

## AIR QUALITY PERMIT

**Permit No.**  
**2752-121-0840-E-01-0**

**Effective Date**

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: **Williams Printing Company**

Mailing Address: 3900 North Commerce Drive  
East Point, Georgia 30344

is issued a Permit for the following:

The construction and operation of heatset and coldset offset lithographic printing facility. The Permit is also issued to incorporate the provisions of 40 CFR 51.165 (Non-Attainment Area New Source Review).

Facility Location: 3900 North Commerce Drive  
East Point, Georgia 30344 (Fulton County)

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. 15473 dated July 7, 2004; 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 **12** pages, which pages are a part of this Permit.

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Director  
Environmental Protection Division

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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 to the EPA. The records shall be retained for at least five (5) years following the date of entry.  
[391-3-1-.02(6)(b)1(i)]
- 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 discharge, or cause the discharge, into the atmosphere, from this source, volatile organic compound (VOC) emissions in amount equal to or exceeding of 44.3 tons during any twelve consecutive months.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 2.2 The Permittee shall not discharge, or cause the discharge into the atmosphere, from this facility, emissions which exhibit 40% opacity, or greater.  
[391-3-1-.02(2)(b)]

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- 2.3 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the amount specified by the following equation:  
[391-3-1-.02(2)(e)]

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

Where,

**E** = emission rate in pounds per hour,

**P** = process input weight rate in tons per hour.

- 2.4 The Permittee shall use no ink, coating, varnish, fountain solution, blanket and roller wash, or cleaning solvent that does not meet the following VOC content or vapor pressure requirements:  
[40 CFR 51.165 and 391-3-1-.03(8)c, 391-3-1-.02(2)(w) subsumed, and 391-3-1-.02(2)(ddd) subsumed]

Heatset Presses (Emission Unit ID Nos. W1 and W2)

- |    |                             |   |
|----|-----------------------------|---|
| a. | Fountain Solution -         | VOC content no greater than 5 percent by volume;                    |
| b. | Blanket and Roller Washes - | Vapor pressure no greater than 10 mm Hg at 20 °C or 2.5 lb VOC/gal; |
| c. | Cleaning Solvents -         | Vapor pressure no greater than 25 mm Hg at 20 °C or 2.5 lb VOC/gal  |

Coldset Presses (Emission Unit ID Nos. SF1 through SF4)

- |    |                                 |   |
|----|---------------------------------|---|
| a. | Inks, Coatings, and Varnishes - | VOC content no greater than 2.5 lb VOC/gal as applied;              |
| b. | Fountain Solution -             | VOC content no greater than 5 percent by volume;                    |
| c. | Blanket and Roller Washes -     | Vapor pressure no greater than 10 mm Hg at 20 °C or 2.5 lb VOC/gal; |
| d. | Cleaning Solvents -             | Vapor pressure no greater than 25 mm Hg at 20 °C or 2.5 lb VOC/gal  |

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**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.
- 3.2 All VOC emissions from waste solvent or solvent washings originating from the heatset and coldset printing presses (Emission Unit ID Nos. W1, W2, and SF1 through SF4) shall be considered in the emission limitations of Condition No. 2.4 unless the solvent is directed into normally closed containers that prevent evaporation into the atmosphere.  
[391-3-1-.02(2)(a)10]
- 3.3 The Permittee shall not dispose of or transfer waste solvents or solvent washings to another container by such a method as to allow the excessive evaporation of the solvent(s) into the atmosphere.  
[391-3-1-.02(2)(a)10]
- 3.4 The Permittee shall store all the used VOC-laden cleaning materials, including shop towels and rags in covered containers within 15 minutes after use.  
[391-3-1-.02(2)(a)10]

**4. Process & Control Equipment**

- 4.1 The Permittee shall operate the regenerative thermal oxidizer (Air Pollution Control Device ID No. TO1) during all periods of operation of the heatset offset lithographic printing presses (Emission Unit ID Nos. W1 and W2). The thermal oxidizer, TO1, must operate at a temperature that is proven to have a destruction efficiency of 97.0 percent or greater for all non-methane VOC entering the oxidizer. The oxidizer shall be operated at no less than 1400 °F or the average temperature determined during the most recent Division approved test demonstrating compliance. The Permittee may operate the oxidizer at a lower combustion temperature than the current Division approved operating temperature provided that:  
[40 CFR 51.165 and 391-3-1-.03(8)c, 391-3-1-.02(2)(w) subsumed, 391-3-1-.02(2)(ddd) subsumed]
  - a. A destruction efficiency performance test is conducted that demonstrates a minimum destruction efficiency of 97.0 percent will be achieved at the lower combustion temperature.
  - b. Testing is conducted in accordance with the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants** at the proposed temperature to determine the efficiency. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.

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- 4.2 The Permittee shall, when the heatset offset lithographic printing presses are in operation, operate the dryers associated with the heatset presses (Emission Unit ID Nos. W1 and W2) at negative pressure relative to the surrounding press room such that 100 percent of the VOC emitted during the drying process is captured and routed to the regenerative thermal oxidizer (Air Pollution Control Device ID No. TO1).  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 4.3 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division and shall be maintained for a period of five (5) years from date of entry.

**5. Monitoring**

- 5.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[40 CFR 51.165 and 391-3-1-.02(6)(b)1]
- a. Combustion zone temperature of the regenerative thermal oxidizer (Air Pollution Control ID No. TO1) at a position prior to any substantial heat loss/exchange. This device shall have a required accuracy of  $\pm 2$  °F.
- 5.2 The Permittee shall install, calibrate, operate, and maintain a monitoring device, according to manufacturer's instructions, for the measurement of vacuum in the duct system used to route VOC emissions from the heatset offset lithographic printing press dryers to the regenerative thermal oxidizer. Data shall be recorded once per hour.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

**6. Performance Testing**

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.  
[391-3-1-.02(6)(b)1(i)]
- 6.2 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.  
[391-3-1-.02(3)(a)]

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- 6.3 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 2 and 4 are as follows:
- a. Method 1 or 1A for sample point locations,
  - b. Method 2, for determination of volumetric flow rate,
  - c. Method 3 for determination of stack gas molecular weight
  - d. Method 4 for determination of stack gas moisture,
  - e. Method 5 for determination of particulate matter emissions,
  - f. Method 9 and the procedures contained in Section 1.3 of the above referenced document for the determination of opacity;
  - g. Method 18 for determination of organic HAP emissions,
  - h. Method 24 for the determination of the volatile matter weight fraction, water content, density, volume solids, and weight solids of each ink, coating, varnish, adhesive, primer, solvent, and other materials used in the offset lithographic printing operations;
  - i. Method 25 for determination of total gaseous nonmethane organic emissions as carbon.

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)]

- 6.4 Within sixty (60) days after achieving the maximum production rate which the source will be operated, but no later than one hundred twenty (120) days after the initial startup of the regenerative thermal oxidizer (Air Pollution Control Device ID No. TO1), the Permittee shall conduct a volatile organic compound destruction efficiency performance test on the regenerative thermal oxidizer TO1 to determine compliance with Condition No. 4.1. The results of the performance test(s), including the operating temperature established during the test(s), shall be submitted to the Division within sixty (60) days of the completion of testing.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

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

7.1 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv) and 391-3-1-.03(10)(d)1(i)]

7.2 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with conditions 7.3 or 7.1. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i)]

7.3 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

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

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.

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- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

7.4 Where applicable, the Permittee shall keep the following records:  
[391-3-1-.03(10)(d)1(i)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

7.5 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.  
[391-3-1-.03(10)(d)1(i)]

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7.6 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition No. 7.3, the following excess emissions, exceedances, and excursions shall be reported:

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

a. Excess emissions: (means for the purpose of this Condition and Condition No. 7.3, any 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 No. 7.3.

b. Exceedances: (means for the purpose of this Condition and Condition No. 7.3, 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. Any twelve month rolling total of VOC emissions from the entire facility that equal or exceed 44.3 tons.

c. Excursions: (means for the purpose of this Condition and Condition No. 7.3, 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 month during which the organic HAP emissions from the entire facility equal or exceed 2.08 tons for any combination of HAP or 0.83 tons for any individual HAP.

ii. Any three hour average combustion zone temperature in the regenerative thermal oxidizer (Air Pollution Control Device ID No. TO1) that is 50°F below the temperature specified in Condition No. 4.1.

iii. Any measurement of the vacuum in the exhaust ducts recorded in accordance with Condition No. 5.2, which falls below 1.6 inches of water column or below the most recent Division approved vacuum pressure range.

7.7 The Permittee shall maintain copies of the material safety data sheet (MSDS), certified product data sheet (CPDS), or onsite formulation data for each material listed in Condition No. 2.4. The MSDS, CPDS, or onsite formulation data shall list the VOC content, or vapor pressure, if applicable, of each material. These records shall be kept on file for as long as each material is being used at the facility and be made available for inspection by or submittal to the Division.

[40 CFR 51.165 and 391-3-1-.03(8)c, 391-3-1-.02(2)(w) subsumed, 391-3-1-.02(2)(ddd) subsumed]

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- 7.8 The Permittee shall maintain monthly usage records of all VOC containing materials used at the entire facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the volatile content of waste materials from the VOC emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the VOC content of the containerized waste material, and documentation of the method for determining the VOC content of the waste material. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.9 The Permittee shall use the records required in Condition No. 7.8 to calculate combined total monthly VOC emissions from the entire facility. 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 No. 7.8. The Permittee shall notify the Division in writing if the combined total monthly VOC emissions from the entire facility exceed 3.69 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.10 The Permittee shall use the monthly VOC emission data required in Condition 7.9 to calculate the combined 12-month rolling total of VOC emissions from entire facility for each calendar month. The Permittee shall notify the Division in writing if the combined 12-month rolling total of VOC emissions from the entire facility equals or exceeds 44.3 tons. 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 No. 2.1.  
[40 CFR 51.165 and 391-3-1-.03(8)c]
- 7.11 The Permittee shall use the following equations when calculating the monthly VOC emissions from the entire facility in accordance with Condition No. 7.9. All calculations should be kept as part of the monthly record. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.  
[40 CFR 51.165 and 391-3-1-.03(8)c]

Heatset Presses

a.  $VOC_i$  (lbs) = Material use (lbs) \* (%weight VOC) \* (1 -  $R_{Hi}$ ) \* (1 -  $CE_i * DE$ ); or

b.  $VOC_i$  (lbs) = Material used (gal) \* (VOC Content lbs/gal) \* (1 -  $R_{Hi}$ ) \* (1 -  $CE_i * DE$ ); or

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Coldset Presses

c.  $VOC_i$  (lbs) = Material use (lbs) \* (% weight VOC) \* (1 -  $R_{Ci}$ )

d.  $VOC_i$  (lbs) = Material used (gal) \* (VOC Content lbs/gal) \* (1 -  $R_{Ci}$ )

Waste

e.  $VOC_w$  (lbs) = Waste Material (lbs) \* (% weight VOC); or

f.  $VOC_w$  (lbs) = Waste Material (gal) \* (VOC Content lbs/gal)

Emission Totals

g. Total VOC (lbs) =  $(\sum_{i=1}^n VOC_i - \sum_{w=1}^n VOC_w) +$  (Non-press related VOC emissions)

Where;

$R_{Hi}$  = Retention factor for heatset press process material (i)

$R_{Ci}$  = Retention factor for coldset press process material (i)

$CE_i$  = Capture efficiency of the heatset press drying unit for each process material (i)

DE = Destruction efficiency of the regenerative thermal oxidizer

If, for any reason, the 3-hour average combustion zone temperature of the thermal oxidizer (Air Pollution Control Device ID No. TO1) remains 50°F below the temperature specified in Condition No. 4.1, the Permittee shall use a destruction efficiency of zero (0) percent for that time period.

7.12 The Permittee shall maintain monthly usage records of all HAP containing materials used at the entire facility. These records shall include the total weight of each material used and the HAP content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the volatile content of waste materials from the HAP emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the HAP content of the containerized waste material, and documentation of the method for determining the HAP content of the waste material. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.

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

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7.13 The Permittee shall use the records required in Condition No. 7.12 to calculate individual and combined total monthly HAP emissions from the entire facility. 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 No. 7.12.

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

7.14 The Permittee shall use the following equations when calculating the monthly HAP emissions from the entire facility in accordance with Condition No. 7.13. All calculations should be kept as part of the monthly record. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.

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

Heatset Presses

a.  $HAP_i$  (lbs) = Material use (lbs) \* (%weight HAP) \* (1 -  $R_{Hi}$ ) \* (1 -  $CE_i * DE$ ); or

b.  $HAP_i$  (lbs) = Material used (gal) \* (HAP Content lbs/gal) \* (1 -  $R_{Hi}$ ) \* (1 -  $CE_i * DE$ ); or

Coldset Presses

c.  $HAP_i$  (lbs) = Material use (lbs) \* (%weight HAP) \* (1 -  $R_{Ci}$ )

d.  $HAP_i$  (lbs) = Material used (gal) \* (HAP Content lbs/gal) \* (1 -  $R_{Ci}$ )

Waste

e.  $HAP_w$  (lbs) = Waste Material (lbs) \* (%weight HAP); or

f.  $HAP_w$  (lbs) = Waste Material (gal) \* (HAP Content lbs/gal)

Emission Totals

g. Total VOC (lbs) =  $(\sum_{i=1}^n HAP_i - \sum_{w=1}^n HAP_w) +$  (Non-press related HAP emissions)

Where;

$R_{Hi}$  = Retention factor for heatset press process material (i)

$R_{Ci}$  = Retention factor for coldset press process material (i)

$CE_i$  = Capture efficiency of the heatset press drying unit for each process material (i)

DE = Destruction efficiency of the regenerative thermal oxidizer

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If, for any reason, the 3-hour average combustion zone temperature of the thermal oxidizer (Air Pollution Control Device ID No. TO1) remains 50°F below the temperature specified in Condition No. 4.1, the Permittee shall use a destruction efficiency of zero (0) percent for that time period.

**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, within 12 months of startup of the facility, submit a Title V Operating Permit Application.
- 8.3 Georgia Air Quality No. 2752-060-12167 and any associated amendments are hereby revoked in its entirety upon startup of the new facility.