Facility Name: **KaMin LLC – Toddville Plant**
City: McIntyre
County: Wilkinson
AIRS #: 04-13-319-00013

Application #: TV-807444
Date Application Received: February 21, 2024
Permit No: **3295-319-0013-V-06-0**

| Program | Review Engineers | Review Managers |
|---|---|---|
| **SSPP** | Mohamed Abdalla | Hamid Yavari |
| **ISMU** | Josh Pittman | Dan McCain |
| **SSCP** | Tara Jones | Sean Taylor |
| **Toxics** | n/a | n/a |
| **Permitting Program Manager** | | Steve Allison |

## 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 – Toddville Plant.

2. Parent/Holding Company Name

   KaMin LLC.

3. Previous and/or Other Name(s)

   Engelhard Corporation-Toddville Plant, BASF Catalysts LLC – Toddville Plant.
   BASF Corporation, Toddville Plant.

4. Facility Location

   1277 Dedrick Road
   McIntyre, Georgia 31054, (Wilkinson County)

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

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

B. Site Determination

KaMin purchased the Toddville plant and acquired all existing assets from BASF Corporation (BASF). The Toddville plant is co-located with the KaMin Daveyville plant. Both plants have historically been considered one facility for the purposes of permitting and will be collectively referred to as the Toddville plant. The Toddville plant is also co-located with KaMin's Edgar Plant and BASF's Edgar Plant, both of which are operating under separate Title V permits No. 3295-319-0034-V-01-0 and 3295-319-0009-V-04-0 respectively). With KaMin's acquisition of the BASF Toddville plant, the KaMin Toddville and KaMin Edgar plants now share common control, have the same NAICS code and are located on adjacent properties. Therefore, these two facilities are now considered one source with respect to New Source Review (NSR) and Prevention of Significant Deterioration (PSD) programs, operating under separate Title V permits. The KaMin Toddville plant and BASF Edgar plant are on adjacent properties but are owned by separate companies that do not share equipment or workforce. Therefore, these two facilities do not meet the definition of common control and are not considered a single source for the purposes of air permitting. New Permit No. 3295-319-0013-V-05-0 was issued, on January 24, 2023, to change the company name to KaMin LLC – Toddville Plant which is located on contiguous or adjacent property with KaMin LLC, Edgar Plant (AIRS No. 319-00034). The Toddville Plant and Edgar Plant are considered one site for the purposes of PSD/NSR and Title V rules. Each separate facility holds its own Title V permit and will be accountable, for compliance purposes, for the individual emissions units operated by each facility.

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 |
|---|---|---|
| 3295-319-0013-V-04-0 | September 20, 2019 | Title V renewal issued to BASF Corporation, Toddville Plant. |
| 3295-319-0013-V-05-0 | January 24, 2023 | New permit issued in response to Administrative Amendment to change the company name to KaMin LLC – Toddville Plant. |

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 kaolin.

3. Overall Facility Process Description

KaMin LLC – Toddville Plant operates kaolin clay mining and processing operations in Middle Georgia. The Toddville plant is located in McIntyre, Georgia, which is in Wilkinson County. The Toddville Title V application includes the Daveyville plant because it is adjacent to the Toddville plant. The Toddville and Daveyville plants are comprised of various kaolin clay processing operations including wet processing (fractionation, leaching, filtration, magnet, and ozonation), drying, milling, intermediate and final product conveying and storage, bagging, and bulk loading. KaMin LLC – Toddville Plant operates three general mining operations in the Middle Georgia area. One is located in Washington County and two are located in Wilkinson County. The crude clay is mined out of the ground and hauled by trucks to blungers. The clay is dispersed and then degritted to remove residue. The dispersed slurry is then pumped six or more miles to the plant.

The clay slurry is received from the mines and kept separate by the type of clay. During the wet processing stage, the clay can be centrifuged, delaminated, ozonated, floated, magnetically separated, and/or bleached. The clay is rotary vacuum filtered to dewater the slurry. The dewatered slurry is spray dried. The Toddville plant has five spray dryers. The spray dryers burn natural gas with #2 fuel oil as a backup. The spray dryer dries the clay to about 1% moisture. A portion of the dried kaolin is added to dewatered slurry and shipped as high solids slurry. The remaining dried clay is either bagged, bulk loaded, or pulverized. The pulverizer is used to grind the clay to a particular particle size distribution before bagging or bulk loading. The dried clay is stored in silos prior to bagging or bulk loading operations. There are approximately 40 bins or silos in Daveyville and Toddville. The bagging operation consists of 50 or 55 pound bags. The bags are stacked on pallets to prepare them for shipment. There are two baggers in Toddville. The big bagging operation consists of one ton bags. There are three big bagging operations. There are four bulk loading facilities in Toddville, which can load railcars or trucks. Two boilers in Daveyville which are used for the rotary-vacuum filtration process. Another boiler is used to further dewater slurry.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The plant is presently classified as a major stationary source as defined by federal *Prevention of Significant Air Quality Deterioration* (PSD) regulation, 40 CFR 52.21. Specifically, it has the potential to emit more than 250 tons per year of particulate matter and PM10 (particulate matter less than or equal to 10 micrometers aerodynamic diameter).

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 | ✓ | ✓ | | |
| $PM_{10}$ | ✓ | ✓ | | |
| $PM_{2.5}$ | ✓ | ✓ | | |
| $SO_2$ | ✓ | ✓ | | |
| VOC | ✓ | | | ✓ |
| $NO_x$ | ✓ | ✓ | | |
| CO | ✓ | | | ✓ |
| TRS | ✓ | | | |
| $H_2S$ | ✓ | | | |
| Individual HAP | ✓ | | | ✓ |

| 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 |
| Total HAPs | ✓ | | | ✓ |

3. MACT Standards

This facility is not major for HAPs and not subject to any proposed or final MACT Standards.

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

The general requirements of 40 CFR 60, *New Source Performance Standards* (NSPS), are referred to in this section.

C. Compliance Status

Application No. TV-807444 indicates the facility is operating in compliance with the rules and regulations.

D. Permit Conditions

Condition 2.2.1 refers to the applicable NSPS general provisions.

## III. Regulated Equipment Requirements

A. Equipment List for the Process

## B. Equipment & Rule Applicability

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|---|---|---|---|---|
| **ID No.** | **Description** | | **ID No.** | **Description** |
| **Fuel Burning Equipment** | | | | |
| 98 | 8D Boiler | 391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g) | None | N/A |
| 104 | 8B Boiler | 391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)<br>391-3-1-.02(2)(b) | None | N/A |
| 105 | Toddville Boiler | 391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g) | None | N/A |
| **Limestone Processing Mills and Pulverizers** | | | | |
| 12 | Limestone Mill #1 | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 12C | Baghouse |
| 100 | Limestone Mill #2 | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 100C | Baghouse |
| 35 | 8C Limestone Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 35C | Baghouse |
| 11 | 8A Limestone Silo | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 11C | Baghouse |
| 24 | 8B Limestone Bin | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 24C | Baghouse |
| 6 | 6A Pulverizer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 6C | Baghouse |
| 7 | 6B Pulverizer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 7C | Baghouse |
| 8 | 6C Pulverizer | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 8C | Baghouse |
| 23 | #0 Silo | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 23C | Baghouse |
| 20 | P2 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 20C | Baghouse |
| 21 | P3 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 21C | Baghouse |
| 101 | Soda Ash Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 101C | Baghouse |
| 103 | 8C Tetra Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 103C | Baghouse |
| **Dryers** | | | | |
| 1 | 2A Spray Dryer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 1C | Baghouse |
| 2 | 2B Spray Dryer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 2C | Baghouse |
| 96 | 2B Spray Dryer Belt Conveyor | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 96C | Baghouse |

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|---|---|---|---|---|
| ID No. | Description | | ID No. | Description |
| 3 | 2C Spray Dryer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 3C | Baghouse |
| 75 | 2C Spray Dryer Conveyor Belt | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 75C | Baghouse |
| 4 | 2D Spray Dryer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 4C | Baghouse |
| 76 | 2D Spray Dryer Conveyor Belt | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 76C | Baghouse |
| 5 | 2F Spray Dryer | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 5C | Baghouse |
| 77 | 2F Spray Dryer Conveyor Belt | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 77C | Baghouse |
| 9 | Sargent Dryer | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | None | N/A |
| 87 | Sargent Dryer L1 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 87C | Baghouse |
| 88 | Sargent Dryer L2 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 88C | Baghouse |
| 22 | P1 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 22C | Baghouse |
| 81 | #1 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 81C | Baghouse |
| 58 | #18 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 58C | Baghouse |
| 59 | #19 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 59C | Baghouse |
| 60 | #20 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 60C | Baghouse |
| 61 | #21 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 61C | Baghouse |
| 62 | #22 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 62C | Baghouse |
| 63 | #23 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 63C | Baghouse |
| 64 | #24 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 64C | Baghouse |
| **Bagging and Loading** | | | | |
| 40 | #2A Big Bagger Product Receiver | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 40C | Baghouse |
| 41 | #2A Big Bagger | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 41C | Baghouse |
| 42 | #2A Big Bagger Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 42C | Baghouse |
| 33 | #2C Big Bagger Product Receiver | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 33C | Baghouse |
| 45 | #2C Big Bagger Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 45C | Baghouse |
| 19 | #2D Bagging Product Receiver | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 19C | Baghouse |

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|---|---|---|---|---|
| ID No. | Description | | ID No. | Description |
| 48 | #2D Bagger Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 48C | Baghouse |
| 92 | 2D Bagger | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 92C | Baghouse |
| 93 | 2D Big Bagger | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 93C | Baghouse |
| 31 | 2D Screen-Elevator Scavenger | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 31C | Baghouse |
| 108 | #6 Big Bagger -B Vacuum Receiver | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 108C | Baghouse |
| 90 | #6 Big Bagger Bin #1 | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 90C | Baghouse |
| 91 | #6 Big Bagger #1 | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 91C | Baghouse |
| 109 | #6 Big Bagger -A Vacuum Receiver | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 109C | Baghouse |
| 110 | Vacuum Clean-up | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 110C | Baghouse |
| 106 | #6 Big Bagger Bin #2 | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 106C | Baghouse |
| 107 | #6 Big Bagger -B | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 107C | Baghouse |
| 13 | 6A Bagger Product Receiver #1 | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 13C | Baghouse |
| 14 | 6A Bagger Product Receiver #2 | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 14C | Baghouse |
| 53 | 6A Bagger Bin Vent #1 | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 53C | Baghouse |
| 54 | 6A Bagger Bin Vent #2 | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 54C | Baghouse |
| 52 | #6 Bagger | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 52C | Baghouse |
| 71 | 6A Bagging conveying Scavenger | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 71C | Baghouse |
| 72 | Plant 6 Housekeeping Scavenger | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 72C | Baghouse |
| 82 | #2 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 82C | Baghouse |
| 83 | #3 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 83C | Baghouse |
| 84 | #4 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 84C | Baghouse |
| 85 | #5 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 85C | Baghouse |
| 86 | #6 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 86C | Baghouse |
| 97 | 2A Bulk Loading Conveyor Belt | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 97C | Baghouse |
| 49 | 2A Bulk Loading | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 49C | Baghouse |
| 65 | #25 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 65C | Baghouse |

| Emission Units | | Applicable Requirements/Standards | Air Pollution Control Devices | |
|---|---|---|---|---|
| ID No. | Description | | ID No. | Description |
| 66 | #26 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 66C | Baghouse |
| 67 | #27 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 67C | Baghouse |
| 68 | #28 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 68C | Baghouse |
| 69 | #29 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 69C | Baghouse |
| 70 | #30 Silo | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 70C | Baghouse |
| 46 | 2D Bulk Loading | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 46C | Baghouse |
| 78 | 100 Ton Bin | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 78C | Baghouse |
| 26 | 2A Cowles Big Bag Receiver | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 26C | Baghouse |
| 25 | 2A Cowles Product Receiver | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 25C | Baghouse |
| 16 | 2A Cowles Bin | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 16C | Baghouse |
| 17 | 2B Cowles Bin | 391-3-1-.02(2)(p)2<br>391-3-1-.02(2)(b) | 17C | Baghouse |
| 18 | 2C Cowles Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 18C | Baghouse |
| 55 | A93 Bin | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 55C | Baghouse |
| 56 | A93 Bulk Loading Bin | 40 CFR 60 Subpart OOO<br>391-3-1-.02(2)(p)1 | 56C | Baghouse |
| 73 | Fluid Catalyst Bin | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 73C | Baghouse |
| 74 | Fluid Catalyst Bulk Loading | 391-3-1-.02(2)(p)1<br>391-3-1-.02(2)(b) | 74C | Baghouse |

Emission and Operating Caps:

Some of the conditions in Section 3.2 of the enclosed permit establish limits meant to avoid, 40 CFR 52.21, *Prevention of Significant Deterioration* (PSD) of Air Quality.

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*. 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*. Furthermore, the facility has Calciners/Dryers, which preexist and, thus, are not subject to 40 CFR 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries* (Subpart UUU applicability date is April 23, 1986).

NSPS Subpart Dc applies to steam generating units that were constructed, modified, or reconstructed after June 9, 1989 and that have a maximum design heat input capacity of greater than or equal to 10 MMBtu/hr, but less than 100 MMBtu/hr. The facility operates 8D Boiler (ID No. 98), 8B Boiler (ID No. 104), and

Toddville Boiler (ID No. 105) that meet the definition of steam generating unit. 8D Boiler, and 8B Boiler are not subject to NSPS Subpart Dc as they were installed prior to June 9, 1989. The Toddville Boiler is not subject to NSPS Subpart Dc as it has a heat input capacity less than 10 MMBtu/hr. Process dryers and air handling units do not meet the definition of steam generating unit as they are directly fired and do not heat any heat transfer medium. No units at the Toddville facility are subject to NSPS Subpart Dc.

Although the boilers on site are exempt from 40 CFR 63 Subpart JJJJJJ," National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" they must comply with its provisions in order to maintain an exemption status. As an area source facility with boilers that primarily burn natural gas with fuel oil as a backup, the boilers must comply with the restrictions set in Condition 3.2.9.

Rule 391-3-1-.02(2)(d), *Fuel-burning Equipment*, as being applicable its dryers and hammer mills do not fall under the definition of "Fuel-burning equipment" under Georgia Air Quality Rules. Also, fuel combusting equipment are subject to Georgia Rules 391-3-1-.02(2)(g), *Sulfur Dioxide*, and 391-3-1-.02(2)(b), *Visible Emissions*. The company burns natural gas, propane, and/or fuel oil (Georgia Rule (g) limits fuel burning sources, below 100 million BTU/hr, to burning fuel containing no more than 2.5% sulfur).

C. Permit Conditions

KaMin LLC – Toddville Plant stated in Title V permit renewal Application No. 807444 that: *"Boiler 8C (Unit ID 99) has been fully decommissioned and removed from the facility. KaMin requests this source and its applicable conditions be removed from the permit*." This request has been granted (Reference to Boler 8C has been removed from Conditions 3.2.3, 3.2.4, 3.2.9, 3.4.2, 3.4.7, 6.1.7, 6.2.6, 6.2.7, 6.2.9, 6.2.10, and 6.2.11).

Table 5.1 of Application No. 807444 contained a request, by KaMin LLC – Toddville Plant, to add 40 CFR 60 Subpart OOO applicability to its scavengers and receivers. However, in a letter dated July 15, 2024, the company withdraw its request and stated: "*The evaluation of the applicability was reviewed and determined based on the scavengers' and receivers' functionality in relevance to the applicable types of equipment outlined in NSPS 000 60.670. The applicability was thoroughly discussed with Mr. Hamid Yavari (Minerals Permitting Manager) through various email exchanges and phone calls. Ultimately, EPD decided that both scavengers and receivers do not fall into the applicable categories in NSPS 000 60.670 and are therefore, not subject to the requirements of this rule*."

KaMin LLC – Toddville Plant July 15, 2024 letter, also contained a request to remove 8C boiler (Source code: 99) and associated conditions because this unit has been decommissioned and removed from the facility. Addiontally, the referenced letter stated: "*During the acquisition of the Toddville plant from BASF Corporation, KaMin may or may not have purchased all the neighboring mine pits that supply clay to the facility. The Toddville facility may use the aforementioned mines as well as other mines owned by KaMin in Georgia. To avoid limiting clay access to just the Middle Georgia mines, KaMin requests that the language specified below be removed from the perm it and narrative to allow for operational flexibility. "KaMin LLC Toddville Plant operates three general 111ini11g operations in the Middle Georgia area. One is localed in Washing/on County and two are located in Wilkinson County."*"

## 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

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. Condition 4.2.2 address 40 CFR 60 Subpart OOO requirements mandating repeating performance tests, within 5 years, for fugitive emissions from affected facilities without water sprays (This applies only to equipment that commence construction, modification, or reconstruction on or 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

No new monitoring conditions are being added to the enclosed Title V Renewal Permit.

C. Compliance Assurance Monitoring (CAM)

Each emission unit controlled by a "*control device*," as defined by 40 CFR 64.1, 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.

KaMin LLC – Toddville Plant has not requested any changes to the existing CAM Plan. Therefore, no new CAM requirements are applicable to this Title V renewal permit.

## 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

Other than the removal of Boiler 8C (Unit ID 99), no changes or new permit Condition are being added to Sections 6.1 and 6.2.

## VII. Specific Requirements

A. Operational Flexibility

Conditions 7.1.1 and 7.2.1 contain general operational flexibility provisions.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

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

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None 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 9, 2024, and ended on December 9, 2024. Comments were not received by the Division. Accordingly, the permit is being issued without changes to its draft format.