Facility Name: **Golden Peanut Company, LLC**
City: Dawson
County: Terrell
AIRS #: 04-13-273-00022

Application #: TV-766112
Date Application Received: September 15, 2023
Permit No: 2076-273-0022-V-06-0

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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:Golden Peanut Company, LLC

2. Parent/Holding Company Name

Archer Daniels Midland Company (ADM) owns and operates the Peanut Shelling Plant, and the Golden Peanut Company operates the Vegetable Oil extraction plant and refinery in Dawson, Georgia.

3. Previous and/or Other Name(s)

Shelling Plant:
The shelling plant was first owned and operated by Stevens Industries from 1989 to December 1991, when ownership of the facility changed to Tristate America, L.P. In October 1994, the ownership of the shelling plant changed to Cargill/Stevens Industries. Ownership of the shelling plant changed to Golden Peanut Company in early 2000. Ownership of the shelling plant is under ADM as of 2003.

Oil Mill:
Previously the Vegetable Oil Mill was known as Cargill Inc., Stevens Industries, Inc. and was a part of Cargill until late 2000 when the facility changed ownership to the Golden Peanut Company (Golden Peanut). Golden Peanut Company continues to own and operate the vegetable oil extraction plant and refinery.

4. Facility Location

715 Martin Luther King Jr. Drive
Dawson, Georgia 39842

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

The facility is located within the limits of Terrell County which is an attainment area for all criteria air pollutants.

B. Site Determination

Archer Daniels Midland Company (ADM) owns and operates the Peanut Shelling Plant (The Golden Peanut Company – Peanut Shelling Plant [AIRS No.: 273-00009]), and the Golden Peanut Company (Golden Peanut) owns and operates a vegetable oil extraction plant and a vegetable oil refinery (The Golden Peanut Company, LLC – Vegetable Oil Mill [AIRS No.: 273-00022]) in Dawson, Georgia (Facility). The Peanut Shelling Plant and the Vegetable Oil Mill operate under common control of ADM and are located on contiguous property; however, they do not belong to the same industrial grouping (i.e. they do not belong to same two digit SIC grouping). The Golden Peanut Company, LLC – Vegetable Oil Mill (AIRS No.: 273-00022) is a major source of Hazardous Air Pollutants, which

means that the Title V site must include operations, which fall under common control and are located on contiguous property.

The Golden Peanut Company – Peanut Shelling Plant (AIRS No.: 273-00009) and The Golden Peanut Company, LLC – Vegetable Oil Mill (AIRS No.: 273-00022) became one site for Title I and Title V on March 24, 2003 when both facilities came under common control. Permit No.: 0723-273-0009-V-03-0 for The Golden Peanut Company, LLC – Vegetable Oil Mill (AIRS No.: 273-00009) was officially revoked on August 30, 2007. The permit continues to be renewed under AIRS No. 273-00022 for both the Shelling Plant and the Vegetable Oil Mill, hereinafter referred to as the 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
2076-273-0022-V-05-0	March 15, 2019	Title V Renewal
2076-273-0022-V-05-1	November 5, 2020	Minor Modification with Construction to remove Cyclones (CY22-CY26) and replace them with new baghouse (BH22)
2076-273-0022-V-05-2	April 11, 2024	502(b)10 Change to replace two boilers (OM33 and RP13) with two similar NG fired boilers (VB1 and VB2)

D. Process Description

1. SIC Codes(s)

0723 – Crop Preparation Services for Market, Except Cotton Ginning. This code is used for nut shelling and hulling including peanut shelling.

2076 – Vegetable Oil Mills except Corn, Cottonseed and Soybean. This code is for peanut oil, cake and meal production. While both “0723” and “2076” are applicable, the facility has agreed to use only SIC code, 2076, for the Title V site.

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 cleans and processes whole peanuts, shells the peanuts and sorts them according to size. The facility produces shelled peanuts, oil stock peanuts, and peanut hulls. The oil mill produces crude peanut oil meal from peanut cake and hull from the peanut shells.

3. Overall Facility Process Description

Shelling Plant:
The Peanut Shelling Plant processes farmer stock peanuts and produces shelled peanuts, peanut hulls and oil stock peanuts. Operations at this facility consist of peanut receiving and storage, cleaning of debris and mud from whole peanuts, shelling of peanuts (i.e., separation of shells from kernels/meat), sorting of peanuts by color and size, hull processing, and generation of feedstock for the on-site peanut oil extraction plant. The shelling plant receives whole peanuts by truck and stores the peanuts in one of three covered warehouses. Particulate matter (PM) emissions are generated from the cleaning and shelling operations at the Peanut Shelling Plant. These emissions are controlled using cyclones and baghouses.

Oil Mill:
Oil Extraction:
The peanuts are sent through a sand screen and then to an air cleaning system to remove debris. The peanuts are sent to cracking rolls and then to the cooker where the peanuts are heated up to 230° F for approximately 1.5 hours. The conditioned peanuts are conveyed to the oil presses. The oil presses remove about 66% of the oil in the cooked peanuts and produce a cake (peanut cake), which is sent to the extractor. The pressed crude peanut oil is pumped to a settling tank to remove the solids. The oil is then decanted to remove water, sent through an oil dryer to remove additional water, stored, and then transferred to the adjacent oil refinery.

The peanut cake is heated to remove and recover the remaining oil left in it using hexane in a solvent oil extraction process. The peanut cake is conveyed to the extraction process where it is introduced into a shallow bed, percolation type, continuous, counter-current extractor, which is a closed system of hexane and miscella (a mixture of hexane and vegetable oil). The hexane is used to remove the remaining oil from the peanut cake. After the extractor, the material consists of wet cake and miscella. The wet cake then goes through a desolventizer/toaster/dryer/cooler (DTDC) unit where the remaining hexane in the peanut cake is removed using steam in the DT portion. The peanut cake then goes through the dryer/cooler unit where it is dried and cooled before going to a sifter/grinder unit to be sized into a finished meal product. The meal is then stored and shipped out as animal feed. The miscella from the extractor passes through hydroclones to remove suspended solids and is then separated into oil and solvent using a series of evaporators and condensers. After evaporation, oil flows to a stripper, which removes the remaining traces of solvent by heating with low-pressure steam. The solvent/water vapors from the evaporators are condensed and fed to the solvent/water separator, which is a continuous decanting system. The non-condensable vent gases are sent to a mineral oil absorption system.

Oil Refining:
Oil from the extraction plant is processed to food grade condition through a 3-step process at the adjacent refining plant. The oil is first reacted with an alkali solution to neutralize fatty acids contained in the oil, next the fatty acids are then removed from the oil via a centrifuge, then the oil separated from the centrifuge is washed and processed through a second centrifuge to remove residual soap. Color producing substances within the oil are removed by bleaching the oil with activated clay. After the clay is filtered from the oil, any remaining volatile compounds are removed by deodorizing the oil in a stripper which operates at a high vacuum and temperature. The refined oil is then filtered, stored, and shipped via railcars and trucks to packaging facilities. Equipment associated with operations includes mixing and retention vessels, heat exchangers, centrifuges, filters, steam boilers, and a vacuum stripper.

The Facility operates three boilers (VB1, VB2 and RP17), fired with natural gas, to produce the required heat and process steam. Two boilers (VB1 and VB2) are rated at 19.64 and 27.48 MMBtu/hour, respectively. RP17 is a fuel burning unit of less than 2 MMBtu/hr heat capacity and is listed in the insignificant activities section.

Hulls:
The hull bran is shipped out and is used by the pesticide industry for carrying pesticides on pellets made from the hull bran.

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 facility is comprised of an oil refining process and a shelling process located within Terrell County which is designated as attainment area for all criteria air pollutants. The oil refining process is a major source under PSD regulations because it is not included in the 28 named source categories in 40 CFR Part 52.21 and this process has the potential to emit 250 tons per year (tpy) of particulate matter (PM/PM_{10}/$PM_{2.5}$). The shelling plant is a minor source for particulate matter and all other PSD regulated pollutants because potential emissions are less than 250 tpy for any NSR regulated pollutant.

PSD determination of applicability was made based on the total project-related emissions increases which are below the PSD significant levels for each respectively emitted NSR pollutant. The facility was constructed/installed before the PSD/NSR applicability date and has not undergone any major modification since 1977 to trigger a new source review under the PSD regulations.

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	y	✓		
PM_{10}	y	✓		
$PM_{2.5}$	y	✓		
SO_2	y			✓
VOC	y	✓		
NO_x	y			✓
CO	y			✓
TRS	y			✓
H_2S	y			✓
Individual HAP	y	✓		
Total HAPs	y	✓		

3. MACT Standards

The Peanut Shelling Plant by itself is a minor source of individual and combined HAPs since HAP emissions from the shelling plant are negligible. The contiguous Vegetable Oil Mill is a major source of HAPs and is subject to 40 CFR 63 Subpart GGGG – "National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production" as of April 12, 2001. The Peanut Shelling Plant and the Vegetable Oil Mill constitute one Title I site which is subject to the Vegetable Oil MACT. The shelling plant does not perform solvent extraction of the peanuts, so the shelling plant itself is not subject to any MACT requirements.

Since the Vegetable Oil Mill is major for HAPs, the boilers VB1 and VB2 must meet the requirements of 40 CFR 63 Subpart DDDDD "National Emission Standards for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters".

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	yes
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility did not indicate any non-compliance issues in the Title V Permit Application.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Shell Plant Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
PC02-PC04	Pre-Cleaners	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH03 & BH05	Baghouse
SH01	Shellers (20)	391-3-1-.02(2)(b)1, 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH04	Baghouse
SH02	Gravity Tables (12)	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH07 & BH08	Baghouse
SH02A	Air Screen	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH07 & BH08	Baghouse
SH03	Destoners (3)	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH03, BH04, BH07, BH08	Baghouses
SH12	Meats Recovery from Hulls (3 Gravity Tables)	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH02	Baghouse
SH14	Hammermills	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	BH09	Baghouse
TR01	Transfer from Warehouse No. 13	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(n)	N/A	N/A
Oil Mill Emission Units		**Applicable Requirements/Standards**	**Air Pollution Control Devices**	
ID No.	**Description**		**ID No.**	**Description**
OM01	Truck Receiving Pit	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A
OM06	Farmer Stock (FS) Cleaner	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH19	Baghouse
OM08	Sheller	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH19	Baghouse
OM23	Extraction Unit	40 CFR 63 Subpart A 40 CFR 63 Subpart GGGG 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	MOS01	Mineral Oil System
OM25	Desolventizer/Toaster/Dryer/Cooler (DTDC)	40 CFR 63 Subpart A 40 CFR 63 Subpart GGGG 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CYC3 MOS01	Cyclone Mineral Oil System
OM28	Meal Grinder/Sifter	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH06	Baghouse
OM30	Meal Loadout to Rail	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH06	Baghouse
OM31	Meal Transfer to Truck Loadout	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH06	Baghouse
OM32	Meal Truck Loadout	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH06	Baghouse
OM38	400 Ton capacity Day Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A

RP03	Acid Reactor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A
RP04	Retention Mixer and Neutralization	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A
RP08	Bleacher/Filters/Surge tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A
RP10	Deodorizer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	N/A
VB1	Victory Energy F2-WB-E97L-500X-S200 Natural Gas fired Boiler (19.64 MMBtu/hr)	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subparts A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	N/A	VB1
VB2	Victory Energy F2-WB-E104L-700X-S200-R Natural Gas fired Boiler (27.48 MMBtu/hr)	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subparts A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	N/A	VB2

* 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.

B. Equipment & Rule Applicability

Emission and Operating Caps:

None Applicable

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.03(2)(b) – "Visible Emissions"

Shelling Plant:

The visible emissions from the following process equipment/groups are potentially affected by Rule (b).

- The Pre-cleaners (PC02-PC04)
- The Shellers (20) (SH01)
- The Gravity Tables (12) (SH02)
- The Air Screen (SH02A)
- The Destoners (3) (SH03)
- Meats Recovery from Hulls (SH12)
- The Hammermills (SH14)
- Transfer from Warehouse No. 13 (TR01)

Oil Mill:

The visible emissions from the following process equipment/groups are potentially affected by Rule (b).

- Truck Receiving Pit (OM01)
- Farmer Stock Cleaner (FS) (OM06)
- Sheller (OM08)

- Mineral Oil System (Extraction) (OM23)
- Meal Rotary Dryer/Meal Cooler Unit including the Desolventizer Toaster (OM25)
- Meal Grinder/Sifter (OM28)
- Meal Loadout to Rail (OM30)
- Meal & Hull Transfer to Truck Loadout (OM31)
- Meal or Hull Truck Loadout (OM32)
- 400 ton capacity Day Bin (OM38)
- Acid Reactor (RP03)
- Retention Mixer and Neutralization (RP04)
- Bleacher/Filters/Surge Tank (RP08)
- Deodorizer (RP10)
- Natural Gas-fired Boilers (2) (VB1 and VB2)

All emission units at the shelling plant and oil mill are subject to Rule (b) for opacity. Rule (b) limits visible emissions from sources to less than 40% opacity. However, Rule (b) also states that other more stringent regulations or permit conditions may be specified as establishing an allowable emission rate.

Georgia Rule 391-3-1-.02(2)(d) – "Fuel Burning Equipment"
Oil Mill:
The visible emissions from the following process equipment/groups are potentially affected by Rule (d).

- Boiler (19.64 MMBtu/hr) (VB1)
- Boiler (27.48 MMBtu/hr) (VB2)

Golden Peanut Company, LLC operates these two Hurst boilers, which generate steam for various parts of the process. The primary fuel is natural gas only for both VB1 and VB2.

Boilers VB1 and VB2 are subject to the particulate matter limit for fuel burning equipment installed after January 1, 1972 with a heat input capacity between 10 MMBtu/hr and 250 MMBtu/hr. [Georgia Rule 391-3-1-.02(2)(d)2(ii)]. Visible emissions from the boiler are limited to 20% except for one six-minute period per hour of not more than 27% opacity (Georgia Rule 391-3-1-.02(2)(d)3).

Georgia Rule (d)2.(ii) limits particulate matter based on the following equation: $E = 0.5*(10/R)^{0.5}$ where E equals the allowable particulate emission rate in pounds per million Btu heat input and R equals the heat input in million Btu per hour.

Georgia Rule 391-3-1-.02(2)(e) – "Particulate Emission from Manufacturing Processes"
Shelling Plant:
PM emissions from various sources and processes in the shelling plant are limited by Georgia Rule (e) allowables. PM emissions from the following process groups are potentially affected by Rule (e).

- The Pre-cleaners (PC02-PC04)
- The Shellers (20) (SH01)
- The Gravity Tables (12) (SH02)
- The Air Screen (SH02A)
- The Destoners (3) (SH03)
- Meats Recovery from Hulls (SH12)

- The Hammermills (SH14)
- Transfer of peanuts from the warehouse (TR01)

Each operation constitutes a separate Georgia Rule (e) process since the amount of materials processed in each operation is different. All emission units IDs listed in the table in Section III are non-fugitive sources. Emissions from these units are aspirated to product collectors such as cyclones or baghouses before venting to the atmosphere. Various operations in the shelling plant are conducted under slightly negative pressure to minimize or prevent generation of fugitive emissions.

Oil Mill:
PM emissions from various sources and processes in the oil mill are limited by Georgia Rule (e) allowables. PM emissions from the following process groups are potentially affected by Rule (e).

- Truck Receiving Pit (OM01)
- Farmer Stock (FS) Cleaner (OM06)
- Sheller (OM08)
- Mineral Oil System (Extraction) (OM23)
- Meal Rotary Dryer/Meal Cooler Unit including the Desolventizer Toaster (OM25)
- Meal Grinder/Sifter (OM28)
- Meal Loadout to Rail (OM30)
- Meal & Hull Transfer to Truck Loadout (OM31)
- Meal or Hull Truck Loadout (OM32)
- 400 ton capacity Day Bin (OM38)
- Acid Reactor (RP03)
- Retention Mixer and Neutralization (RP04)
- Bleacher/Filters/Surge Tank (RP08)
- Deodorizer (RP10)

With the exception of oil mill receiving and storage, the entire Golden Peanut's Oil Mill is one process under Georgia Rule (e). EPD defines a "process" as a unit operation or combination of unit operations which cannot be operated independently of each other. Although Golden Peanut's facility encompasses a combination of unit operations, its peanut processing and extraction plant will be considered as one process operation since their unit operations are not independent of each other.

Georgia Rule (e) specifies equations that are used to determine the allowable emission rate from manufacturing processes. However, please note that other regulations or permit conditions may take precedence over Rule (e) in establishing allowable emission rates.
The following equations are used to compute the allowable PM emission rate:

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour

$E = 55P^{0.11} - 40$; for process input weight rate above 30 tons per hour

where: E = emission rate in pounds per hour

P = process input weight in tons per hour.

Georgia Rule 391-3-1-.02(2)(g) – "Sulfur Dioxide"

Oil Mill:

The sulfur emissions from the following process equipment/groups are limited by Rule (g).

- Boiler (19.64 MMBtu/hr) (VB1)
- Boiler (27.48 MMBtu/hr) (VB2)

Golden Peanut Company, LLC operates these two Hurst boilers, which generate steam for various parts of the process. The primary fuel is natural gas only for both VB1 and VB2.

SO_2 emissions are limited by limiting the fuel sulfur content to no more than 2.5 percent, by weight, as required by Georgia Rule 391-3-1-.02(2)(g)2.

Georgi Rule 391-3-1-.02 (2)(n) – "Fugitive Dust"

Rule (n) requires all persons responsible for any operation, process, handling, transportation, or storage facility which may result in fugitive dust shall take all reasonable precautions to prevent such dust from becoming airborne. The opacity from any fugitive dust source shall not equal or exceed 20 percent. All fugitive dust sources at the facility will be controlled appropriately.

40 CFR 60 Subpart Dc – "New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units"

Subpart Dc establishes SO_2 and PM emissions standards, testing, monitoring, recordkeeping, and reporting requirements for each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and has a maximum design heat input capacity greater than or equal to 10 MMBtu/hr and less than or equal to 100 MMBtu/hr. Boilers VB1 and VB2 have a rated heat input capacity of less than 100 MMBtu/hr. Therefore, Subpart Dc is applicable, and the facility will comply with the associated applicable notification, reporting, and recordkeeping requirements as applicable.

40 CFR 63 Subpart GGGG – "National Emission Standards for Hazardous Air Pollutants (NESHAP) for Solvent Extraction for Vegetable Oil Refining"

Oil Extraction Process:

Subpart GGGG establishes national emission standards for hazardous air pollutants (NESHAP) for emissions during vegetable oil production. The affected source under this rule is the "vegetable oil production process" which is a major source of HAPs or is collocated at a major source of HAP emissions. "Vegetable Oil Production Processes" is defined in 40 CFR 63.2872 and does not include the oil refining process. The oil extraction plant is classified as an existing source under Table 1 of 40 CFR 63.2833.

40 CFR 63 Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters"

Subpart DDDDD (referred to as "Boiler MACT") applies to boilers and process heaters located at major sources of HAPs and sets forth emission limitations and work practice standards; testing and fuel analyses requirements; and monitoring, recordkeeping, notification, and reporting requirements. Boilers VB1 and VB2 will be subject to the Boiler MACT since the facility is a major source of HAPs. Subpart DDDDD defines affected sources as new, reconstructed, or existing emissions units based on the date of June 4, 2010. A boiler is a new unit if construction commenced after June 4, 2010. Both boilers will be constructed after June 4, 2010, and will be considered new emission units with respect

to Subpart DDDDD. As new affected sources, compliance will be required upon startup of boilers VB1 and VB2 per 40 CFR 63.7495(a). The facility must conduct subsequent (i.e., annual) tune-ups in accordance with the schedules prescribed in 40 CFR 63.7510(g), 40 CFR 63.7515(d), and 40 CFR 63.7540(a)(12). The facility must comply with the associated applicable notification, reporting, and recordkeeping requirements of Subpart DDDDD for Boilers VB1 and VB2.

C. Permit Conditions

Condition No. 3.3.1 requires the Permittee to demonstrate compliance with all applicable portions of 40 CFR Part 63 Subpart A and Subpart GGGG.

Condition No. 3.3.2 requires the Facility be limited to 1.2 gallons of HAP (hexane) per ton of peanuts processed during any twelve consecutive months and requires that the actual solvent loss to allowable solvent loss ratio be less than or equal to 1. This condition does not apply during startup, shutdown, and malfunction.

Condition No. 3.3.3 requires that the facility comply with all applicable portions of 40 CFR 63.2850(a) and Table 1 and 2 of 40 CFR 63.2850.

Condition No. 3.3.4 has been modified to remove reference to boilers OM33 and RP13 and establish subjection of 40 CFR 60 Subpart Dc for replacement boilers VB1 and VB2.

Condition No. 3.3.5 has been modified to remove reference to boilers OM33 and RP13 and establish subjection of 40 CFR 63, Subparts A and DDDDD for replacement boilers VB1 and VB2.

Condition No. 3.4.1 limits the opacity of visible emissions from emission sources in the shelling plant to 40% or less per Georgia Rule (b).

Condition No. 3.4.2 contains Rule (e) allowable PM emission limit equations for emission sources in the shelling plant.

Condition No. 3.4.3 contains Rule (n) allowable fugitive emission limit of not more than 20% opacity and reasonable precautions that can reduce the risk of dust becoming airborne for the shelling plant.

Condition No. 3.4.4 has been modified to remove reference to boilers OM33 and RP13 and establish subjection of the PM limit in Georgia Rule(d) for replacement boilers VB1 and VB2.

Condition No. 3.4.5 limits the opacity of visible emissions from the oil mill process equipment to 40% or less.

Condition No. 3.4.6 limits particulate matter emissions from process equipment in the oil mill per Georgia Rule (e).

Condition No. 3.4.7 has been modified to remove reference to boilers OM33 and RP13 and establish subjection of the fuel sulfur limit in Georgia Rule (g) for replacement boilers VB1 and VB2.

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.

Condition No. 4.1.3 has been modified to include Method 10 performance testing for determining the CO emission concentration in accordance with Condition No. 5.2.6.

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

Condition No. 5.2.1 has been modified to remove reference to Cyclones, CY22-CY26, following their replacement with baghouse, BH09. The facility has requested to change the Emissions Unit ID No. BH22 to BH09. This condition has been reformatted following the deletion of 5.2.1.a in Permit No. 2076-273-0022-V-05-1.

Condition No. 5.2.2 requires the Permittee conduct monitoring for the pressure drop across baghouses which control PM emissions from meal transfer operations to sifter/grinder, sifter/grinder, meal loadout to rail, meal & hull transfer to truck loadout and meal & hull loadout to truck.

Condition No. 5.2.3 requires the Permittee to perform daily pressure drop checks and daily visible emission checks for all baghouses in the shelling plant and vegetable oil mill.

Condition No. 5.2.4 requires that the Permittee develop and implement a preventive maintenance program for the baghouses at the vegetable oil mill.

Condition No. 5.2.5 has been modified to remove reference to boilers OM33 and RP13 and establish monitoring requirements from Subpart Dc for replacement boilers VB1 and VB2.

Condition No. 5.2.6 has been modified to remove reference to boilers OM33 and RP13 and establish subjection annual tune-ups per Subpart DDDDD for replacement boilers VB1 and VB2.

C. Compliance Assurance Monitoring (CAM)

Not Applicable.

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.

Condition No. 6.1.7.c.i has been modified to remove reference to cyclones, CY22-CY26, and include reference to baghouse, BH09. The facility has requested to change the Emissions Unit ID No. BH22 to BH09.

B. Specific Record Keeping and Reporting Requirements

Condition No. 6.2.1 requires the Permittee to maintain an inventory of filter bags for the baghouses in the shelling plant and vegetable oil mill.

Condition No. 6.2.2 requires the Permittee to develop and implement a written site-specific plan as required to comply with monitoring and recording data requirements of the Vegetable Oil MACT 40 CFR 63, Subparts A and GGGG. This condition has been modified to include 40 CFR 63.2851(a)(1) through (8) following revisions made to 40 CFR 63 Subpart GGGG on March 18, 2020.

Old Condition No. 6.2.3 has been removed from the Permit following revisions made to 40 CFR 63 Subpart GGGG on March 18, 2020. The Permittee is no longer required to develop and implement a plan for a Startup, Shutdown, and Malfunction Plan (SSM Plan). The remaining conditions have been renumbered.

Condition No. 6.2.3 requires that the facility determine and record solvent loss during each operating month and follow the requirements in accordance with 40 CFR 63.2853.

Condition No. 6.2.4 requires the Permittee to determine and record the weighted average volume fraction of HAP in the actual solvent loss, and, if the monthly weighted average volume fraction of HAP are determined for 12 or more months, to require that the 12-operating month overall weighted average volume fraction be calculated in accordance with 40 CFR 63.2854 so that the Compliance Ratio can be calculated in accordance with 40 CFR 63.2840.

Condition No. 6.2.5 requires the Permittee to determine and record the amount of oilseed (peanuts) processed on an “as-received” basis as defined in 40 CFR 63.2872, and, if the oilseed processed has been determined for 12 or more months, to require that the 12-operating month rolling sum of oilseed processed be calculated in accordance with 40 CFR 63.2855.

Condition No. 6.2.6 requires the Permittee to calculate and record the Compliance Ratio in accordance with 40 CFR 63.2840.

Condition No. 6.2.7 has been modified to remove reference to boilers OM33 and RP13 and establish recordkeeping requirements per Subpart Dc for replacement boilers VB1 and VB2.

Condition No. 6.2.8 requires the Permittee to submit reports required by 40 CFR 63.2861 related to annual compliance certification and deviation reports. This condition has been modified to remove old 6.2.8.c and 6.2.8.d which referenced the SSM plan that is no longer required after September 15, 2020. Condition 6.2.8.b has been modified to reference 40 CFR 63.2840(c) instead of 40 CFR 63.2861(c). Condition 6.2.8.c has been added to the Permit following revisions made to 40 CFR 63 Subpart GGGG on March 18, 2020.

Condition No. 6.2.9 requires the Permittee to maintain records required by 40 CFR 63.2862(c) through (h), except as specified in Condition No. 3.3.3. This condition has been modified to include 40 CFR 63.2862(f) through (h) following revisions made to 40 CFR 63 Subpart GGGG on March 18, 2020.

Condition No. 6.2.10 has been modified to remove reference to boilers OM33 and RP13 and establish annual compliance report requirements per Subpart DDDDD for replacement boilers VB1 and VB2.

Condition No. 6.2.11 has been modified to remove reference to boilers OM33 and RP13 and establish recordkeeping requirements per Subpart DDDDD for replacement boilers VB1 and VB2.

Condition No. 6.2.12 has been modified to remove reference to boilers OM33 and RP13 and establish notification requirements per Subpart DDDDD for replacement boilers VB1 and VB2.

VII. Specific Requirements

A. Operational Flexibility

- Other than Condition 7.1 in the permit, operational flexibility provisions have not been incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application or request any specific operational flexibility conditions.

B. Alternative Requirements

- Not 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

- The facility did not indicate any noncompliance issues in their application.

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

- 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 September 25, 2024 and ended on October 28, 2024. Comments were not received by the Division.