# PERMIT AMENDMENT NO. 4741-299-0015-V-04-3 ISSUANCE DATE:



**ENVIRONMENTAL PROTECTION DIVISION** 

# Air Quality - Part 70 Operating Permit Amendment

| Facility Name:          | GATX - Waycross  |
|-------------------------|--|
| Facility Address:       | 2610 Industrial Boulevard<br>Waycross, Georgia 31503 (Ware County) |
| Mailing Address:        | 233 South Wacker Dr.<br>Chicago, IL 60606                          |
| Parent/Holding Company: | General American Transportation Corporation                        |
|                         |  |

Facility AIRS Number: 04-13-299-00015

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The replacement of two current flares [Air Pollution Control Device (APCD) ID Nos. C17 and C28] with two new flares. Additionally, the removal of Boiler B003 and three internal combustion engines (APCD ID Nos. C19, C24, and C25).

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **4741-299-0015-V-04-0**. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **885589** dated **December 17, 2024**; any other applications upon which this Amendment or Permit No. **4741-299-0015-V-04-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **19** pages.



Jeffrey W. Cown, Director Environmental Protection Division

# **Table of Contents**

| PART 1.0        | FACILITY DESCRIPTION   | 1   |
|-----------------|--|-----|
| 1.3             | Process Description of Modification  | 1   |
| <b>PART 3.0</b> | REQUIREMENTS FOR EMISSION UNITS  | 2   |
| 3.1.1           | Modified Emission Units  | 2   |
| 3.2             | Equipment Emission Caps and Operating Limits   | 3   |
| 3.3             | Equipment Federal Rule Standards   |     |
| 3.4             | Equipment SIP Rule Standards   | 6   |
| 3.5             | Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission | Cap |
|                 | or Operating Limit   | 6   |
| PART 4.0        | REQUIREMENTS FOR TESTING   | 8   |
| 4.1             | General Testing Requirements   | 8   |
| PART 5.0        | REQUIREMENTS FOR MONITORING (Related to Data Collection)                                   | 9   |
| 5.2             | Specific Monitoring Requirements   | 9   |
| PART 6.0        | OTHER RECORD KEEPING AND REPORTING REQUIREMENTS  | 11  |
| 6.1             | General Record Keeping and Reporting Requirements  | 11  |
| 6.2             | Specific Record Keeping and Reporting Requirements   |     |
| Attachmen       | ts   | 19  |

#### PART 1.0 FACILITY DESCRIPTION

#### **1.3** Process Description of Modification

GATX – Waycross (GATX) proposes the following modifications to its existing permit:

- To replace its current flares (APCD ID Nos. C17 and C28) with two new flares that will have an overall destruction efficiency of 98% each (and retain the APCD ID Nos. C17 and C28).
- To remove the internal combustion engines (APCD ID Nos. C19, C24, and C25) that control emissions from the Flammable Commodities Purge System (EU ID No. 0019). The emissions from EU ID No. 0019 will be controlled by the new flares (APCD ID Nos. C17 and C28).
- To remove a boiler (ID No. B003) from the permit since the facility has not constructed this emission unit and has no plans in the future.
- To request an enforceable permit condition to preclude the cleaning of railcars containing formaldehyde in Tank Car Cleaning (ID No. 0016).
- To request an enforceable permit condition to limit the operating hours of each boiler (ID Nos. B001 and B002) to 4,300 hours per year per boiler on a 12-month rolling basis.
- To request an enforceable permit condition to preclude the cleaning and purging of railcars containing benzene, butadiene, vinyl chloride, or mixtures thereof in Tank Car Cleaning (ID No. 0016), Pressurized Flammable Gas Purge System (ID No. 0017), and Flammable Commodities Purge System (ID No. 0019). The Interior Painting/Lining Operation (EU ID No. 0013) and Exterior Painting Operation (EU ID No. 0009) will still be sources of benzene emissions as the coatings used in these operations contain trace amounts of it.
- To request a formaldehyde emission limit of 0.01 tons per year on a rolling 12-month basis for the Exterior Painting Operation and 0.27 tons per year on a rolling 12-month basis for the Interior Painting/Lining Operation. As such, the painting operations formaldehyde emissions will be limited to 0.28 tons per year on a rolling 12-month basis.
- To remove permit conditions pertaining to methyl bromide and ammonia as GATX no longer handles any railcars with these commodities.
- Update Attachment B to reflect off permit changes that have occurred since the issuance of the last permit modification.

# PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### **3.1.1 Modified Emission Units**

| Emission Units        |   | Applicable  | Air Pollution Control Devices                              |  |
|-----------------------|---|---|--|--|
| ID No. Description    |   | Requirements/Standards  | ID No.   | Description  |
| 0009                  | Exterior Painting<br>Operation            | 40 CFR Part 63 Subpart A<br>40 CFR Part 63 Subpart<br>MMMM<br>40 CFR Part 64<br>391-3-102(2)(b)<br>391-3-102(2)(e)                          | C9   | Fabric Filters   |
| 0013                  | Interior<br>Painting/Lining<br>Operation  | 40 CFR Part 63 Subpart A<br>40 CFR Part 63 Subpart A<br>40 CFR Part 63 Subpart<br>MMMM<br>391-3-102(2)(b)<br>391-3-102(2)(e)                | C11  | Fabric Filters   |
| <del>0016 Old</del>   | Tank Car Cleaning<br>(Old)                | Toxic Guideline   | C16a old<br>C16b old                                       | Venturi Scrubber<br>Carbon Adsorber  |
| 0016 <del>- New</del> | Tank Car Cleaning<br>(New)                | Toxic Guideline   | C16a <del>new</del><br>C16b <del>new</del><br>C16c<br>C16d | Venturi Scrubber<br>Carbon Adsorber<br>Venturi Scrubber<br>Carbon Adsorber |
| 0017                  | Pressurized Flammable<br>Gas Purge System | Toxic Guideline   | C17<br>C28   | Flare<br>Flare   |
| 0019                  | Flammable<br>Commodities Purge<br>System  | 40 CFR Part 60 Subpart A<br>40 CFR Part 60 Subpart<br>JJJJ<br>40 CFR Part 63 Subpart A<br>40 CFR Part 63 Subpart<br>ZZZZ<br>Toxic Guideline | C19<br>C17<br>C28<br>C24<br>C25                            | I.C. Engine<br>Flare<br>Flare<br>I.C. Engine<br>I.C. Engine                |
| 0020                  | Small Parts Painting<br>and Touchup       | 40 CFR Part 63 Subpart A<br>40 CFR Part 63 Subpart<br>MMMM<br>391-3-102(2)(b)<br>391-3-102(2)(e)  | C20  | Fabric Filter  |
| 0008                  | Exterior Blasting                         | 40 CFR Part 64<br>391-3-102(2)(b)<br>391-3-102(2)(e)  | C8   | Baghouse   |
| 011A and<br>011B      | Interior Blasting                         | 40 CFR Part 64<br>391-3-102(2)(b)<br>391-3-102(2)(e)  | C11  | Baghouse   |
| 0022                  | Interior Blasting                         | 391-3-102(2)(b)<br>391-3-102(2)(e)  | C26  | Baghouse   |
| 0023                  | Solvent Still                             |   | None   | N/A  |
| 0026                  | Interior Blasting                         | 391-3-102(2)(b)<br>391-3-102(2)(e)  | C26  | Baghouse   |
| 0027                  | Interior Blasting                         | 391-3-102(2)(b)<br>391-3-102(2)(e)  | C27  | Baghouse   |

#### **Title V Permit Amendment**

| I               | Emission Units      | Applicable                   | Air            | Pollution Control Devices |
|-----------------|---------------------|------------------------------|----------------|---------------------------|
| ID No.          | Description         | Requirements/Standards       | ID No.         | Description               |
| 0029            | Interior Blasting   | 391-3-102(2)(b)              | C30            | Baghouse                  |
|                 |                     | 391-3-102(2)(e)              |                |                           |
| 0030            | Interior Blasting   | 391-3-102(2)(b)              | C30            | Baghouse                  |
|                 |                     | 391-3-102(2)(e)              |                |                           |
| B001            | 11.5 MMBtu/hr.      | 40 CFR 60 Subpart A          | n/a            | n/a                       |
|                 | natural gas/propane | 40 CFR 60 Subpart Dc         |                |                           |
|                 | fired boiler        | 40 CFR 63 Subpart A          |                |                           |
|                 |                     | 40 CFR 63 Subpart            |                |                           |
|                 |                     | DDDDD                        |                |                           |
|                 |                     | 391-3-102(2)(d)              |                |                           |
|                 |                     | 391-3-102(2)(g)              |                |                           |
|                 |                     | Toxic Guideline              |                |                           |
| B002            | 11.5 MMBtu/hr.      | 40 CFR 60 Subpart A          | n/a            | n/a                       |
|                 | natural gas/propane | 40 CFR 60 Subpart Dc         |                |                           |
|                 | fired boiler        | 40 CFR 63 Subpart A          |                |                           |
|                 |                     | 40 CFR 63 Subpart            |                |                           |
|                 |                     | DDDDD                        |                |                           |
|                 |                     | 391-3-102(2)(d)              |                |                           |
|                 |                     | 391-3-102(2)(g)              |                |                           |
|                 |                     | Toxic Guideline              |                |                           |
| <del>B003</del> | 11.5 MMBtu/hr.      | 40 CFR 60 Subpart A          | <del>n/a</del> | <del>n/a</del>            |
|                 | natural gas/propane | 40 CFR 60 Subpart De         |                |                           |
|                 | fired boiler        | 40 CFR 63 Subpart A          |                |                           |
|                 |                     | 40 CFR 63 Subpart            |                |                           |
|                 |                     | DDDDD                        |                |                           |
|                 |                     | <del>391 3 1 .02(2)(d)</del> |                |                           |
|                 |                     | <del>391-3-102(2)(g)</del>   |                |                           |

\* 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.

#### 3.2 Equipment Emission Caps and Operating Limits

#### MODIFIED CONDITION

- 3.2.1 The Permittee shall process no more than one (1) tank car of each the following commodities during any 24 consecutive hour period.[Toxic Guideline, 391-3-1-.02(2)(a)(1)]
  - a. Bromine
  - b. Methyl Chlorosilanes
  - c. Methyl Dichlorosilanes
  - d. Methyl Trichlorosilanes
  - e. Trichlorosilanes
  - f. Methyl Isocynate
  - g. Methylene Diisocyanate
  - h. Nitrosyl Chloride
  - i. Benzene
  - j. Chlorform
  - k. Hydrogen Bromide
  - l. Hydrogen Chloride

#### MODIFIED CONDITION

3.2.3 The Permittee shall burn natural gas and/or propane only in the boilers B001, or B002, and B003.

[391-3-1-.03(2)(c) - PSD Avoidance]

#### NEW CONDITION

The Permittee shall not clean or purge tank cars containing ammonia, benzene, butadiene, methyl bromide, formaldehyde or vinyl chloride. [Toxic Guideline, 391-3-1-.02(2)(a)(1)]

#### NEW CONDITION



5 The Permittee shall not discharge or cause the discharge into the atmosphere from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013), formaldehyde in amounts equal to or exceeding 0.01 tons and 0.27 tons, respectively, or 0.28 tons combined during any rolling 12-month basis period. [Toxic Guideline, 391-3-1-.02(2)(a)(1)]

### NEW CONDITION



<u>The Permitting shall not operate either Boiler B001or Boiler B002 in an amount equal to or exceeding 4,300 hours during any rolling 12-month basis period.</u> [Toxic Guideline, 391-3-1-.02(2)(a)(1)]

#### **3.3** Equipment Federal Rule Standards

#### 40 CFR Part 63 Subpart ZZZZ

#### DELETED CONDITION

3.3.3 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63, Subpart A "General Provisions," and Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of I.C. Engine C19. [40 CFR 63 Subpart A and Subpart ZZZZ]

#### DELETED CONDITION

3.3.4 The Permittee shall comply with the following operating limitations for the operation of I.C.
 Engine C19:
 [40 CED (2) (C02 and Item 11 of Table 2) to 40 CED (2) Submert 77771

[40 CFR 63.6602 and Item 11 of Table 2c to 40 CFR 63 Subpart ZZZZ]

a. Limit concentration of formaldehyde in the stationary RICE exhaust to 10.3 ppmvd or less at 15 percent O<sub>2</sub>.

#### DELETED CONDITION

- 3.3.5 For the operation of the I.C. Engine C19, the Permittee shall:
  - b. Comply with the emission limitations and operating limitations specified in Condition 3.3.4 at all times except during periods of startup.
     [40 CFR 63.6605(a) and Table 2c to 40 CFR 63 Subpart ZZZZ]
  - Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
     [40 CFR 63.6625(h)]
  - d. Operate and maintain the engines, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6605(b)]

#### 40 CFR 60 Subpart Dc

#### MODIFIED CONDITION

3.3.6 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" for operation of the boilers B001, and B002, and B003.
 [40 CFR 60.40c]

#### 40 CFR 63 Subpart DDDDD

#### MODIFIED CONDITION

- 3.3.8 The Permittee shall comply with the following work practice standards at all times during the operation of the boilers B001, and B002, and B003:
  [40 CFR 63.7490, 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(13), & Table 3 to 40 CFR Part 63, Subpart DDDDD]
  - a. Conduct annual tune-ups as applicable in accordance with Condition 5.2.12.
  - b. The first annual tune-up must be no later than 13 months after the initial startup of the boilers.
  - c. Each annual tune-up specified in Condition 5.2.12 must be no more than 13 months after the previous tune-up.
  - d. If the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

#### **3.4 Equipment SIP Rule Standards**

3.4.3 The Permittee shall not cause, let, suffer, permit or allow the emission of fly ash and/or other particulate matter from the boilers (Emission Unit ID Nos. B001, and B002, and B003) in amounts equal to or exceeding the allowable rate calculated as follows:

 $P = 0.5(10/R)^{0.5}$ ; for equipment with a rated capacity equal to or greater than 10 million BTU heat input per hour, or equal to or less than 250 million BTU heat input per hour [391-3-1-.02(2)(d)2(ii)]

Where:

P = allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input

R = heat input of fuel-burning equipment in million BTU per hour

#### MODIFIED CONDITION

3.4.4 The Permittee shall not cause, let, suffer, permit or allow the emissions from the boilers (Emission Unit ID Nos. B001, and B002, and B003), the opacity of which is equal to or greater than twenty (20) percent, except for one six-minute period per hour of not more than twenty-seven (27) percent opacity. [391-3-1-.02(2)(d)3]

# **3.5** Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

#### MODIFIED CONDITION

3.5.2 The Permittee shall operate and maintain the tankcar cleaning systems (ID Nos. 0016 old and 0016-new) such that the scrubbers (ID Nos. C16a old and C16a-new) and carbon adsorbers (ID Nos. C16b-old and C16b-new) provide an overall emission reduction efficiency of at least 98 percent.

[Toxic Guideline, 391-3-1-.02(2)(a)(1)]

#### MODIFIED CONDITION

3.5.3 The Permittee shall operate and maintain the tankcar cleaning systems (ID Nos. 0016-old and 0016-new) such that the system provides an overall emission reduction efficiency of at least 98 percent for chlorofluorocarbons (CFC) vented to the system. [Toxic Guideline, 391-3-1-.02(2)(a)(1)]

#### MODIFIED CONDITION

3.5.4 The Permittee shall operate and maintain the organic commodity pressurized tank car gas purge system (ID No. 0017) and flammable commodities purge system (ID No. 0019) such that it's the flares (ID Nos. C17 and ID No. 28) is are operating and provides an overall emission reduction efficiency of at least 99 98 percent each. [Toxic Guideline, 391-3-1-.02(2)(a)(1)]

| <del>3.5.5</del> | DELETED CONDITION<br>The Permittee shall flare (ID No. C17) all tank cars containing methyl bromide for at least a<br>3 hour period.<br>[Toxic Guideline, 391-3-102(2)(a)(1)]  |
|------------------|--|
| <del>3.5.6</del> | DELETED CONDITION<br>The Permittee shall not flare (ID No.C17) more than 2,125 pounds of methyl bromide during<br>any 2-consecutive hour period.<br>[Toxic Guideline, 391-3-102(2)(a)(1)]  |
| <del>3.5.7</del> | DELETED CONDITION<br>The Permittee shall operate and maintain the flare (ID No.C17) such that it provides an<br>overall emission reduction efficiency of at least 99.5 percent when flaring ammonia.<br>[Toxic Guideline, 391-3-102(2)(a)(1)]  |
| <del>3.5.8</del> | DELETED CONDITION<br>The Permittee shall operate and maintain the organic commodity pressurized tank car gas<br>purge system (ID No. 0017) such that its flare (ID No. C28) is operating and provides an<br>overall emission reduction efficiency of at least 98 percent.<br>[Toxic Guideline, 391-3-102(2)(a)(1)]   |
| <del>3.5.9</del> | DELETED CONDITION<br>The Permittee shall operate and maintain the Flammable Commodities Purge System (ID No.<br>0019) such that I.C. Engines (ID Nos. C19, C24, and C25) provides an overall emission<br>reduction efficiency of at least 99 percent.<br>[Toxic Guideline, 391-3-102(2)(a)(1)]   |
| 3.5.11           | MODIFIED CONDITION<br>The Permittee shall operate and maintain the tankcar cleaning system (ID No. 0016-new)<br>such that the scrubbers and carbon adsorbers (ID Nos. <u>C16a/C16c</u> and <u>C16b/C16d</u> ,<br>respectively) provide an overall emission reduction efficiency of at least 98 percent while a<br>railcar is vented to.<br>[Toxic Guideline, 391-3-102(2)(a)(1)] |
|                  | MODIFIED CONDITION   |

3.5.12 The Permittee shall vent the process gases (Source codes: <del>0016 0ld and</del> 0016-new) through a Carbon Adsorption System (CAS) consisting of at least two activated carbon canisters that are connected in series. [391-3-1-.02(a)(10)]

#### PART 4.0 REQUIREMENTS FOR TESTING

#### 4.1 General Testing Requirements

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

Condition 4.1.3 a. through Condition 4.1.3.n no changes.

••••

DELETED

 Method 320 or 323 shall be used for the determination of formaldehyde concentration when determining compliance with the emission limit specified in Condition 3.3.4.
 [40 CFR 63.6612(a) and Items 2 and 3 of Table 4 to 40 CFR 63 Subpart ZZZZ]

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

#### PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

#### 5.2 Specific Monitoring Requirements

#### MODIFIED CONDITION

5.2.1 The Permittee shall measure and record the pH for the Venturi scrubbers (ID Nos. C16a-old, C16a-new, and C16c). These measurements shall be taken each day of operation that a railcar is vented to the scrubber and recorded in a logbook with the time and date of the pH reading. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

#### MODIFIED CONDITION

- 5.2.2 The Carbon Adsorption Systems (ID Nos. C16b-old, C16b-new, and C16d) shall be sampled once every week while the gases are exhausted through the Carbon adsorption system to determine breakthrough of volatile organic compounds (VOC). The sampling point <u>of each</u> <u>system</u> shall be at the outlet of the final polishing canister. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
  - The VOC sampling and analysis shall be performed using an instrument with a Photo ionization detector (PID), or Division approved alternative detector. The instrument/PID must meet all requirements specified in Section 8.1 of EPA Method 21 (40 CFR 60, Appendix A).

#### DELETED CONDITION

5.2.7 The Permittee shall perform a check to ensure that I.C. Engines (ID Nos. C19, C24, and C25) are in operation when a railcar is sent to the Flammable Commodities Purge System (ID No. 19) and that the engines are shut down before any railcar sent to the engines is disconnected. The Permittee shall maintain a log that may be in the form of a checklist showing this proper operation of the IC Engines.

[391-3-1-.02(6)(b) 1 and 40 CFR 70.6(a)(3)(i)]

#### MODIFIED CONDITION

- 5.2.13 The Permittee shall conduct a tune-up for each of the boilers B001, and B002, and B003 annually as applicable as specified in the paragraphs below: [40 CFR 63.7540(a)(10)]
  - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications if available;
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).

- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- f. Maintain on-site and submit if requested by the Division, an annual report containing the following information:
  - i. The concentrations of CO in the effluent stream in parts per million by volume and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
  - ii. A description of any corrective actions taken as a part of the tune-up; and
  - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

#### NEW CONDITION

5.2.17 The Permittee shall maintain and operate its existing electronic operating hours system on each of the boilers (Emission Unit ID Nos. B001and B002) to continuously measure the operating hours of each of the boilers (Emission Unit ID Nos. B001 and B002). Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

#### **PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**

#### 6.1 **General Record Keeping and Reporting Requirements**

#### MODIFIED CONDITION

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any a. condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - i. None required to be reported in accordance with Condition 6.1.4.
- Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any b. condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any 12-month rolling total of VOC emissions equal or exceeding 112 tons.
  - ii. Any instance in which more than one railcar of the commodities listed in Condition No. 3.2.1 is cleaned during any 24 consecutive hour period.
  - Any instance in which more than 2 railcars of chlorine are cleaned in a 24-hour iii. period.

DELETED

iv. Any instance in which a tank car containing methyl bromide is not flared (ID No. C17) for at least a 3-hour period.

DELETED

- Any instance in which more than 2,125 pounds of methyl bromide is flared (ID ₩. No. C17) during any 2-consecutive hour period.
- vi. For the Compliant Material Option specified in Condition 3.3.2a, the use of a coating with an organic HAP content that exceeds the applicable emission limit(s) in Condition 3.3.1, or the use of a thinner and/or additive, or cleaning material that does not meet the "no HAP content" limit specified in Condition 3.3.2a.
- vii. For the Emission Rate Without Add-on Controls Option specified in Condition 3.3.2b, a calculated 12-month rolling rate of organic HAP emission that exceeds the applicable emission limit(s) specified in Condition 3.3.1.

NEW CONDITION

viii. Any time the Permittee cleans or purges tank cars containing ammonia, benzene, butadiene, methyl bromide, formaldehyde or vinyl chloride.

NEW CONDITION

ix. Any formaldehyde emissions in amounts equal to or exceeding 0.01 tons from the Exterior Painting Operation (ID No. 0009) and 0.27 tons from Interior Painting/Lining Operation (ID No. 0013) or 0.28 tons combined during any 12month rolling total period from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013).

NEW CONDITION

- <u>x.</u> Any time either Boiler B001 or Boiler B002 operates in an amount equal to or exceeding 4,300 hours during any 12-month rolling total period.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
  - i. Any instance in which the paint arrestor filters on the Exterior Painting Operation (ID No. 0009), the Interior Lining Operation (ID No. 0013), or the Small Parts Painting and Touchup Operations (ID No. 0020) are not changed as required by Condition No. 3.5.1.

#### MODIFIED CONDITION

ii. Any instance in which a railcar is vented to the Venturi scrubbers (ID Nos. C16aold, C16a-new, and/or C16c) with a scrubbant pH less than 7 as recorded per Condition No. 5.2.1.

#### MODIFIED CONDITION

- iii Any instance in which carbon adsorbers (ID Nos. C16b old, C16b new, and/or C16d) are is not changed within 24 hours of indication of VOC breakthrough as determined by Condition 5.2.3.
- iv. Any instance in which the monitoring device required by condition 5.2.4.a indicates that the flame to the flare (ID No. C17) is not present while railcars are being vented to the flare.
- v. Any occurrence of visible emissions from the flare (ID No. C17) that occur during the visible emissions check required by Condition 5.2.5 or any failure to perform the visible emissions check.

#### DELETED CONDITION

 vi. Any instance that the Permittee does not meet the operating limitations specified in Condition 3.3.5.
 [40 CFR 63.6640(b)] DELETED CONDITION

- vii. Any instance in which a railcar is disconnected from the I.C. Engines (ID Nos. C19, C24, and C25) before the IC Engine shuts off.
- viii. Any failure to replace the filters of baghouses C8, C11, C26, and C27 within 24 hours after a required pressure drop reading of the baghouse filters indicates a pressure drop outside the range specified in Condition 3.5.10.
- ix. Any period during which the visible emissions from any baghouse (Air Pollution Control Devices C8, C11, C26, and C27) equal or exceeds 10 percent opacity and is not corrected within 24 hours.
- x. Any problem revealed by the baghouse inspections, required by Condition 5.2.9, that are not corrected within 24 hours.
- xi. Any instance in which the monitoring device required by condition 5.2.4.b indicates that the flame to the flare (ID No. C28) is not present while railcars are being vented to the flare.
- xii. Any occurrence of visible emissions from the flare (ID No. C28) that occur during the visible emissions check required by Condition 5.2.6 or any failure to perform the visible emissions check.
- xiii. Any failure to replace the filters of baghouse C30 within 24 hours after a required pressure drop reading of the baghouse filters indicates a pressure drop outside the range specified in Condition 3.5.13.
- xiv. Any two consecutive required daily determination of visible emissions requiring action by Condition 5.2.15 and is not corrected within 24 hours.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
  - i. Any failure to conduct the tune-up required by Condition 5.2.13.

#### 6.2 Specific Record Keeping and Reporting Requirements

#### MODIFIED CONDITION

6.2.4 The Permittee shall maintain records of each railcar cleaned. These records shall include a description of the residual material contained in the car, and the time and date the cleaning operation occurred. These records should contain additional information for each railcar of methyl bromide cleaned, including the amount of methyl bromide sent to the flare and the length of time each railcar of methyl bromide is cleaned. These records shall be used to demonstrate compliance with the operating limits in Condition Nos. 3.2.1, 3.2.2, 3.5.6, and 3.5.7 and 3.2.4.
[391-3-1-.02(6)(b)1. and 391-3-1-.03(2)(c)]

#### MODIFIED CONDITION

6.2.5 The Permittee shall maintain records of the date and time that the filters for C8, C9, C11, C13, C20, <u>C22</u>, C26, and C27, and C30 are changed. These records may be kept in the form of a log and shall be kept available for inspection or submittal for five years from the date of record.

[391-3-1-.02(6)(b)1. and 391-3-1-.03(2)(c)]

#### 40 CFR 63 Subpart ZZZZ

#### DELETED CONDITION

- 6.2.18 The Permittee shall submit, with the report required by Condition 6.1.4, a semiannual report that contains a compliance report with the following records. The records shall be available for inspection or submittal to the Division upon request and contain:
   [40 CFR 63.6650(a), (b), (c), (d), and (f); Item 1 of Table 7 to 40 CFR 63 Subpart ZZZZ; 40 CFR 70.6(a)(3)(i); and 391 3 1 .02(6)(b)1]
  - a. Company name and address.
  - b. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - e. Date of report and beginning and ending dates of the reporting period.
  - d. Any deviation from any operating limitations that is specified in Condition 6.1.7.c.vi.
  - e. If there was a malfunction or deviation specified in Paragraph d during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction/deviation which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with Condition 3.3.5.c, including actions taken to correct a malfunction.
  - f. If there are no deviations specified in Paragraph d, the compliance report must include a statement that there were no deviations from the emission or operating limitations during the reporting period.

#### DELETED CONDITION

6.2.19 For the operation of the I.C. Engine C19, the Permittee shall keep and maintain the following records:

[40 CFR 63.6655(a), 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1]

a. A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).

- b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- c. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment.
- e. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.3.5.c, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

#### 40 CFR Part 60 Subpart Dc

#### MODIFIED CONDITION

6.2.20 The Permittee shall submit notification of the date of actual startup of the boilers B001, and B002, and B003, as provided by 40 CFR 60.7 of this part. This notification shall include all items specified in 40 CFR 60.48c(a).
 [40 CFR 60.48c(a)]

#### MODIFIED CONDITION

6.2.21 The Permittee shall record and maintain records of the amount of each fuel combusted in the boilers B001, and B002, and B003 during each calendar month as required by Permit Condition 5.2.12.
 [40 CFR 60.48c(g)(2)]

#### 40 CFR Part 63 Subpart DDDDD

#### MODIFIED CONDITION

- 6.2.23 The Permittee shall submit annual compliance reports, as applicable, for boilers B001, and B002, and B003 in accordance with the following requirements:
  [40 CFR 63.7495, 40 CFR 63.7550(a)&(b) & 40 CFR 63.7550(h)(3)]
  - a. The first compliance report must cover the period beginning on the startup of each boiler and ending on December 31 within 1 year upon startup of each boiler.
  - b. The first compliance report must be postmarked or submitted no later than January 31 following the end of the calendar year.
  - c. Each subsequent annual compliance report must cover the applicable 1-year period from January 1 to December 31.
  - d. Each subsequent compliance report must be postmarked or submitted no later than January 31 following the end of the annual reporting period.

e. All reports must be submitted electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the report must be submitted to U.S. EPA at the appropriate address listed in 40 CFR 63.13. At the discretion of U.S. EPA, these reports must also be submitted in the format specified by U.S. EPA.

#### MODFIED CONDITION

- 6.2.24 The Compliance reports required in Condition 6.2.23 shall contain the following information: [40 CFR 63.7550(c)(5) & Table 9 to 40 CFR Part 63, Subpart DDDDD]
  - a. Company and Facility name and address.
  - b. Process unit information, emissions limitations, and operating parameter limitations, as applicable.
  - c. Date of report and beginning and ending dates of the reporting period.
  - d. The total operating time during the reporting period.
  - e. The date of the most recent tune-up for the boilers B001<del>, and B002, and B003</del>. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
  - f. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

#### MODIFIED CONDITION

- 6.2.25 To comply with the reporting requirements of 40 CFR, Part 63, Subpart DDDDD for boilers B001, and B002, and B003, the Permittee shall maintain the following records for 5 years following the date of each occurrence, report, or record, as applicable, according to 40 CFR 63.10(b)(1) (minimum of 2 years on site and the remaining 3 years may be offsite). The records shall be kept on site, or be accessible from onsite (for example, through a computer network), in a form suitable and readily available for expeditious review upon request. [40 CFR 63.7555(a)]
  - a. A copy of each notification and report submitted to comply with 40 CFR, Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance report submitted, according to the requirements in 40 CFR63.10(b)(2)(xiv).
  - b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

#### MODIFIED CONDITION

- 6.2.26 The Permittee shall keep the following records of the Carbon Adsorption Systems (ID Nos. <del>C16b old,</del> C16b-new, and C16d) monitoring required by Condition 5.2.3: [391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]
  - a. Sample time and date.
  - b. Monitoring results (ppmv).
  - c. Corrective action taken including the time and date of that action.
  - d. Process operations occurring at the time of sampling.

#### NEW CONDITION

6.2.28 The Permittee shall maintain monthly usage records of all formaldehyde-containing materials used from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013). These records shall include the total weight of each material used and the formaldehyde content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the formaldehyde content of waste materials from the formaldehyde emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the formaldehyde content of the containerized waste material, and documentation of the method for determining the formaldehyde content of the waste material. [391-3-1-.02(6)(b)1]

#### NEW CONDITION

6.2.29 The Permittee shall use the records required in Condition 6.2.28 to determine the total monthly emissions of formaldehyde from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013). All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in Condition 6.2.28. The Permittee shall notify the Division in writing if formaldehyde emissions exceed 0.0008 tons from the Exterior Painting Operation (ID No. 0013), or if formaldehyde emissions from the Interior Painting/Lining Operation (ID No. 0013), or if formaldehyde emissions from both operations combined exceed 0.0233 tons from the Exterior Painting Operation (ID No. 0013), during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 3.2.5. [391-3-1-.02(6)(b)1]

#### NEW CONDITION

6.2.30 The Permittee shall use the calculations required by Condition 6.2.29 to determine the twelve month rolling total formaldehyde emissions for each month and the twelve month rolling total combined formaldehyde emissions for each month from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013) for each calendar month. The Permittee shall notify the Division in writing if the combined formaldehyde emissions from both the Exterior Painting Operation (ID No. 0009) and Interior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013) equal or exceed 0.28 tons and/or any individual formaldehyde emissions from either the Exterior Painting Operation (ID No. 0009) or Interior Painting/Lining Operation (ID No. 0013) equal or exceed 0.01 tons and 0.27 tons, respectively, during any twelve month rolling period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 3.2.5. [391-3-1-.02(6)(b)1]

#### NEW CONDITION

- 6.2.31 <u>The Permittee shall use the following equations when calculating the monthly formaldehyde</u> emissions from the Exterior Painting Operation (ID No. 0009) and Interior Painting/Lining Operation (ID No. 0013) in accordance with Condition 6.2.29. All calculations should be kept as part of the monthly record. [391-3-1-.02(6)(b)1]
  - <u>a.</u> Formaldehyde<sub>i</sub> (lbs) = Material use (lbs) \* (percent weight Formaldehyde); or
  - b. Formaldehyde<sub>i</sub> (lbs) =Material used (gallons) \* (Formaldehyde Content lbs/gallon); or
  - c. Formaldehyde<sub>w</sub> (lbs) = Waste Material (lbs) \* (percent weight Formaldehyde); or
  - <u>d.</u> Formaldehyde<sub>w</sub> (lbs) = Waste Material (gallons) \* (Formaldehyde Content lbs/gallon)
  - <u>e.</u> Total Individual Formaldehyde (lbs) =  $(\sum_{i=1}^{n} \text{Formaldehyde}_{i} \sum_{w=1}^{n} \text{Formaldehyde}_{w})$

#### NEW CONDITION

6.2.32 The Permittee shall use the electronic monitoring systems required by Permit Condition 5.2.17 to determine and record the operating hours for each of the boilers (Emission Unit ID Nos. B001 and B002) during every calendar month. The Permittee shall use these records to determine the total twelve rolling month operating hours for each of the boilers (Emission Unit ID Nos. B001and B002). These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

The quantity of monthly operating hours shall be reported in the semi-annual report required by Permit Condition 6.1.4. [391-3-1-.02(6)(b)1]

### Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

#### ATTACHMENT A

#### List Of Standard Abbreviations

| AIRS                   | Aerometric Information Retrieval System       |
|------------------------|---|
| APCD                   | Air Pollution Control Device                  |
|                        |   |
| ASTM                   | American Society for Testing and Materials    |
| BACT                   | Best Available Control Technology             |
| BTU                    | British Thermal Unit                          |
| CAAA                   | Clean Air Act Amendments                      |
| CEMS                   | Continuous Emission Monitoring System         |
| CERMS                  | Continuous Emission Rate Monitoring System    |
| CFR                    | Code of Federal Regulations                   |
| CMS                    | Continuous Monitoring System(s)               |
| СО                     | Carbon Monoxide                               |
| COMS                   | Continuous Opacity Monitoring Stystem         |
| dscf/dscm              | Dry Standard Cubic Foot / Dry Standard Cubic  |
|                        | Meter   |
| EPA                    | United States Environmental Protection Agency |
| EPCRA                  | Emergency Planning and Community Right to     |
|                        | Know Act                                      |
| gr                     | Grain(s)                                      |
| GPM (gpm)              | Gallons per minute                            |
| H <sub>2</sub> O (H2O) | Water   |
| HAP                    | Hazardous Air Pollutant                       |
| HCFC                   | Hydro-chloro-fluorocarbon                     |
| MACT                   | Maximum Achievable Control Technology         |
| MMBtu                  | Million British Thermal Units                 |
| MMBtu/hr               | Million British Thermal Units per hour        |
| MVAC                   | Motor Vehicle Air Conditioner                 |
| MW                     | Megawatt                                      |
| NESHAP                 | National Emission Standards for Hazardous Air |
|                        | Pollutants                                    |
| NO <sub>x</sub> (NOx)  | Nitrogen Oxides                               |
| NSPS                   | New Source Performance Standards              |
| OCGA                   | Official Code of Georgia Annotated            |

| PM                    | Particulate Matter                             |
|-----------------------|--|
| PM <sub>10</sub>      | Particulate Matter less than 10 micrometers in |
| (PM10)                | diameter                                       |
| PPM (ppm)             | Parts per Million                              |
| PSD                   | Prevention of Significant Deterioration        |
| RACT                  | Reasonably Available Control Technology        |
| RMP                   | Risk Management Plan                           |
| SIC                   | Standard Industrial Classification             |
| SIP                   | State Implementation Plan                      |
| SO <sub>2</sub> (SO2) | Sulfur Dioxide                                 |
| USC                   | United States Code                             |
| VE                    | Visible Emissions                              |
| VOC                   | Volatile Organic Compound                      |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |
|                       |  |

#### List of Permit Specific Abbreviations

#### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

| Category                                      | INSIGNIFICANT ACTIVITIES CHECKLIST Description of Insignificant Activity/Unit   | Quantity |
|---|---|----------|
| Mobile Sources                                | 1. Cleaning and sweeping of streets and paved surfaces  | 1        |
| Combustion<br>Equipment                       | 1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.   | 1        |
|   | <ol> <li>Small incinerators that are not subject to any standard, limitation or other requirement under<br/>Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated<br/>facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for<br/>Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:</li> </ol> |          |
|   | i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.   |          |
|   | ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste<br>by weight combined with types 0, 1, 2, and/or 3 waste.   |          |
|   | iii) Less than 4 million BTU/hr heat input firing type 4 waste.<br>(Befer to $\frac{201}{3}$ = $\frac{1}{10}$ $\frac{2}{(10)(g)}$ (ii) for descriptions of waste types)   |          |
|   | <ul><li>(Refer to 391-3-103(10)(g)2.(ii) for descriptions of waste types)</li><li>3. Open burning in compliance with Georgia Rule 391-3-102 (5).</li></ul>  |          |
|   | 4. Stationary engines burning:  |          |
|   | <ul> <li>Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as<br/>emergency generators shall not exceed 500 hours per year or 200 hours per year if subject<br/>to Georgia Rule 391-3-102(2)(mmm).7</li> </ul>   |          |
|   | <ul> <li>Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or<br/>standby power generation, where the combined peaking and standby power generation do<br/>not exceed 200 hours per year.</li> </ul>   |          |
|   | <ul> <li>Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of<br/>each engine does not exceed 400 horsepower and that no individual engine operates for<br/>more than 2,000 hours per year.</li> </ul>   |          |
|   | iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.   |          |
| Trade Operations                              | 1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.   | 1        |
| Maintenance,<br>Cleaning, and<br>Housekeeping | 1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.   |          |
|   | 2. Portable blast-cleaning equipment.   | 4        |
|   | 3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.  |          |
|   | 4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.   |          |
|   | 5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.  | 10       |
|   | 6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.   |          |
|   | 7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.  |          |

#### INSIGNIFICANT ACTIVITIES CHECKLIST

# INSIGNIFICANT ACTIVITIES CHECKLIST

| Category                    | Description of Insignificant Activity/Unit  | Quantity |
|-----------------------------|---|----------|
| Laboratories<br>and Testing | 1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.   | 1        |
|                             | 2. Research and development facilities, quality control testing facilities and/or small pilot projects, where   |          |
|                             | combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.   |          |
| Pollution<br>Control        | 1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.   |          |
|                             | 2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.  |          |
|                             | 3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.  |          |
|                             | 4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.  |          |
| Industrial                  | 1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less  |          |
| Operations                  | than 125,000 tons per year.   |          |
| -                           | 2. Any of the following processes or process equipment which are electrically heated or which fire natural  |          |
|                             | gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per   |          |
|                             | hour:   |          |
|                             | <ul> <li>Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-<br/>coated parts.</li> </ul>  |          |
|                             | ii) Porcelain enameling furnaces or porcelain enameling drying ovens.   |          |
|                             | iii) Kilns for firing ceramic ware.   |          |
|                             | iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not   |          |
|                             | <ul><li>conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.</li><li>v) Bakery ovens and confection cookers.</li></ul>   |          |
|                             | vi) Feed mill ovens.  |          |
|                             | vii) Surface coating drying ovens   |          |
|                             | <ul> <li>3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:</li> <li>i) Activity is performed indoors; &amp;</li> </ul> | 1        |
|                             | ii) No significant fugitive particulate emissions enter the environment; &  |          |
|                             | iii) No visible emissions enter the outdoor atmosphere.   |          |
|                             | 4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).  |          |
|                             | 5. Grain, food, or mineral extrusion processes  |          |
|                             | 6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.  |          |
|                             | 7. Equipment for the mining and screening of uncrushed native sand and gravel.  |          |
|                             | 8. Ozonization process or process equipment.  |          |
|                             | 9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.  |          |
|                             | 10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.   |          |
|                             | 11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.  |          |
|                             | 12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.  |          |
|                             | 13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.   |          |

# INSIGNIFICANT ACTIVITIES CHECKLIST

| Category                       | Description of Insignificant Activity/Unit  | Quantity |
|--------------------------------|---|----------|
| Storage Tanks and<br>Equipment | 1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.   |          |
|                                | 2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. |          |
|                                | 3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.   | 2        |
|                                | 4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.   | 2        |
|                                | 5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.                            |          |
|                                | 6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.   |          |
|                                | 7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).   | 9        |

# INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

| Description of Emission Units / Activities |   |
|--|---|
| Fugitives from Unloading LPG               | 1 |
| Interior blast cabinet                     | 1 |
| Rubber Lining Repair Operation             | 1 |

#### ATTACHMENT B (continued)

#### **GENERIC EMISSION GROUPS**

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

|   | Number                       | Applicable Rules |                           |  |
|---|------------------------------|------------------|---------------------------|--|
| Description of Emissions Units / Activities | of Units<br>(if appropriate) | NITO Process     | Fugitive Dust<br>Rule (n) |  |
| n/a   |                              |                  |                           |  |

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

| Description of Fuel Burning Equipment  | Number of Units |
|--|-----------------|
| Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.                      | 1               |
| Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG. | <u>+1021</u>    |
| Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.   | 4               |

## ATTACHMENT C

### LIST OF REFERENCES

- 1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
- 2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
- 3. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.
- 4. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.
- 5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/ap42/index.html*.
- 6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/software/tanks/index.html*.
- 7. The Clean Air Act (42 U.S.C. 7401 et seq).
- 8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
- 9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).