

**South Carolina Department of Health and Environmental Control (SC DHEC)
Bureau of Air Quality (BAQ)**

**Response to Comment
Public Notice #14-052-TV-RE
Guardian Industries, LLC Title V Operating Permit
Richburg, Chester County, South Carolina
Permit No. TV-0640-0018**

The following is the SC DHEC BAQ's (Department) response to the comment made during the formal comment period held May 30th through June 28th, 2014, regarding the draft Title V operating permit renewal for Guardian Industries, LLC located at 610 L&C Railway Distribution Park in Richburg, Chester County, South Carolina. The Department Decision, permit, statement of basis, this response document, and a letter of notification to the citizen who submitted comments are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, or our [webpage](http://www.scdhec.gov/Environment/AirQuality/PermittingDecisions/) at <http://www.scdhec.gov/Environment/AirQuality/PermittingDecisions/>. Hardcopies of all the above-listed documents, as well as the written comment received can be requested by contacting our Freedom of Information Office at (803) 898-3882.

Comment - The commenter requested the placement of a comprehensive ambient air monitoring station. The commenter questioned how the Department could determine a facility was in compliance with its permit without an air monitoring station. The commenter asked to be provided the scientific basis and specific procedures to determine compliance without monitoring. Additionally, the commenter requested a hearing.

Ambient Air Quality Monitor Request - Ambient air quality monitoring is required by the Environmental Protection Agency (EPA) through the Clean Air Act to determine whether a geographical area is meeting the National Ambient Air Quality Standards (NAAQS). The ambient monitor collects and measures samples of air pollutants to evaluate their concentration in the ambient air as compared to the NAAQS. The EPA has established regulations that govern where permanent monitors must be placed. Monitors are not placed at individual facilities unless required by regulation. The Department annually reviews the monitoring network to make sure minimum requirements and the needs of the air program are met. The Annual Ambient Air Network Monitoring Plan is made available for public review and EPA approval to incorporate network changes that may be needed to meet new requirements,

address new questions, or redirect resources. The current monitoring network does not have an ambient monitor for Chester County.

Permit Compliance Monitoring - Ambient monitoring is used to determine air quality as related to the NAAQS in a designated area, measuring pollution from all emissions in the area including emissions from cars, trucks, buses, home fireplaces, outdoor burning, gas stations, and other industries. Stationary source monitoring is conducted at individual manufacturing plants and is used to demonstrate compliance with applicable regulatory requirements in that permit. Monitoring specified in a permit is related to the equipment or group of equipment that emits air pollution and is used to demonstrate that the facility is in compliance with its permit requirements. This type of monitoring is based on regulatory requirements, the type of air pollution control devices, manufacturer's recommendations, use of the EPA guidance and other types of guidance, historical information, and engineering judgment. The most common forms of monitoring are parametric monitoring (e.g., pressure drop across a dust collector, temperature in a thermal oxidizer), operations monitoring (e.g., production rates, fuel usage rates) and direct measurement of emissions (stack testing). These types of monitoring are used to demonstrate compliance with regulatory requirements in construction and operating permits nationally, including permits issued by the EPA.

Guardian Industries, LLC is subject to the Title V operating permit regulation as well as other state and federal requirements. The Title V regulation requires the permit contain "...compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit." The Title V operating permit limits the amounts of sulfur dioxide, nitrogen dioxide, particulate matter, and sulfuric acid emissions and opacity. Control devices are required to be operating at all times the sources are in operation. The control systems are required to be tested every two years to ensure emissions are limited as required by the permit. Process and control device parameters are required to be monitored and operated in ranges specified in the permit to ensure they are operating properly. Inspections and recordkeeping are also required to ensure the control system is operating properly. Additionally, the facility must report their monitoring activities every 6 months, certify to their proper operation on an annual basis, and report their actual emissions inventory every three years. The Department routinely inspects the facility; reviews emission reports; reviews stack test protocols and stack test results; and is present at the time of the stack test if resources allow. During the renewal of this operating permit, these monitoring parameters and ranges have been updated based on operational history of the

control devices and most recent stack test results. The facility's emissions are below the regulatory limits with control devices functioning properly. Therefore, this permit contains sufficient monitoring for the facility to demonstrate compliance with all applicable requirements.

Public Hearing Request - The Department received one request for a public hearing. The Department did not hold a public hearing on this permit because there was not a significant amount of public interest in this permit renewal. DHEC's Bureau of Air Quality has implemented the Chester Air Quality Coalition. The coalition serves as a means to communicate how DHEC monitors the air along the I-77 corridor as well as other air-related issues. If you have any interest in participating in this coalition, please contact Leslie Coolidge at coolidln@dhec.sc.gov.

Changes to the Draft Permit after Public Notice - The draft permit has been modified since it was noticed. The modifications included updating the permit to the current template, incorporating regulatory changes, and minor changes to Compliance Assurance Monitoring (CAM). None of these modification resulted in relaxation of permit conditions.

The specific changes and the cause are summarized below:

Template changes throughout the permit. This includes renumbering sections and updated template condition (majority of these changes are outlined below).

Condition C.3 is now C.13 and condition updated due to template changes.

Condition C.4 is now C.3 and condition updated due to template changes.

Condition C.5 is updated due to template changes and to incorporate facility comments.

Condition C.6 is now C.4.

Condition C.7 is now C.6.

Condition C.8 is now C.7 – Added equipment and control device ID's that will require visual inspection. The sources that vent indoors have been removed from this requirement since there would be no emissions into the atmosphere from these sources.

Condition C.9 is now C.8.

Condition C.10 is now C.9.

Condition C.11 is now C.10.

Condition C.12 is now C.11.

Condition C.13 is now C.12 – added regulatory citation at the beginning of the condition.

Condition C.14 is now C.15.

Condition C.15 is now C.16.

Condition C.16 is now C.17.

Condition C.17 is now C.18 and condition has been updated to incorporate consent decree requirements.

Condition C.18 is now C.19 and condition has been updated to incorporate consent decree requirements.

Condition C.19 is now C.20 – reworded 6 days/144 hours per facility comments.

Condition C.20 is now C.21.

Condition C.21 is now C.22.

Condition C.22 is now C.23.

Condition C.23 is now C.24 and condition has been updated to incorporate facility comments.

Condition C.24 is now C.14 and condition has been updated to incorporate consent decree requirements.

Condition C.25 has been removed. The facility has installed CEMs which will be utilized to demonstrate the proper operation of the equipment. Air to fuel ratio is on longer necessary.

Condition C.26 is now C.25, condition and CAM plans have been updated. CAM for opacity and H₂SO₄ has been added. CAM ranges have been updated based on most recent stack test and operation history. CAM parameter for PM emissions from ESP has been changed from voltage and currents in fields 1 and 2 to total power input (see CAM regulatory review for details). The facility will utilize CEMs for NO_x and SO₂

monitoring. Added language to exclude emissions resulting during bypass of control device from CAM limits. QA/QC practices have been modified for more thorough monitoring and proper operation of the control devices.

Condition C.27 is now C.46 and condition updated to reflect template changes.

Condition C.28 is now C.43 and condition updated to reflect template changes.

Condition C.29 is now C.41.

Condition C.30 is now C.42 and is updated due to recent regulation changes (SO₂ limit for SC Regulation 61-62.5, Standard 1 changed from 3.5 lb/million Btu to 2.3 lb/million Btu).

Added conditions C.26-C.40 to incorporate consent decree requirements.

Added conditions C.44 and C.45 for clarification.

Part D is now Part H.

Part E is not Part I.

Part F is now Part D.

Part G is now Part E. Condition G.3 is now Condition E.3 and has been updated due to template changes.

Part H is now Part J.

Part I is now Part K.

Part J is now Part L.

Part K is now Part F.

Part L is now Part G.

Modeled Emission Rate Attachment has been updated due to template changes.

Following changes have been made due to facility's comments received March 16, 2016.

Facility name throughout permit and statement of basis changed to "Guardian Industries, LLC."

Control device 1808-DC added to equip ID 1.81 in table B.1.

Equipment description for ID 3.03 revised to cullet pad #3 on table B.5.

Equipment ID revised from 5.06 to 5.05 for glass cutter.

Removed ESP1/Scrubber from Condition C.6, this condition is for baghouse/dust collectors.

Incorporated 502(b)10 request dated May 19, 2017 into the permit – replace propane vaporizers Equipment IDs 1.48 and 1.49. This change only affected the installation date of these sources. This change did not trigger any new regulatory requirements.