

**SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW**

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Facility Name: **Thiele Kaolin Company - Sandersville Plant**

City: Sandersville

County: Washington

AIRS #: 04-13-303-00006

Application #: TV-886400

Date SIP Application Received: January 9, 2025

Date Title V Application Received: January 9, 2025

Permit No: 3295-303-0006-V-05-1

<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 the referenced SIP permit to construct and proposed operating permit amendment. 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) 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 draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

**I. Facility Description**

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3295-303-0006-V-05-0	November 13, 2023	Title V Permit Renewal

B. Regulatory Status

1. PSD/NSR/RACT

Thiele Kaolin Company, Sandersville Plant is a major source under PSD/NSR regulations for Particulate Matter (PM) and Sulfur Dioxide (SO<sub>2</sub>). Thiele Sandersville is subject to PM, PM<sub>10</sub> and SO<sub>2</sub> emission limits set in order to assure significant deterioration does not occur in accordance with 40 CFR Part 52.21 *“Prevention of Significant Deterioration of Air Quality”*.

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 <sub>10</sub>	✓	✓		
PM <sub>2.5</sub>	✓	✓		
SO <sub>2</sub>	✓	✓		
VOC	✓			✓
NO <sub>x</sub>	✓	✓		
CO	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

**II. Proposed Modification**

A. Description of Modification

The Permittee has proposed multiple changes to the Atrex mixing system including the addition of an 2nd Atrex Mixer that will vent indoors after a scrubber. The new “Atrex Mixer #2 400A Weigh Belt” (Source ID: SC33) will be controlled by the new attached SB54 Dust Collector and will vent inside.

A new – “Atrex Mixer #2 Screw Conveyor” (Source ID: SC34) will also be installed and will emit indoors. The existing Atrex Grinder/Mixer (Source ID: SM05) will vent indoors after the scrubbing system instead of venting to the atmosphere through baghouses SB20 and SB21. All new sources will vent inside building and will not increase emissions to atmosphere.

The “Slurry system silo 400A weigh belt will exhaust to a new attached SB55 Dust Collector instead of baghouse SB23.

In the most recent Title V renewal (Permit No. 3295-303-0006-V-05-0), the Railcar Loading at Spray Dryer No. 3 (Source ID: SC31) was inadvertently omitted from the equipment list in Condition 3.1. It has been returned to the equipment list in Condition 3.1.1 with this modification.

**B. Emissions Change**

All new/affected emission units will operate and exhaust indoors, and as such, there will be no increase in emissions from the proposed modifications.

**C. PSD/NSR Applicability**

Not applicable since there is no increase in emissions from the proposed changes

**Addendum to Narrative**

The 45-day EPA review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//