Facility (GDF) for each month during the semi-annual reporting period.

Condition 6.2.1 requires maintaining monthly usage records of all materials containing volatile organic compounds.

Condition 6.2.2 requires calculating total monthly VOC emissions and notifying the Division if monthly VOC emissions exceed 20 tons.

Condition 6.2.3 requires calculating the twelve month rolling total VOC emissions for each month and notifying the Division if the twelve month rolling VOC emissions equal or exceed 240 tons during any calendar month.

Condition 6.2.4 requires maintaining monthly records of all materials containing one or more listed hazardous air pollutants.

Condition 6.2.5 requires calculating total monthly emissions of each listed hazardous air pollutant.

Condition 6.2.6 requires calculating the twelve month rolling total emissions of each listed hazardous air pollutant and provide notifications as required to demonstrate compliance with the 10/25 tpy HAP limit.

Conditions 6.2.7, 6.2.8, and 6.2.9 establish recordkeeping requirements ensuring the generators are in compliance with the fuel sulfur content and the annual operating time limits.

Condition 6.2.10 requires the Permittee to keep the installation and removal records for the generators and their replacements.

Condition 6.2.11 requires compliance certifications for the generators.

New Condition 6.2.12 contains the recordkeeping requirements for the Gasoline Dispensing Facility (GDF) to ensure compliance with the operational limitations and requirements in Conditions 3.3.2, 3.3.3, 3.3.4, 3.3.5 and 3.3.6.

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 December 18, 2024 and ended on January 16, 2025. Comments were not received by the Division. The EPA 45 day review period ended on February 1, 2025. No comments were received.