

PERMIT NO. 3086-055-0021-S-01-0

ISSUANCE DATE:



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

## Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

**Facility Name:** Foam Products Corporation  
**Facility Address:** 15276 US Highway 27  
Trion, Georgia 30747 Chattooga County  
**Mailing Address:** 15276 US Highway 27  
Trion, Georgia 30747  
**Facility AIRS Number:** 04-13-055-00021

is issued a Permit for the following:

**Construction and operation of a facility for the manufacture of irradiated cross-linked polyethylene foam underlayment. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.**

This Permit 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 Permit.

This Permit 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 Application No. **29031** dated **September 19, 2023 (updated October 26, 2023 and November 17, 2023)**; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **4** pages.



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Jeffrey W. Cown, Director  
Environmental Protection Division

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**Department of Natural Resources**  
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**1. General Requirements**

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

**2. Allowable Emissions**

- 2.1 The Permittee shall not use greater than 1,650,000 tons of resin (low density polyethylene (LDPE) and/or ethylene vinyl acetate (EVA) resins) in the kneader extruders during any consecutive twelve-month period for purposes of limiting facility-wide VOC emissions below 100 tons during any twelve consecutive twelve-month period.  
[Avoidance of 40 CFR 70]
- 2.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the facility, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.  
[391-3-1-.02(2)(b)1.]

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- 2.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.

[391-3-1-.02(2)(e)1.]

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

b.  $E = 55P^{0.11} - 40$ , for process input weight rate in excess of 30 tons per hour.

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

- 2.4 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in fuel-burning sources at the facility, unless otherwise specified by the Director.

[391-3-1-.02(2)(g)2.]

### **3. Fugitive Emissions**

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

### **4. Process & Control Equipment**

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.

### **5. Monitoring**

- 5.1 Any monitoring system or device installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

[391-3-1-.02(6)(b)1.]

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**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All 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.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

**7. Notification, Reporting and Record Keeping Requirements**

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:  
Mr. Sean Taylor  
Stationary Source Compliance Program  
4244 International Parkway, Suite 120  
Atlanta GA 30354
- 7.2 The Permittee shall maintain monthly usage records (on a mass basis) of resins (LDPE and EVA) used in the kneader extruder operations on a combined basis. The Permittee shall notify the Division in writing if the monthly mass of resins used equals or exceeds 137,500 tons 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 usage limit in Condition 2.1. These records shall be available for inspection or submittal to the Division upon request.

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- 7.3 The Permittee shall use the records required by Condition 7.2 to determine the consecutive twelve-month total mass of resins (LDPE and EVA) used in the kneader's extruders. The Permittee shall notify the Division in writing if the total mass of resins used equals or exceeds 1,650,000 tons during any twelve consecutive months. 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 future compliance with the resin usage limit in Condition 2.1.

**8. Special Conditions**

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."