

PERMIT AMENDMENT NO. 3295-165-0012-V-04-1

ISSUANCE DATE: 08/23/2024



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: U.S. Silica Company
Facility Address: 3949 Highway 17 S
Millen, Georgia 30442 (Jenkins County)
Mailing Address: 3949 Highway 17 S
Millen, Georgia 30442
Parent/Holding Company: U.S. Silica Company
Facility AIRS Number: 04-13-165-00012

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:

Construction and Operation of a second Kiln, associated bins, belt feeders, bucket elevators, screeners, conveyors, a natural gas-fired boiler, a diesel-powered emergency generator and associated air pollution control devices.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division.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. **3295-165-0012-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. **TV-769512** dated **October 27, 2023**; any other applications upon which this Amendment or Permit No. **3295-165-0012-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 **13** pages.

Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division



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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

U.S. Silica manufactures two categories of high-end products for clients in the asphalt roofing (Cool Roof Granules or CRG) and synthetic quartz (Cristobalite) markets. U.S. Silica is proposing a plant expansion project to construct a second production line to manufacture additional Cristobalite. For this purpose, U.S. Silica is proposing to install a second kiln (Kiln No. 2) and associated bins, belt feeders, bucket elevators, screeners, and conveyors. Kiln Line 2 will not process CRG; therefore, a spray dryer will not be installed as part of this project.

The Permittee also requested an update (decrease) to the potential to emit (PTE) for Kiln No. 1 (EU ID KLN1) based on recent engineering data. There are no modifications or changes in throughputs to the Kiln No. 1 as a result of this update.

The proposed Kiln Line 2 will only process Cristobalite and will not process CRG. The Cristobalite product uses sand as a raw material which is delivered by trucks and stored in silos. The sand is mixed in a paddle mixer with a 1 percent by weight sodium hydroxide solution which is added through a metering pump. The mixture is then calcined in the kiln. The Cristobalite product is grinded before being sold to the synthetic quartz market.

U.S. Silica is proposing to install two conveyors and one bucket elevator to transfer sand from existing silos to the proposed Kiln Line 2. PM emissions from the new equipment will be captured by a ventilation system and controlled by the existing Sand Unloading Nuisance baghouse. The new conveyors will be enclosed to minimize any fugitive emissions.

The mixture will be fed into proposed Kiln No. 2 via proposed conveyors. The Kaolin rotary calciner will slowly dry the material to drive off moisture and other impurities. The Kiln rotates as it fires a burner that will be rated at 40 MMBtu/hr and will be capable of heating the raw materials at a very slow rate to release bound moisture and volatiles. The kiln will be heated by a natural-gas, low nitrogen oxides (NO_x) burner. The Kiln No. 2 will also include a rotary cooler that introduces cooling air in the discharge end of the cooler. Emissions from the proposed Kiln No. 2 will be routed to the proposed Kiln No. 2 Baghouse for PM control.

The cristobalite product will be sent from the proposed Kiln No. 2 to a series of new equipment including bucket elevators, feed bins, conveyors and feeders. The new equipment will be captured by a ventilation system and controlled by the existing Sand Unloading Nuisance baghouse. Ultimately, the product will be sent to one screen for specification sizing before entering one of two proposed product QC bins. After, the material will be sorted through a product screen.

PM emissions from the QC and screen process will be controlled by a proposed dust collector. From the QC bins, the Cristobalite will pass through a pneumatic transporter which will send the product to existing storage silos which are controlled by a bin vent filter. From the silos, the product will be transported off-site.

An existing bucket elevator receives the final Cristobalite products and loads products to the trucks in the truck loadout area. PM emissions from the belt/bucket elevator and loadout area are controlled by a baghouse.

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The facility is proposing to install one 9.8 MMBtu/hr natural gas-fired boiler to provide steam for the second production line.

The facility is proposing to install one 1,500 kW diesel powered emergency generator to provide back-up power to the facility to account for the additional Kiln Line No. 2. The unit will be considered an insignificant activity.

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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 Additional Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
KLN2	Kiln No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(p)1 40 CFR 60 Subpart UUU 40 CFR 60 Subpart A	206-DSC-145,150,155,160	Kiln No. 2 Baghouses
L206-ELV-005	Kiln No. 2 Feed Bin Bucket Elevator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)1 40 CFR 60 Subpart OOO 40 CFR 60 Subpart A	Existing L205-DPIT-115A	Existing Sand Unloading Nuisance Baghouse
L206-BIN-015	Kiln No. 2 Feed Bin			
L206-BIN-080	Kiln No. 2 Recycle Feed Bin			
L206-ELV-075	Kiln No. 2 Recycle Feed Bucket Elevator			
L206-VCV-030	Kiln No. 2 Feed Conveyor			
L206-VCV-010	Kiln No. 2 Feed Bin Vibratory Conveyor			
L206-WCV-029	Kiln No. 2 Weigh Belt Feeder No. 1			
L206-WCV-096	Kiln No. 2 Weigh Belt Feeder No. 2			
L206-SCR-030	Flux Mixing Screw Conveyor			
L206-SCR-071	Kiln No. 2 Feed Hood Rejects Screw Conveyor			
206-BCV-830	Raw Sand Feed K2 Belt Conveyor			
106-ELV-830	Raw Sand Feed Bucket Elevator			

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
206-BCV-835	Raw Sand Feed K1 Belt Conveyor			
206-SCR-115	Kiln No. 2 Cooler Discharge Screw Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) 391-3-1-.02(2)(p)1 40 CFR 60 Subpart OOO 40 CFR 60 Subpart A	Proposed 306-DSC-965	Proposed Product Screen No. 3 Nuisance Dust Collector
306-SCN-943	Product Screen No. 3			
306-BIN-950	Product QC Bin 3A			
306-BIN-955	Product QC Bin 3B			
306-ELV-940	Kiln No. 2 QC 3 Bucket Elevator			
BLR2	Boiler No. 2 9.8 MMBTU/hr gas fired boiler	391-3-1-.02(2)(d) 40 CFR 63 Subpart DDDDD 40 CFR 63 Subpart A	N/A	N/A

* 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.

3.3 Equipment Federal Rule Standards

Amended Condition

3.3.8 The Permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) as found in 40 CFR Part 63, Subpart DDDDD – “National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters,” for all applicable equipment. In particular, the Permittee shall comply with the following work practice standards at all times during the operation of the natural gas fired Boilers **BLR1 and BLR2**:

[40 CFR 63.7490(d), 63.7495(b), 63.7499(i), 63.7500(a)(1) and 63.7505(a)]

- a. Conduct biennial tune-ups for any of the boilers not equipped with a continuous oxygen trim system in accordance with Condition 5.2.10.
[40 CFR 63.7500(a)(1), 63.7500(e) & Table 3 to 40 CFR Part 63, Subpart DDDDD]
- b. Conduct tune-ups for any of the boilers equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio every five (5) years in accordance with Condition 5.2.10.
[40 CFR 63.7500(a)(1)]

3.4 Equipment SIP Rule Standards

Amended Conditions

- 3.4.3 The Permittee shall not discharge or cause the discharge into the atmosphere from Boilers BLR1 **and** BLR2 any gases which exhibit 20% opacity or greater, except for one six-minute period per hour of not more than 27% opacity.
[391-3-1-.02(2)(d)]
- 3.4.4 The Permittee shall not cause, let, suffer, permit or allow the emission of fly ash and/or other particulate matter from Boilers BLR1 **and** BLR2 in amounts equal to or exceeding the allowable rate calculated as follows:
- i. $P = 0.5$ pounds per million BTU heat input; for equipment with a rated capacity of less than 10 million BTU heat input per hour
[391-3-1-.02(2)(d)2(i)]

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

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**Amended Conditions

- 5.2.8 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record each of the indicated parameters on the following equipment in accordance with the manufacturer's recommendations. 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]
- a. The gas temperature at the inlet of the baghouse system serving Kilns KLN1 **and** KLN2.
 - b. The slurry input rate (1-hour block average) to each spray dryer.
 - c. The kiln feed input rate (1-hour block average) to Kilns KLN1 **and** KLN2.
- 5.2.10 To demonstrate continuous compliance with the applicable work practice standards in Table 3 to 40 CFR Part 63, Subpart DDDDD, the Permittee shall conduct tune-ups every two (2) or five years (5), as applicable, on Boilers BLR1 **and** BLR2, and keep records of the tune-ups. The Permittee shall conduct the tune-ups while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. Each biennial tune-up or 5-year tune-up shall be conducted no more than 25 months or 61 months, respectively, after the previous tune-up and in accordance with the following procedure:
[40 CFR 63.7515(d), 63.7540(a)(10), (11), (12) & (13)]
- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The burner inspection may be delayed 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. The inspection may be delayed until the next scheduled boiler shutdown.
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the boiler is subject.

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- 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.
 - f. Maintain on-site and submit, if requested by the Division, a 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.
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler; and
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the boiler was physically and legally capable of using more than one type of fuel during that period. Boilers sharing a fuel meter may estimate the fuel use by each unit.
 - g. For any of the boilers equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio, the Permittee shall conduct a tune-up of the boiler every 5 years as specified in paragraphs (a) through (f) of this condition to demonstrate continuous compliance. The burner inspection may be delayed until the next scheduled or unscheduled boiler shutdown, but the inspection of each burner must be conducted at least once every 72 months.
 - h. If the boiler is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 days of startup.
- 5.2.11 The Permittee shall install and operate a thermocouple system on the Kiln Nos. 1 (KLN1) **and 2 (KLN2)** baghouse inlet, which would warn the operator of any by-pass situation (i.e., baghouse inlet temperature above 475°F) defined as an excursion in Condition 6.1.7c. viii. The thermocouple and alarm system shall be used to continuously monitor the baghouse inlet temperature except during periods of scheduled routine maintenance performed while the kiln is idle. "Idle" shall mean that the feed and discharge systems are shut down to prevent material from entering or exiting the kiln. The baghouse inlet temperature shall be continuously recorded each day that the kiln is operated and any time an excursion occurs as defined in Condition 6.1.7c. viii. The feed shall be turned off during any bypass situation until the problem is corrected and the thermocouple indicates the stack temperature has returned to normal (i.e., baghouse inlet temperature below 475°F). All bypass stack occurrences should be recorded in a permanent form suitable and available for inspection and/or submittal. The records should include the following:
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- a. time and date of by-pass

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- b. time and date the clay feed was turned off
- c. time required to process residual clay
- d. amount of time in by-pass mode (i.e., stack temperature was above 475°F)
- e. corrective action taken
- f. steps taken to prevent future occurrences
- g. time and date stack temperature were returned to normal
- h. time and date clay feed were turned on

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTSAmended Condition**6.1 General Record Keeping and Reporting Requirements**

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)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any 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. Each exceedance of visible emission limit of 10% opacity (three 6minute averages) for Kilns **KLN1 and KLN2** and Spray Dryers SD01 and SD02, as indicated by certified visible emissions observer measurements or COMS.
- ii. Firing of the Boilers **BLR1 and BLR2**, Spray Dryers SD01 and SD02 and Kilns **KLN1 and KLN2** with fuel(s) other than natural gas and propane.
- iii. Any monthly average of methanol emissions from any spray dryer that exceed the limit of 0.48 lbs per ton of kiln feed in Condition 3.3.11.
- iv. Any 12-month rolling total of methanol emissions from any spray dryer that exceeds the 10.04 tons limit in Condition 3.3.11.
- v. Any instance of firing any of the stationary emergency diesel generators subject to Condition 3.3.9 with diesel fuel that contains more than 0.0015% sulfur (15 ppm) by weight; contains either more than 35% by volume of aromatic content or has a cetane index of less than 40.
- vi. Any 12-month rolling total of HCl emissions from Kiln **KLN1** that exceeds the 5.69 tons limit in Condition 3.3.11.

- vii. Any 12-month rolling total of HF emissions from Kiln KLN1 that exceeds the 12.4 tons limit in Condition 3.3.11.
- 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 temperature at the inlet of any baghouse specified in Condition 5.2.2 that exceeds the filter bag design temperature or the equivalent filter bag design temperature, as recorded in accordance with Condition 5.2.2.
 - ii. For the sources specified in Condition 5.2.3, any two consecutive required daily determinations of visible emissions from the same source for which visible emissions are equal to or exceed the opacity action level.
 - iii. Any visible emissions or mechanical failure or malfunction discovered by the walk through described in Condition 5.2.5 that are not eliminated or corrected within 24 hours of first discovering the visible emissions or mechanical failure or malfunction.
 - iv. Each event that the quarterly 30-minute visible emissions inspection required by Condition 5.2.7 was not conducted.
 - v. Any instance of operating any of the stationary emergency diesel generators for more than 500 hours during any period of 12 rolling/consecutive months as limited by Condition 3.2.3.
 - vi. Any instance of the accumulated maintenance check and readiness testing time for any emergency stationary diesel generator exceeding 100 hours during any period of 12 rolling/consecutive months as limited by Condition 3.3.4.
 - vii. For Kilns KLN1 **and** KLN2, each occurrence when the kiln baghouse inlet temperature exceeds 475°F as detected by an alarm in accordance with Condition 5.2.11.

6.2 Specific Record Keeping and Reporting Requirements

Amended Condition

- 6.2.2 The Permittee shall maintain a record of all actions taken in accordance with Condition **3.2.2** to control fugitive dust from roads, storage piles, or any other source of fugitive dust. Such record shall include, but not being limited to, the following information if applicable:
[391-3-1-.02(6)(b)1]
- a. Inspection and maintenance activities taken;

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- b. Daily operating log of each of the dust/fugitive control systems;
 - c. The sources (e.g. sections of the roads) that were controlled;
 - d. Ambient conditions (dry, wet, precipitation, temperature, etc.).
- 6.2.3 To demonstrate compliance with the limitations specified in this permit, the Permittee shall maintain the following records on site:
[391-3-1-.02(6)(b)1]
- a. Daily and monthly feed input rates for Kilns **KLN1 and KLN2**.
 - b. Monthly usage rate of additive(s)/chemical(s) containing methanol and/or VOC compounds used for each of the process lines.
 - c. Such records shall also include MSDS/SDS, Product Data Certification Sheet or other manufacturer/supplier certified records indicating the methanol and/or VOC content(s) of the additive(s) or chemical(s) used.
 - d. Daily and monthly operating hours of each spray dryer and kilns.
 - e. Monthly fuel usage records for boilers, spray dryers and kilns.

Unless otherwise specified, all records required above shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

- 6.2.15 The Permittee shall retain monthly records of natural gas/LPG usage in Kilns **KLN1 and KLN2**, in each spray dryer, and **each** boiler.
[391-3-1-.02(6)(b)1]
- 6.2.16 The Permittee shall submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii) before the close of business on the 60th day following the completion of all applicable performance test for Boiler **BLR2** according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report shall include the following information and certification(s) of compliance, as applicable, and signed by a responsible official:
[40 CFR 63.7530(d), 63.7530(e), 63.7530(f) & 63.7545(e)]
- a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, and justification for the selection of fuel(s) burned during the compliance demonstration.
[63.7545(e)(1)]

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- b. A description of the deviation, the duration of the deviation, and the corrective action taken if there was a deviation from any emission limit, work practice standard, or operating limit, as applicable.
[63.7545(e)(7)]
 - c. The following certification(s) of compliance, as applicable, and signed by a responsible official:
[63.7545(e)(8)]
 - i. “This facility complies with the required initial tune-up according to the procedures in §63.7540(a)(10)(i) through (vi).”
 - ii. “This facility has had an energy assessment performed according to §63.7530(e).”
- 6.2.17 The Permittee shall submit biennial or 5-year compliance reports, as applicable, for Boilers **BLR1 and BLR2** in accordance with the following requirements:
[40 CFR 63.7550(b)(1) thru (4) & 63.7550(h)(3)]
- a. The first compliance report must cover the period beginning on the applicable compliance date that is specified for each boiler or process heater, and ending on December 31 within 2 or 5 years, as applicable, after the compliance date that is specified for the source.
[40 CFR 63.7550(b)(1) & Table 9 to 40 CFR Part 63, Subpart DDDDD]
 - b. The first compliance report must be postmarked or submitted no later than January 31.
 - c. Each subsequent biennial or 5-year compliance report must cover the applicable 2- or 5-year periods from January 1 to December 31.
 - d. Each subsequent compliance report must be postmarked or submitted no later than January 31 of the following year.
 - f. 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.
- 6.2.18 The Compliance reports required in Condition **6.2.17** shall contain the following information:
[40 CFR 63.7550(c)(5), 63.7550(d) & 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.
 - d. Date of report and beginning and ending dates of the reporting period.

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- c. The total operating time during the reporting period.
- d. The date of the most recent tune-up for each boiler. 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.
- e. If there are no deviations from the applicable requirements for work practice standards in Table 3 to 40 CFR Part 63, Subpart DDDDD, a statement that there were no deviations from the work practice standards during the reporting period. For each deviation from the applicable work practice standards during the reporting period:
 - i. A description of the deviation and which emission limit or operating limit from which the boiler deviated.
 - ii. Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.
 - iii. If the deviation occurred during an annual performance test, provide the date the annual performance test was completed.
- 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.