

Part 70 Operating Permit

Permit Number: 2499-025-0005-V-04-0 **Effective Date:**

Facility Name: SEGA Biofuels, LLC

Facility Address: 15333 US Hwy. 82 East
Nahunta, GA, 31533, Brantley County

Mailing Address: 15333 US Hwy. 82 East
Nahunta, GA, 31533, Brantley County

Parent/Holding Company: Enova Energy Group, LLC

Facility AIRS Number: 04-13-025-00005

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 Part 70 Permit for:

The operation of wood pellet manufacturing facility. Operation of two wood dryers with a 30 MMBtu/hr and 40 MMBtu/hr furnace each.

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. Unless modified or revoked, this Permit expires five years after the effective date indicated above.

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, for any misrepresentation made in Initial Title V Application No. TV-22518 signed on March 31, 2014, SIP application No. 22643 signed on June 6, 2014, and SIP Application No. 22986 signed on November 18, 2014, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of 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 **43** pages.

Director
Environmental Protection Division

Table of Contents

PART 1.0	FACILITY DESCRIPTION	1
1.1	Site Determination	1
1.2	Previous and/or Other Names	1
1.3	Overall Facility Process Description.....	1
PART 2.0	REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY	5
2.1	Facility Wide Emission Caps and Operating Limits.....	5
2.2	Facility Wide Federal Rule Standards.....	5
2.3	Facility Wide SIP Rule Standards.....	5
2.4	Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit	5
PART 3.0	REQUIREMENTS FOR EMISSION UNITS	6
3.1	Emission Units	6
3.2	Equipment Emission Caps and Operating Limits	7
3.3	Equipment Federal Rule Standards	7
3.4	Equipment SIP Rule Standards	7
3.5	Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit	9
PART 4.0	REQUIREMENTS FOR TESTING.....	10
4.1	General Testing Requirements	10
4.2	Specific Testing Requirements	11
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection)	14
5.1	General Monitoring Requirements.....	14
5.2	Specific Monitoring Requirements	14
PART 6.0	RECORD KEEPING AND REPORTING REQUIREMENTS	17
6.1	General Record Keeping and Reporting Requirements	17
6.2	Specific Record Keeping and Reporting Requirements.....	19
PART 7.0	OTHER SPECIFIC REQUIREMENTS.....	24
7.1	Operational Flexibility	24
7.2	Off-Permit Changes	24
7.3	Alternative Requirements.....	25
7.4	Insignificant Activities	25
7.5	Temporary Sources	25
7.6	Short-term Activities	25
7.7	Compliance Schedule/Progress Reports	25
7.8	Emissions Trading.....	25
7.9	Acid Rain Requirements	25
7.10	Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA).....	25
7.11	Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)	27
7.12	Revocation of Existing Permits and Amendments.....	28
7.13	Pollution Prevention.....	28
7.14	Specific Conditions	28
PART 8.0	GENERAL PROVISIONS	29
8.1	Terms and References	29
8.2	EPA Authorities	29
8.3	Duty to Comply.....	29
8.4	Fee Assessment and Payment	30

Title V Permit

SEGA Biofuels, LLC

Permit No.: 2499-025-0005-V-04-0

8.5	Permit Renewal and Expiration	30
8.6	Transfer of Ownership or Operation	30
8.7	Property Rights.....	30
8.8	Submissions.....	31
8.9	Duty to Provide Information	31
8.10	Modifications	32
8.11	Permit Revision, Revocation, Reopening and Termination.....	32
8.12	Severability	33
8.13	Excess Emissions Due to an Emergency	33
8.14	Compliance Requirements	34
8.15	Circumvention.....	36
8.16	Permit Shield.....	36
8.17	Operational Practices	37
8.18	Visible Emissions.....	37
8.19	Fuel-burning Equipment	37
8.20	Sulfur Dioxide.....	38
8.21	Particulate Emissions	38
8.22	Fugitive Dust.....	38
8.23	Solvent Metal Cleaning.....	39
8.24	Incinerators.....	40
8.25	Volatile Organic Liquid Handling and Storage	40
8.26	Use of Any Credible Evidence or Information	40
8.27	Internal Combustion Engines.....	41
8.28	Boilers and Process Heaters	41
Attachments		43
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		

PART 1.0 FACILITY DESCRIPTION

1.1 Site Determination

SEGA Biofuels, LLC (SEGA) owns and Enova Energy Group, LLC (Enova) operates a wood pellet manufacturing facility in Nahunta, Brantley County, Georgia (Nahunta facility). The operations are categorized under Standard Industrial Classification (SIC) code 2499, *Wood Products – Not Elsewhere Classified*. The Nahunta facility processes wood chips into fuel pellet to produce a source of alternative renewable fuel.

The Nahunta facility is a major source with respect to the Title V permitting program as potential emissions of particulate matter (PM), particulate matter less than 10 microns in diameter (PM₁₀), particulate matter less than 2.5 microns in diameter (PM_{2.5}), and volatile organic compounds (VOC) exceed the applicable major source threshold of 100 tons per year (tpy) each. The facility's emissions of hazardous air pollutants (HAP) are limited by Condition 2.1.3 of the current Air Quality Permit to less than 10 tpy of each individual HAP, and less than 25 tpy of total HAP, making the facility an area source of HAP.

1.2 Previous and/or Other Names

The facility has no previous names.

1.3 Overall Facility Process Description

The Nahunta facility operations include separate green and dry wood receiving areas and storage piles, a green hammermill, a dry hammermill, a wood chips dryer with associated dry wood-fired burner, a refining hog, four (4) pellet mills, a pellet cooler, pellet silos, and pellet loadout. A process flow diagram was included with the application in Appendix A. The dryer has a production capacity of 14 oven dried tons per hour (ODT/hr). Each of the four pellet mills, which receive both dried wood from the dryer and dry wood chips trucked to the facility from outside sources, has a production capacity of 5 ODT/hr. Thus, the Nahunta facility has a facility-wide pellet production capacity of 20 ODT/hr, or 175,200 ODT/yr based on maximum operation of 8,760 hours per year.

SEGA is proposing to implement an expansion project at the Nahunta facility to increase efficiency and facility-wide production. The project includes:

- Adding an additional receiving and processing area for wood fuel
- A second wood chips dryer with associated green wood-fired burner
- A second refining hog
- Replacing the green wood-fired burner on the existing dryer
- Adding two (2) new pellet mills
- Adding new material handling equipment
- Routing exhaust from the dryers, pellet mills, and pellet cooler to the dryer burners for incineration.
- A new green raw material hammermill

After completion of the proposed project, the existing dryer will have a production capacity of 8.82 ODT/hr), and the new dryer will have a production capacity of 11.85 ODT/hr, resulting in a facility-wide

production capacity of 20.67 ODT/hr. The Nahunta facility is being permitted to operate at maximum capacity for 8,760 hrs/yr and will have an annual production capacity of 181,055 ODT/yr. While the facility will still maintain the capacity to use dry wood chips in the pelletizing process after the dryers, the main source of raw materials will be green wood chips. Thus, the facility-wide production capacity is based on the capacity of the dryers.

SEGA submitted State Implementation Plan (SIP) Permit Amendment Application No. 22643 dated June 6, 2014 for the proposed project. This Permit Amendment No. 2411-025-0005-E-03-2 was issued on October 17, 2014. On December 2nd, 2014, the Division received SIP Permit Application No. 22986 dated November 18, 2014 to reclassify the Fine Return Cyclone (CY05) as its own emission source (standard gravity cyclone for refining hog), instead of a control device (pulling air from various sources with an ID fan).

Wood Receiving and Processing

Bark, and green and dry wood chips, and dry wood material to be used as fuel are trucked to the Nahunta facility on paved roadways to the wood receiving areas. Additionally, collected fines from the refining hogs, pellet cooler, and pellet silos will be collected in the fines return cyclone and sent to the bark infeed to be used as fuel. The facility has separate receiving areas for green and dry wood. The trucks are weighed upon arrival at the facility. The trucks are unloaded via the truck dump system into green wood or dry wood live bottom feed bins. The live bottom feed bins deposit the wood chips into the green feed or dry feed screw conveyors that transfer materials to the feedstock conveyance system. Wood chips and sawdust are gravity fed into the outdoor on-site wood storage piles. There are separate receiving areas, feed bins, screw conveyors, and storage piles for green and dry wood chips. The moisture content of the green wood chips and sawdust received is approximately 45-50%.

In the green wood handling area, material is transferred to the green raw material hammermill and then fed to a metering bin. The hammermill enhances the in-feed quality of the wood chips prior to the drying process. Emissions from the green hammermill are currently uncontrolled. In the dry wood handling area, dry wood chips are fed directly from the dry wood storage pile to the dry hammermill. The materials then bypass the drying process and are fed directly into the pellet mills. Particulate matter (PM) emissions from the dry raw material hammermill are currently controlled by a cyclone (CY04).

As part of the expansion project, the Nahunta facility will be adding a wood fuel receiving and processing line to prepare fuel for the two wood-fired dryer burners. The fuel preparation section will include a bark infeed and a new bark hog. There will be no modifications to the existing receiving and processing operations for green and dry raw material wood chips with the exception of the addition of a second green material hammermill.

The fines return cyclone is currently used at the Nahunta facility as the refining hog cyclone (CY05). The cyclone will be modified and moved to a new location at the facility as part of the expansion. There will be no modifications to the existing dry hammermill cyclone (CY04).

Wood Chips Drying

Processed green wood chips are currently conveyed to a triple pass dryer, which processes the wood chips to approximately 10-12% moisture content in preparation for the pelletizing operation. The wood chips and sawdust are mixed with hot gases from the heat source in the dryer. The dryer is designed to ensure

good mixing of wood chips with hot gases and sufficient retention time. The dryer currently has a maximum production capacity of 14 ODT/hr, or 122,640 ODT/yr based on maximum annual operations of 8,760 hr/yr.

The reduction in moisture content from 45% to approximately 10% in the dryer results in the hot gas temperature decreasing at the dryer outlet. The moisture rich gases mixed with dried wood chips is transferred to the dryer cyclones to separate wood chips from the gas. The hot chips are fed to conveyors for transport to the pelletizing process. The gases continue to the two cyclones in parallel (CY02 and CY03) to remove PM.

Heat for the chip dryer is currently provided by one (1) 35 million British Thermal Units per hour (MMBtu/hr) suspension type direct-fired burner. The burner is supplied with dried wood chips from the dryer out-feed, at a maximum combustion rate of 2.35 tph of wood chips. In the burner, a propane burner thermostat is also used during start-up to maintain refractory at a constant temperature.

After the proposed project is completed, the facility will operate one existing triple pass wood chip dryer and one new single pass wood chip dryer. The existing dryer (Dryer No. 1) will have a maximum production capacity of 8.82 ODT/hr, and the existing dryer burner will be replaced with a new 30 MMBtu/hr green wood-fired burner. The existing dryer will also be modified such that 50% of the exhaust from the dryer will be routed back to the dryer burner for incineration of volatile organic compounds (VOC) and organic HAP. The remaining portion of the exhaust will be routed to the existing cyclones in parallel (CY02 and CY03) for control of PM emissions. The total air balance will be controlled using a manual damper.

The new dryer (Dryer No. 2) will have a maximum production capacity of 11.85 ODT/hr, and heat for the unit will be provided by a 40 MMBtu/hr green wood-fired burner. As with the modifications to the existing dryer, the new dryer will also be constructed such that 50% of the exhaust is routed back to the dryer burner for incineration of VOC and organic HAP, and the remaining portion of the exhaust will be vented to two cyclones in parallel (CY06 and CY07) to remove PM. The total air balance for Dryer No. 2 will also be controlled using a manual damper.

Pelletizing Operations

Wood chips from the dryer are transported via conveyor to the hammermill unit. The hammermill grinds the dried wood chips to a uniform feed size for the pelletizing process. The particulate emissions from the hammermill are controlled by a cyclone (CY05).

The pelletizing process includes a die that physically presses the pellets using the dried wood chips. The pressing is completed by three rollers on the inside of the die that feed the ground material into the holes of the die creating a high pressure. The resultant heat of friction activated the wood lignin as the wood is compressed, effectively bonding the wood fiber into a durable pellet. No steam, adhesives, or bonding agents are used in the process of forming the wood pellets. The Nahunta facility utilizes four (4) pellet mills for producing the wood pellets.

Pellets exiting the pelletizer mill are conveyed to the counter-flow pellet cooler. Pellet cooling is necessary to ensure good pellet structural stability. The pellet coolers use counter-flow outside air, drawn into the pellet discharge bottom of the cooler, to rapidly cool the pellets.

Exhaust from the pellet cooler vents to a cyclone (CY01) to control particulate emissions. Entrained dust consists of coarser wood dust with moderate loadings due to the slow mechanical handling and transport of the finished pellets. The pellets are not subjected to aggressive tumbling or pneumatic transport that could result in dust generation.

During the expansion project, the Nahunta facility will be adding a second refining hog, and it will modify and repurpose the existing refining hog cyclone (CY05) to become the fines return cyclone. The facility will replace the existing hammermill baghouse (BH01) with two new baghouses (BH03 and BH04) that will be used to control PM emissions from the two refining hogs. Dry wood fines collected in these baghouses will be sent to the fines return cyclone to be used as fuel in the wood dryer burners.

The design of the Fine Return Cyclone (CY05) was changed such that CY05 will no longer be listed as a control device (pulling air from various sources with an ID fan) but rather as its own emission source (a standard gravity cyclone for the refining hog). SEGA has requested to add CY05 in the list in Condition 3.4.1 of the initial Title V Permit No. 2411-025-0005-V-04-0, and to remove references to CY05 in Conditions 5.2.1, 5.2.2, 5.2.5, and 4.2.5. Revised facility-wide emissions calculations were submitted to account for the new CY05 design (without the fan).

Additionally, the facility will add two (2) new pellet mills, resulting in six (6) total pellet mills. There will be no modifications to the existing pellet cooler or the existing pellet cooler cyclone (CY01). After the project, the facility will route all of the steam extraction from the pellet mills and 97.6% of the exhaust from the pellet cooler to the dryer burners for incineration of VOC and organic HAP content in the exhaust streams. As with the wood dryers, the total air balance for the pellet cooler will be controlled using a manual damper.

Pellet Storage and Loadout

Pellets produced are transferred via bucket elevator into three (3) storage silos. The pellets feed via gravity out of the storage silos onto a conveyance system. After the pellets pass through the vibrating screen, the pellets gravity feed into open top trucks for transfer off-site. Displaced air and exhaust from the pellet silos, vibrating screen, and truck loadout is controlled by a baghouse (BH02). Fines collected from the baghouse BH02, the pellet cooler, the pellet cooler shaker screen, and plant-wide operations are currently gathered in the hammermill baghouse (BH01), which are fed to the dry fuel surge bin for the heat source (dryer burner).

As part of the expansion project, the hammermill baghouse (BH01) is being replaced with two new baghouses (BH03 and BH04), that will be used to control PM emissions from the two refining hogs. The existing refining hog cyclone (CY05) will be modified and repurposed as the fines return cyclone, which will serve as the new gathering location for fines collected in the refining hogs baghouses (BH03 and BH04), the pellet cooler cyclone (CY01), and the pellet silos baghouse (BH02).

Emergency Fire Water Pump

The facility currently operates an electric fire water pump that does not have an internal combustion engine. As part of the expansion project, the facility is proposing to install a new diesel-powered emergency fire water pump with a maximum power output of 86 brake horsepower (bhp).

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

- 2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain volatile organic compounds (VOC) in excess of 249 tons during any twelve consecutive month period.
[Avoidance of 40 CFR 52.21]
- 2.1.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain carbon monoxide (CO) emissions in an amount equal to or exceeding 249 tons during any consecutive twelve-month period.
[Avoidance of 40 CFR 52.21]
- 2.1.3 The Permittee shall not discharge, or cause the discharge into the atmosphere from the entire facility, any single hazardous air pollutant (HAP) in an amount equal to or exceeding 10 tons during any twelve consecutive month period, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive month period.
[Avoidance of 40 CFR 63, 40 CFR 63 Area Source Classification, and 40 CFR 70 Avoidance]

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

Title V Permit

SEGA Biofuels, LLC

Permit No.: 2499-025-0005-V-04-0

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 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CY05	Fines Return Cyclone	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 3.4.5, 4.2.5, 5.2.1, 5.2.2, 5.2.5	None	None
FP01	Emergency Fire Water Pump	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.1, 3.3.2, 4.2.9	None	None
HM02	Dry Hammermill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 3.4.5, 4.2.2, 4.2.3, 4.2.6, 5.2.2, 5.2.3, 5.2.5, 6.2.2	CY04	Cyclone
PC01	Pellet Cooler	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.8, 5.2.6, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.12	CY01	Cyclone, 97.6% of the exhaust is rerouted to the HS01/HS02 for incineration and VOC control and organic HAP control..
PM01	Pellet Mill No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control
PM02	Pellet Mill No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control
PM03	Pellet Mill No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control
PM04	Pellet Mill No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control
PM05	Pellet Mill No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control
PM06	Pellet Mill No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.2, 3.4.4, 3.4.5, 3.5.5, 4.2.2	None	100% of the steam extraction is rerouted to the HS01/HS02 for incineration and VOC control and Organic control

Title V Permit

SEGA Biofuels, LLC

Permit No.: 2499-025-0005-V-04-0

PS01	Pellet Silos, Loadout (Two pellet storage silos, screening, truck loadout)	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 3.4.5, 4.2.2, 4.2.3, 4.2.6, 5.2.2, 5.2.3, 5.2.5, 6.2.2, 6.2.12	BH02	Baghouse
RH01	Refining Hog No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 4.2.3, 5.2.2, 5.2.3, 5.2.5, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.12	BH03	Baghouse
RH02	Refining Hog No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.4, 3.4.5, 4.2.3, 5.2.2, 5.2.3, 5.2.5, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.12	BH04	Baghouse
WD01 /HS01	Wood Dryer/Heat Source – Westec Triple-Pass Rotary Dryer with 14 oven-dried ton/hr capacity (30 MMBtu/hr Solgen Suspension Direct-Fired Wood Burner)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)(2) 391-3-1-.02(2)(n)	3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.10, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.12, 6.2.13, 6.2.14	CY02, CY03	Cyclones, 50% of the exhaust is rerouted to the HS01 for incineration and VOC and organic HAP control.
WD02 /HS02	Wood Dryer/Heat Source (40 MMBtu/hr Solgen Suspension Direct-Fired Wood Burner)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)(2) 391-3-1-.02(2)(n)	3.4.1, 3.4.3, 3.4.4, 3.4.5, 3.5.1, 3.5.2, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.10, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.8, 6.2.12, 6.2.13, 6.2.14	CY06, CY07	Cyclones, 50% of the exhaust is rerouted to the HS02 for incineration and VOC control and organic HAP control.

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The facility shall not produce wood pellets-in excess of 181,000 tons per twelve consecutive months.
[PSD Avoidance]

3.3 Equipment Federal Rule Standards

None applicable.

3.4 Equipment SIP Rule Standards

- 3.4.1 The Permittee shall not cause, let, permit, suffer, or allow the rate of emissions of particulate matter (PM) from any process stack including the Pellet Cooler (PC01), the Wood Dryer/Heat Sources (WD01/HS01 and WD02/HS02), the Hammermill (HM02), the Refining Hogs (RH01 and RH02), the Pellet Mills (PM01 thru PM06), the Pellet Silos (PS01), the Vibrating Screen (PS02), the Truck Loadout (PS03), and the Fines Return Cyclone (CY05) in total quantities equal to or exceeding the allowable rate calculated as follows:

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

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour, or} \\ E = 55P^{0.11}-40, \text{ for process input weight above 30 tons per hour}$$

Where:

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

- 3.4.2 The Permittee shall not cause, let, suffer, permit or allow emissions from any process stack, including the sources specified in Condition 3.4.1, the opacity of which is equal to or greater than forty (40) percent.

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

- 3.4.3 The Permittee shall not combust any fuel with a sulfur content exceeding 2.5 weight percent, in any combustion equipment including Heat Sources (HS01 and HS02).

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

- 3.4.4 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

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

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and

- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

3.4.5 The Permittee shall comply with Georgia Air Quality Control Rules 391-3-1-.02(2)(n), “Fugitive Dust”, for the entire processing facility including all roadways and processing equipment not otherwise subject to any other rule or regulation governing fugitive visible emissions. Subject to this rule, the Permittee shall not cause, let, permit, suffer or allow visible emissions from any fugitive source to equal or exceed 20 percent opacity.
[391-3-1-.02(2)(n)2]

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

3.5.1 At all times during operations, the Pellet Cooler (PC01), the Pellet Mills (PM01 through PM06), and the exhausts from the Wood Dryer/Heat Sources (WD01/HS01 and WD02/HS02) shall be vented to the Heat Sources (i.e. wood burners) (HS01/HS02).
[PSD Avoidance]

3.5.2 At all times during operation, at least 50% of the Dryers (WD01/WD02) exhausts and 97% of the Pellet Cooler (PC01) exhaust shall be recycled to the Heat Sources (i.e. wood burners) (HS01/HS02).
[PSD Avoidance]

3.5.3 The Permittee shall operate all air pollution control devices whenever the associated equipment is being operated.
[PSD Avoidance]

3.5.4 The Permittee shall not adjust the damper positions that were established during any initial testing as required by Condition 4.2.3.
[PSD Avoidance]

3.5.5 The Permittee shall not operate the Pellet Mills (PM01 through PM06), and the Pellet Cooler (PC01), if the wood burners (HS01/HS02) are not operating.
[PSD Avoidance]

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements**

- 4.1.1 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)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) 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) and 40 CFR 63.7(b)(1)]
- 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 are as follows:
- a. Method 1 for the determination of sample point locations.
 - b. Method 2 for the determination of stack gas flow rate.
 - c. Method 3 or 3A for the determination of stack gas molecular weight.
 - d. Method 3B for the determination of the emission rate correction factor or excess air; Method 3A may be used as an alternate.
 - e. Method 4 for the determination of stack gas moisture.
 - f. Method 5 and Method 202 for the determination of Particulate Matter emissions.
 - g. Method 6 or 6C for the determination of Sulfur Dioxide emissions.
 - h. Method 7 or 7E for the determination of Nitrogen Oxides emissions for RATAs. CERMS used to determine compliance with the NO_x limit.
 - i. Method 9 shall be used for the determination of Opacity. Data from the COMS required by Condition 5.2.1 may be used in lieu of Method 9 if the performance evaluation of the COMS has been completed and the results approved by the Division.
 - j. Method 10 for the determination of Carbon Monoxide emissions for RATAs. CERMS used to determine compliance with the CO limit.

- k. Method 19 when applicable, to convert particulate matter, carbon monoxide, sulfur dioxide, and nitrogen oxides concentrations (i.e. grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to emission **rates** (i.e. lb/MMBtu).

- l. OTM 26 for determining VOC emissions.

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)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.
[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

- 4.2.1 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.
- 4.2.2 Within 120 days after startup of the Wood Dryer No. 1 (HS01 and WD01), and Wood Dryer No. 2 (HS02 and WD02), the Permittee shall conduct initial performance tests for PM, NO_x and CO from the Dryer exhausts to establish emission factors (lb/ODT (short tons)) for PM, NO_x and CO to be used in Condition 6.2.4. During the performance testing, the Permittee shall continuously record the amount of product dried in the Dryers, the process rate of the Hammermills (HM02) and Pellet Mills (PS01) separately. NO_x and CO performance testing shall be conducted simultaneously with the equipment operating under normal conditions. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.

From data collected during the initial performance test, the Permittee shall establish the range for the oxygen (O₂) levels and the operating range temperature for the Dryer, which indicates that CO and NO_x emissions are being minimized and also establishes pressure ranges for recycled air streams. The data, the range determined, and the method used to determine the range shall be submitted to the Division within 60 days following the initial performance testing. NO_x and CO tests shall be conducted simultaneously.

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

- 4.2.3 Within 120 days after startup of Wood Dryer No. 1 (HS01 and WD01), and Wood Dryer No. 2 (HS02 and WD02), the Permittee shall conduct an initial performance test for volatile organic compounds (VOC), formaldehyde, acetaldehyde, and methanol from the Dryer Cyclone exhausts (CY02, CY03, CY06, CY07), Refining Hog Baghouse exhausts (BH03, BH04) and Pellet Silos Baghouse exhaust (BH02). VOC emissions shall be determined using Method 25A. Acetaldehyde, and Formaldehyde emissions shall be determined using NCASI 99.02, or Method 316, or NCASI 98.01. Methanol emissions shall be determined using NCASI 99.02, or Method 308. The results of the performance testing shall be submitted to the Division within 60 days of the completion of testing.

From *the* results of the performance tests, the Permittee shall establish a lb/ODT emission factor for each pollutant to be used in Condition 6.2.5. Performance testing shall be conducted with the equipment operating under normal conditions. During the performance testing, the Permittee shall record the amount of product dried in the Dryer, the process rate of the Refining Hogs (RH01 and RH02) and Pellet Mills (PS01) separately.

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

- 4.2.4 Following the initial performance tests required by Condition 4.2.2, the Permittee shall conduct tests for NO_x and CO from the Wood Dryer No. 1 (HS01 and WD01), and Wood Dryer No. 2 (HS02 and WD02) exhaust, at 24-month intervals. If the results of the test exceed the factor currently being used in Condition 6.2.4, then the Permittee must immediately reestablish the factors using the method described in Condition 6.2.6 (using the new, higher emission factors starting on the test date).

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

- 4.2.5 The Permittee shall monitor the pressure drop across the Wood Dryer No. 1 Cyclones (CY02 and CY03), the Dry Hammermill Cyclone (CY04), and the Wood Dryer No. 2 Cyclones (CY06 and CY07) within 180 days after startup for the modifications authorized, recording the cyclone pressure drops at least once per 15 minutes for a period of three hours. The pressure drop range for the Wood Dryer No. 1 Cyclones (CY02 and CY03) shall be determined during the filterable performance testing required by Condition 6.1 for the stack of Wood Dryer No. 1 (HS01 and WD01), and the pressure drop range for the Wood Dryer No. 2 Cyclones (CY06 and CY07) shall be determined during the filterable performance testing required by Condition 6.1 for the stack of Wood Dryer No. 2 (HS02 and WD02). The Permittee shall determine the arithmetic average of the pressure drop data for the Wood Dryer No. 1 Cyclones (CY02 and CY03), the Dry Hammermill Cyclone (CY04), and the Wood Dryer No. 2 Cyclones (CY06 and CY07), and submit to the Division a report containing the pressure drop data, and the arithmetic averages. The Permittee shall use the monitored pressure drop data to establish pressure ranges for efficient operation of the Cyclones. The report shall be submitted to the Division for approval within 60 days after the completion of pressure drop monitoring.

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

- 4.2.6 Following the initial performance tests required by Condition 4.2.3, the Permittee shall conduct VOC, formaldehyde, acetaldehyde, and methanol tests on the exhausts from the stacks of Wood Dryer No. 1 Cyclones (CY02 and CY03), Wood Dryer No. 2 Cyclones (CY06 and CY07), Refining Hog Baghouses (BH03 and BH04), and Pellet Storage Silo Baghouse (BH02) at 48-month intervals.
[391-3-1-.02(6)(b)1(i)]
- 4.2.7 During the initial VOC, formaldehyde, acetaldehyde, and methanol performance testing required by Condition 4.2.3, the Permittee shall continuously measure and record the temperatures for the Dryers (WD01 and WD02). These measurements shall be used to establish the temperature range at which the Dryers (WD01 and WD02) must operate to ensure compliance with the VOC emission limit of Condition 2.1.1. The Permittee shall submit the temperature measurements recorded during the testing and the minimum temperatures established to the Division for approval within 60 days of the completion of testing.
[391-3-1-.02(6)(b)1(i)]
- 4.2.8 During the initial testing required by Conditions 4.2.2 and 4.2.3, the Permittee shall measure and establish a pressure range for the monitors as required by Condition 5.2.6. The Permittee shall also mark the damper positions that were used to establish the recycle rates from the Dryers (WD01 and WD02), the Pellet Mills (PM01 through PM06), and the Pellet Cooler (PC01).
[391-3-1-.02(6)(b)1]
- 4.2.9 Each of the engines at the facility shall be operated and maintained according to the manufacturer's written specifications/instructions or procedures developed by the Permittee that are approved by the engine manufacturer, over the entire life of the engine.
[40 CFR 60.4211(a)]
- 4.2.10 The Permittee shall acquire and record all (choose one or both) VOC and CO emissions data measured prior to, during, and/or after performance and compliance source testing of Wood Dryer No. 1 (HS01 and WD01), and Wood Dryer No. 2 (HS02 and WD02),. The purpose of this Condition is to demonstrate operating conditions prior to, during and after adjustments of operating parameters and applies to any engineering testing, burner tuning, or other pre/post-test sampling conducted for the source test required by Conditions 4.1.1, 4.2.2, 4.2.3, 4.2.4 or 4.2.6. The data collected shall be included as a separate item in the emissions test report and shall as a minimum be in five minute averages. All parametric data required by Conditions 4.2.7 and 4.2.8 to be monitored during performance or compliance testing shall also be recorded and reported. In addition to parameters required by Conditions 4.2.7 and 4.2.8 any parameters routinely monitored by the Permittee to ensure good combustion shall also be recorded. The period covered by this Condition shall begin two operating days prior to, and continuing until two operating days following any performance or compliance test.
[391-3-1-.02(6)(b)1]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. 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]

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall perform the following applicable operation and maintenance checks on the the Wood Dryer No. 1 Cyclones (CY02 and CY03), the Pellet Cooler Cyclone (CY01), the Dry Hammermill Cyclone (CY04), and Wood Dryer No. 2 Cyclones (**CY06 and CY07**), and retain a record suitable for inspection or submittal for each week or portion of each week of operation. A checklist or other similar log may be used for this purpose:
[391-3-1-.02(6)(b)1]
- a. Check exterior of the units for holes in the body or evidence of malfunction in interior of the cyclones.
 - b. Check hopper for bridging and plugging.
 - c. Check particulate transfer device for proper operation to ensure dust removal. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken.
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate pressure drop indicators on the Wood Dryer No. 1 Cyclones (CY02 and CY03), the Dry Hammermill Cyclone (CY04), the Wood Dryer No. 2 Cyclones (CY06 and CY07), the Pellet Silo Baghouse (BH02), and the Refining Hog Baghouses (BH03 and BH04). The Permittee shall read, and record the pressure drop at least once per operating day. A logbook containing these records shall be available for inspection and/or submittal to the Division.
[391-3-1-.02(6)(b)1]
- 5.2.3 Within 180 days of the startup of the facility, the Permittee shall develop and implement a Preventive Maintenance Program for the baghouses (BH02, BH03, and BH04). All QA/QC practices and criteria shall be stated in the Preventative Maintenance Program. The program shall be subject to review and if necessary to assure compliance, modification by the Division. At a minimum, the following operation, and maintenance checks shall be made on at least a weekly basis, and a record of the findings, and corrective actions taken shall be kept in a maintenance log:
[391-3-1-.02(6)(b)1]

- a. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
- b. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.
- c. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; and proper lubrication.
- d. Check dust collector hoppers and conveying systems for proper operation.

- 5.2.4 The Permittee shall install, calibrate, maintain, and operate monitoring devices to continuously measure and record the temperature at the exit of the Heat Sources (HS01 and HS02). Data should be recorded continuously when the Heat Sources are operating. This data should be used to calculate hourly averages of temperatures in the Heat Sources.

The hourly averages shall be used to calculate the three-hour averages for each hour of operation. If the three-hour average falls below the minimum operating temperature established per Condition 4.2.7, the Permittee shall record this in a log, as an excursion, and take action to bring the temperature up to the minimum temperature. This action and the results shall be recorded in the log. This log shall be available for submission or inspection by Division personnel upon request.

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

- 5.2.5 Beginning within 180 days of the issuance of this permit, the Permittee shall perform checks of visible emissions of the exhaust from the Cyclones (CY01, CY02, CY03, CY04, CY06, CY07) and the Baghouses (BH02, BH03, BH04) while the equipment is operating at the normal expected operating rate. A check shall be conducted at least once each operating day, using the procedures below, except when atmospheric conditions or sun positioning prevent any opportunity to perform a VE check. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal.

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

- a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere from the wood flake drying drum and record the results in the daily VE log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b of this condition.
- b. For each check where a stack is determined to be emitting visible emissions, a qualified observer shall determine whether the emissions equal or exceed a 30% opacity action level, using the procedure specified in paragraph d of this condition. For the purposes of this condition a qualified observer is one that has had additional

training. Also, this determination shall cover a period of three minutes. The results shall be recorded in the daily VE log. For sources that exhibit visible emissions of greater than or equal to the opacity action level, the Permittee shall comply with paragraph c of this condition.

- c. For each occurrence that requires action in accordance with paragraph b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the raw material feed rate, and any other pertinent operating parameters as well as the corrective action taken, in the maintenance log.
- d. The person performing the determination shall stand at a distance of at least three stack heights, with a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

5.2.6 The Permittee shall install, calibrate, maintain, and operate a pressure monitoring device in the recycled air ducts for the Wood Dryer/Heat Sources (WD01/HS01 and WD02/HS02), the Pellet Mills (PM01 through PM06), and the Pellet Cooler (PC01). Data shall be recorded continuously when the Wood Dryer/Heat Sources (WD01/HS01 and WD02/HS02), and the Pellet Cooler (PC01) are operating.
[391-3-1-.02(6)(b)1]

5.2.7 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.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

5.2.8 The Permittee shall maintain a critical spare parts inventory for all control equipment. Critical spare parts include those which are most probable to fail under normal operating conditions of control equipment and which can be practically inventoried and installed by the Permittee. In particular, the Permittee shall maintain an inventory of filter bags such that an adequate supply of the bags is on hand to replace any defective bags in the baghouse.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

- 6.1.1 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) and 40 CFR 70.6(a)(3)]

- 6.1.2 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), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.3 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 6.1.4 or 6.1.2. 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 August 29 and February 28, respectively following each reporting period, 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) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.4 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 or semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. 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 and 40 CFR 70.6(a)(3)(iii)(A)]

- 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.
- 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.

6.1.5 Where applicable, the Permittee shall keep the following records:
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- 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.

6.1.6 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) and 40 CFR 70.6 (a)(3)(ii)(B)]

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)(iii)]

- 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)
 - i. 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. None required to be reported in accordance with Condition 6.1.4.
- 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 daily pressure drop readings, required by Condition 5.2.2, are outside of the range established per Condition 4.2.5, for two consecutive days.
 - ii. Any three-hour average in which the average temperature of the heat source (HS01), measured as required by Condition 5.2.4, is outside of the range established per that condition.
 - iii. Any instance in which the visible emission reading of sawdust-fired burner required by Condition 5.2.5 is above the action level of that condition for two consecutive days.
 - iv. Specific identification of each period of excursion described in paragraphs a. through c of this condition. Include the magnitude, nature, and cause of any malfunction (if known), as well as the corrective action taken or preventive measures adopted (if any).

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.1 The Permittee shall furnish the Division written notification of the startup of the proposed equipment at this site within 15 days after such date. For purposes of this Permit, "startup" shall mean the setting in operation of a source for any purpose.
[391-3-1-.02(6)(b)1]
- 6.2.2 Each month, beginning within 60 days after the testing required by Condition 4.2.3, the Permittee shall use the results of the testing required by Condition 4.2.3 to determine the monthly emissions of acetaldehyde, formaldehyde, methanol, and the total monthly emissions of combined HAP from the stacks of the Wood Dryer No. 1 (HS01 and WD01), the Wood Dryer No. 2 (HS02 and WD02), the Refining Hog Baghouses (BH03 and BH04), and the Pellet Storage Silo Baghouse (BH02). All calculations, including any Division-

approved emission factor, shall be kept as part of the record. The Permittee shall notify the Division in writing if emissions of any individual HAP exceed 0.83 tons from the Dryers, or if emissions of the combined HAPs exceed 2.08 tons from the Dryers, 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 2.1.3.

Within 15 days after the first determination of the monthly emissions of acetaldehyde, formaldehyde, methanol, and total HAPs, the Permittee shall submit this information to the Division, along with an explanation showing how the emissions were determined, and all calculations done.

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

- 6.2.3 The Permittee shall submit a written report containing any excursions as described in this Condition 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 excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall contain the following:

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

- a. Any instance in which daily pressure drop readings, required by Condition 5.2.2, are outside of the range established per Condition 4.2.5, for two consecutive days.
- b. Any three-hour average in which the average temperature of the heat sources (HS01 and HS02), measured as required by Condition 5.2.4, is outside of the range established per that condition.
- c. Any instance in which the visible emission reading of sawdust-fired burners required by Condition 5.2.5 is above the action level of that condition for two consecutive days.
- d. Specific identification of each period of excursion described in paragraphs a. through c of this condition. Include the magnitude, nature, and cause of any malfunction (if known), as well as the corrective action taken or preventive measures adopted (if any).

- 6.2.4 The Permittee shall calculate the monthly CO and PM/PM₁₀/PM_{2.5} emissions from the Wood Dryers (WD01/HS01 and WD02/HS02), Refining Hogs (RH01 and RH02), and Pellet Cooler (PC01), using the records from Condition 6.2.12, and the following equation:

[Avoidance of 40 CFR 52.21]

$$E = \left(\frac{\text{EmissionFactor} \text{ lb Pollutant}}{\text{ODT}} \right) (\text{MonthlyDryerProduct ODT}) \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

E = tons of CO, PM/PM₁₀ pollutant per month

ODT refers to Oven Dried Tons and refers to short tons.

The Permittee shall establish emission factors for PM/PM₁₀/PM_{2.5} using the results of the initial CO and PM/PM₁₀/PM_{2.5} testing required by Condition 4.2.2. The results shall be submitted to the Division, along with the test results per Condition 4.2.2.

The Permittee can later reestablish the PM/PM₁₀/PM_{2.5} factors if they wish. This may be using the results from the PM/PM₁₀/PM_{2.5} testing required by Condition 4.2.2 or any other testing, as long as it was done per the permit requirements. The results shall be submitted to the Division. Upon review and approval, the Permittee may then begin using the new factors to calculate PM/PM₁₀/PM_{2.5} emissions.

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

- 6.2.5 The Permittee shall calculate the monthly VOC, formaldehyde, acetaldehyde, and methanol emissions from the Wood Dryers (WD01/HS01 and WD02/HS02), the Refining Hogs (RH01 and RH02), and the Pellet Cooler (PC01) using the records from Condition 4.2.3 and the following equation(s). All emission factors and calculations shall be kept as part of the monthly records, available for inspection or submittal.

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

The Permittee shall calculate VOC emissions including formaldehyde, acetaldehyde, and methanol emissions using EPA OTM-26.

$$\text{VOC} = [\text{Method 25A VOC as propane} + \text{Methanol} + \text{Formaldehyde} + \text{Acetaldehyde}] - [(0.65)\text{Methanol}]$$

Where the final emission factors are the sum of all results from the Dryers (WD01/HS01 and WD02/HS02), the Refining Hogs (RH01 and RH02), and the Pellet Cooler (PC01) for each pollutant.

Then determine the tons of pollutant per month using the following equation.

$$E = \left(\frac{\text{EmissionFactor} \text{ lb Pollutant}}{\text{ODT}} \right) (\text{MonthlyDryerProduct} \text{ ODT}) \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

E = tons pollutant emitted per month

ODT refers to Oven Dried Tons and refers to short tons.

The Permittee shall establish emission factors for VOC, formaldehyde, acetaldehyde and methanol using the results of the initial emission testing required by Condition 4.2.3. The results shall be submitted to the Division, along with the test results per Condition 4.2.3.

The Permittee can later reestablish emissions factors if they wish. This may be done using the results from the testing required by Condition 4.2.7 or any other testing, as long as it was done per the permit requirements. The results shall be submitted to the Division per the reporting requirements of Condition 4.2.7.

Upon review and approval, the Permittee may then begin using the new factors to calculate HAP emissions.

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

The Permittee shall use the following equation to calculate monthly HAP emissions.

$$\text{Monthly HAPs} = (\text{Production in ODT}) (EF_F + EF_M + EF_A + EF_O)$$

Where:

EF_F = Emission Factor for Formaldehyde (lb/ODT)

EF_M = Emission Factor for Methanol (lb/ODT)

EF_A = Emission Factor for Acetaldehyde (lb/ODT)

EF_O = 0.0205 lb/ODT (Emission Factor for Others)

- 6.2.6 The Permittee shall use the monthly CO and PM/PM₁₀/PM_{2.5} emission data required in Condition 6.2.4 to calculate the 12-month rolling total of each pollutant emitted from the Dryers (WD01/HS01 and WD02/HS02), Refining Hogs (RH01 and RH02), and the Pellet Cooler (PC01) for each calendar month in the reporting period. These records shall be kept available for inspection or submittal.
[391-3-1-.03(2)(c)]
- 6.2.7 The Permittee shall notify the Division in writing if total CO or PM/PM₁₀/PM_{2.5} emissions exceed 20.75 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 emission limit in Condition 2.1.2.
[391-3-1-.03(2)(c)]
- 6.2.8 The Permittee shall use the monthly VOC, formaldehyde, acetaldehyde, methanol and total HAP emission data required in Condition 6.2.5 to calculate the 12-month rolling total of each pollutant emitted from the Dryers (WD01/HS01 and WD02/HS02), the Refining Hogs (RH01 and RH02), and the Pellet Cooler (PC01) for each calendar month in the reporting period. These records shall be kept available for inspection or submittal.
[391-3-1-.03(2)(c)]
- 6.2.9 The Permittee shall notify the Division in writing if the monthly emissions of VOC exceed 20.75 tons, or any single hazardous air pollutant equals or exceeds 0.83 tons, or if emissions of total HAPs exceed 2.08 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 emission limit in Conditions 2.1.1 and 2.1.3.
[391-3-1-.03(2)(c)]
- 6.2.10 The Permittee shall notify the Division in writing if the emissions of any single HAP equals or exceeds 10 tons, or if the emissions total HAPs equals or exceeds 25 during any consecutive twelve-month 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(s) in Condition 2.1.3.
[391-3-1-.03(2)(c)]

- 6.2.11 The Permittee shall notify the Division in writing if the rolling total CO, PM/PM₁₀/PM_{2.5} or VOC emissions equals or exceeds 249 tons during any consecutive twelve-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 compliance with the emission limit(s) in Conditions 2.1.1 and 2.1.2.
[391-3-1-.03(2)(c)]
- 6.2.12 The Permittee shall keep operating records to determine the total amount of wet wood chips processed in the Dryers (WD01/HS01 and WD02/HS02) in oven dried tons (ODT) (short tons), the total amount of dried wood chips processed in the Refining Hogs (RH01 and RH02), the total amount of dried wood chips processed in the Pellet Mills (PM01 thru PM06), and the amount of pellets processed in the Pellet Cooler (PC01), on a monthly basis. These records shall be suitable for inspection and/or submittal to the Division.
[Avoidance of 40 CFR 52.21]
- 6.2.13 Each month, beginning within 180 days after startup after the modification authorized by this permit, the Permittee shall use the results of the testing required by Condition 6.2.3 to determine the monthly emissions of formaldehyde and methanol and the total monthly emissions of combined HAP from the stack of the heat sources (HS01 and HS02) and the wood dryers (WD01 and WD02). All calculations, including any Division-approved emission factor, shall be kept as part of the record. The Permittee shall notify the Division in writing if emissions of any individual HAP exceed 0.83 tons from the dryer, or if emissions of the combined HAP exceed 2.08 tons from the dryer, 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 2.1.3.

Within 15 days after the first determination of the monthly emissions of formaldehyde, methanol, and total HAP, the Permittee shall submit this information to the Division, along with an explanation showing how the emissions were determined and all calculations done.
[391-3-1-.02(6)(b)1]
- 6.2.14 The Permittee shall submit a written report containing any excursions as described in Condition 6.1.4 for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29th and February 28th, respectively. In the event that there have not been any excursions or malfunctions during a reporting period, the report should so state.

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.1 Operational Flexibility**

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.
[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

7.2 Off-Permit Changes

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:
[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

- 7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act.
[Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

7.3 Alternative Requirements

[White Paper #2]

Not Applicable.

7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.5 Temporary Sources

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable.

7.6 Short-term Activities

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

Not Applicable.

7.7 Compliance Schedule/Progress Reports

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable.

7.8 Emissions Trading

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable.

7.9 Acid Rain Requirements

Not Applicable.

7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

- 7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.

- a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.

Title V Permit

- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
 - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.
 - ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
 - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
 - iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP*eSubmit (information for establishing an account can be found at www.epa.gov/emergencies/content/rmp/rmp_esubmit.htm). Electronic Signature Agreements should be mailed to:

MAIL

Risk Management Program (RMP) Reporting Center
P.O. Box 10162
Fairfax, VA 22038

COURIER & FEDEX

**Risk Management Program (RMP) Reporting Center
CGI Federal
12601 Fair Lakes Circle
Fairfax, VA 22033**

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.
[Note: “MVAC-like appliance” is defined in 40 CFR 82.152.]
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B

does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
2411-025-0005-E-03-0	January 9, 2012
2411-025-0005-E-03-1	February 17, 2014
2411-025-0005-E-03-2	October 17, 2014

7.13 Pollution Prevention

None applicable.

7.14 Specific Conditions

None applicable.

PART 8.0 GENERAL PROVISIONS**8.1 Terms and References**

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence.
[391-3-1-.02(2)(a)2]

8.2 EPA Authorities

- 8.2.1 Except as identified as “State-only enforceable” requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.
[40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, “Inspections, Monitoring, and Entry.”
[40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, “Emergency Powers.”
[40 CFR 70.6(f)(3)(i)]

8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

- 8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.
[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

8.4 Fee Assessment and Payment

- 8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the “Procedures for Calculating Air Permit Fees.”
[391-3-1-.03(9)]

8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the effective date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.
[391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.
[391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation.
[391-3-1-.03(10)(e)3(iii)]

8.6 Transfer of Ownership or Operation

- 8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.
[391-3-1-.03(4)]

8.7 Property Rights

- 8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

8.8 Submissions

- 8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

**Georgia Department of Natural Resources
Environmental Protection Division
Air Protection Branch
Atlanta Tradeport, Suite 120
4244 International Parkway
Atlanta, Georgia 30354-3908**

- 8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

**Air and EPCRA Enforcement Branch – U. S. EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104**

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]
- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.
[391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

8.10 Modifications

- 8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The 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. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.
[391-3-1-.03(1) through (8)]

8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:
[391-3-1-.03(10)(d)1(i)]
- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;
[391-3-1-.03(10)(e)6(i)(I)]
 - b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;
[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
 - c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or
[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
 - d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.
[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.
[391-3-1-.03(10)(e)6(ii)]

- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.
[391-3-1-.03(10)(e)6(iii)]

- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]

- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.

- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

8.12 Severability

- 8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

8.13 Excess Emissions Due to an Emergency

- 8.13.1 An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]

- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:
 - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. The Permitted facility was at the time of the emergency being properly operated;

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
- d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]

8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.

[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

8.14 Compliance Requirements

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;

- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
- e. Any additional requirements specified by the Division.

8.14.2 Inspection and Entry

- a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:
[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]
 - i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
 - iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.
[391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that:
[391-3-1-.02(2)(a)7(i)]
 - i. The best operational practices to minimize emissions are adhered to;
 - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
 - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.
[391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) – New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.
[391-3-1-.02(2)(a)7(iii)]

8.15 Circumvention

State Only Enforceable Condition.

- 8.15.1 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 which is based on the concentration of the pollutants in the gases discharged into the atmosphere.
[391-3-1-.03(2)(c)]

8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.
[391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as “State only enforceable” does not have a Permit shield.

8.17 Operational Practices

- 8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the 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 any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.
[391-3-1-.02(2)(a)10]

State Only Enforceable Condition.

- 8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.
[391-3-1-.02(2)(a)1]

8.18 Visible Emissions

- 8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1]

8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input.
[391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.
[391-3-1-.02(2)(d)]
- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible

emissions 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)]

8.20 Sulfur Dioxide

- 8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.
[391-3-1-.02(2)(g)]

8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, 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 allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.
[391-3-1-.02(2)(e)]

- a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour.}$$
$$E = 55P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour.}$$

- b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and
P = process input weight rate in tons per hour.

8.22 Fugitive Dust

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

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

8.23 Solvent Metal Cleaning

8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied:
[391-3-1-.02(2)(ff)1]

- a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
- b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
- c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
 - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
 - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
 - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:
[391-3-1-.02(2)(c)1-4]
- a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
 - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions 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.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
- a. It is a multiple chamber incinerator;
 - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
 - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

8.25 Volatile Organic Liquid Handling and Storage

- 8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.
[391-3-1-.02(2)(vv)(1)]

8.26 Use of Any Credible Evidence or Information

- 8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing

whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

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

8.27 Internal Combustion Engines

- 8.27.1 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standard of Performance for Stationary Compression Ignition Internal Combustion Engines," for diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005. Such requirements include but are not limited to:

[40 CFR 60.4200, 391-3-1-.02(8)(b)77]

- a. Equip all emergency generator engines with non-resettable hour meters.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division.

- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standard of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.

[40 CFR 60.4230, 391-3-1-.02(8)(b)79]

- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

[40 CFR 63.6580, 391-3-1-.02(9)(b)118]

8.28 Boilers and Process Heaters

- 8.28.1 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."

[40 CFR 63.11193]

- 8.28.2 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - “General Provisions” and 40 CFR 63 Subpart DDDDD - “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.”
[40 CFR 63.7480]

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

List Of Standard Abbreviations

[illegible]

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.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	-
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	-
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	-
	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 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. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	-
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	-
	4. Stationary engines burning:	1
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	-
Trade Operations	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	-
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	-
Maintenance, Cleaning, and Housekeeping	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.	-
	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. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	-
	2. Portable blast-cleaning equipment.	-
	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.	-
Maintenance, Cleaning, and Housekeeping	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.	-

Title V Permit

SEGA Biofuels, LLC

Permit No.: 2499-025-0005-V-04-0

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	-
	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 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 Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less 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:	-
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	-
	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 conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	-
	v) Bakery ovens and confection cookers.	-
	vi) Feed mill ovens.	-
	vii) Surface coating drying ovens	-
	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:	-
	i) Activity is performed indoors; &	
	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.	-

Title V Permit

SEGA Biofuels, LLC

Permit No.: 2499-025-0005-V-04-0

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and 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.	-
	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.	-
	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).	-

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
-	-

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.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
MH01 Fuel Handling and Processing Equipment	5	Y	Y	Y
MH02 Dry Wood Chips Handling Equipment	2	Y	Y	Y
MH03 Green Wood Chips Material Handling Equipment	6	Y	Y	Y
MH04 Post Dryer Wood Chips Storage	1	Y	Y	Y

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.	0
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.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

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).