### PERMIT NO. 5093-051-0282-S-01-0 ISSUANCE DATE:



#### **ENVIRONMENTAL PROTECTION DIVISION**

### **Air Quality Permit**

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

Facility Name: Igneo (Georgia), LLC

Facility Address: 760 Old River Road

Savannah, Georgia 31302 Chatham County

Mailing Address: 222 Bloomingdale Road, Suite 402

White Plains, New York 10605

**Facility AIRS Number: 04-13-051-00282** 

is issued a Permit for the following:

Construction and operation of an electronics pyrolysis and recovery facility. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28290 dated February 8, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 12 pages.



Richard E. Dunn, Director

**Environmental Protection Division** 

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#### 1. General Requirements

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

#### 2. Allowable Emissions

2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the Pyrolysis Lines (Source Codes PL01 and PL02) and all silos (Source Codes AS01, AS02, AC01, BC01, and BC02), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified. [391-3-1-.02(2)(b)1.]

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- 2.2 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit. [391-3-1-.02(2)(e)1.]
  - a.  $E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour;
  - b.  $E = 55P^{0.11} 40$ , for process input weight rate in excess of 30 tons per hour.
- 2.3 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in the Pyrolysis Lines (Source Codes PL01 and PL02), unless otherwise specified by the Director. [391-3-1-.02(2)(g)2.]
- 2.4 The Permittee shall not fire any fuel other than natural gas in the Pyrolysis Lines (Source Codes PL01 and PL02) and the Thermal Oxidizers (APCD Code TO01 and TO02). [Avoidance of 40 CFR Part 70 and 391-3-1-.02(2)(g)2 subsumed]
- 2.5 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any gases which contain emissions in quantities exceeding the allowable rate as indicated below:

[Avoidance of 40 CFR Part 70]

- a. Nitrogen oxides (NOx) in excess of 99 tons during any twelve-consecutive month period.
- b. Carbon monoxide (CO) in excess of 99 tons during any twelve-consecutive month period.
- c. Volatile organic compounds (VOC) in excess of 99 tons during any twelve-consecutive month period.
- d. Sulfur dioxide (SO<sub>2</sub>) in excess of 99 tons during any twelve-consecutive month period.
- 2.6 The Permittee shall not discharge or cause the discharge into the atmosphere from each pyrolysis line (Source Codes PL01 and PL02) any gases which contain particulate matter in quantities exceeding 10.50 pounds per hour (lb/hr).

  [Avoidance of 40 CFR Part 70]
- 2.7 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines," for operation of the emergency generator (Source Code EG01). [40 CFR 60.4200]
- 2.8 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and the

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applicable provisions of Subpart A, "General Provisions" as defined in Table 8 to Subpart ZZZZ to Part 63 for operation of the emergency generator (Source Code EG01). [40 CFR 63.6605 and Table 8 to Subpart ZZZZ of Part 63]

- 2.9 The Permittee shall not operate the emergency generator (Source Code EG01) for more than 500 hours, for any reason, during any twelve consecutive month period. The Permittee shall operate the emergency generator (Source Code EG01) according to the requirements specified below. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited: [Avoidance of 40 CFR Part 70]
  - a. The Permittee may operate the emergency generators of the purposes specified in paragraph i. below for a maximum of 100 hours per calendar year. [40 CFR 60.4211(f)(2)]
    - i. The emergency generators may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Division for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency generators beyond 100 hours per calendar year.
  - b. The emergency generators may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in Condition 2.9a. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity without written approval from the Division. [40 CFR 60.4211(f)(3)]
- 2.10 The Permittee shall only burn distillate fuel oil that has a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent in the Emergency Generator (Source Code EG01). [40 CFR 60.4207(b)]

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#### 3. Fugitive Emissions

3.1 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.

#### 4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division. The record shall be retained for at least five years following the date of such maintenance.
- 4.2 The Permittee shall operate the Thermal Oxidizer (APCD Code TO01 and TO02) at all times when the respective Pyrolysis Line (Source Code PL01 and PL02) is being operated. At all times emissions are being vented to the Thermal Oxidizer (APCD Code TO01 and TO02), the temperature of the combustion chamber shall be maintained at or greater than 1,650°F or the value established during the most recent Division-approved performance test. [Avoidance of 40 CFR Part 70, 391-3-1-.02(2)(b) and 391-3-1-.03(2)(c)]
- 4.3 The Permittee shall operate the sorbent injection systems, activated carbon injection system and Baghouse (APCD Code BH01 and BH02) at all times when the respective Pyrolysis Line (Source Code PL01 and PL02) is being operated. The Permittee shall use the most recent test data to develop operating ranges and limits that will ensure proper operation of the equipment and minimization of emissions. The Permittee shall propose operating ranges, limits and

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validation of the values and shall submit the proposed to the Division for approval within 90 days of the completion of the initial performance test required by Condition 6.2. [Avoidance of 40 CFR Part 70, 391-3-1-.02(2)(b), 391-3-1-.02(2)(e) and 391-3-1-.03(2)(c)]

4.4 The Permittee shall demonstrate compliance with emission standards specified in 40 CFR 60, Subpart IIII for the Emergency Generator (Source Code EG01) by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. These records shall be maintained in a format suitable for inspection or submittal.

[40 CFR 60.4211(c)]

4.5 The Emergency Generator (Source Code EG01) shall be operated and maintained according to the manufacturer's emission-related 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)]

#### 5. Monitoring

- 5.1 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.
- 5.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated pollutants and parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
  - a. A continuous emissions rate monitoring system (CERMS) for the nitrogen oxide emission rate of the Pyrolysis Lines (Source Code PL01 and PL02) at a position post air pollution controls. The average NOx emission rate shall be calculated using all data points collected but not less than four data points equally spaced over each hour.
  - b. A continuous emissions rate monitoring system (CERMS) for the carbon monoxide emission rate of the Pyrolysis Lines (Source Code PL01 and PL02) at a position post air pollution controls. The average CO emission rate shall be calculated using all data points collected but not less than four data points equally spaced over each hour.
  - c. The combustion zone temperature of the Thermal Oxidizers (APCD Code TO01 and TO02) at a position prior to any substantial heat loss/exchange. The average combustion

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zone temperature shall be calculated using all data points collected but not less than four data points equally spaced over each hour. The temperature monitoring devices shall have an accuracy of  $\pm 2\%$  (°F).

- d. Injection rate of each substance (i.e., activated carbon and dry sorbent) injected into the dry scrubbers controlling emissions from the Pyrolysis Lines (Source Code PL01 and PL02). Data shall be recorded hourly during operation in pounds per hour.
- e. Pressure drop across each Baghouse (APCD Code BH01 and BH02) controlling emissions from the pyrolysis lines (Source Code PL01 and PL02). The pressure drop shall be monitored continuously, and the data shall be recorded at least once per shift during operation in inches of water column (in.  $H_2O$ ).
- f. A device to measure and record the total hourly weight of feed/charge to each Pyrolysis Line (Source Codes PL01 and PL02). As an alternative to a measurement device, the Permittee may use a procedure acceptable to the Division to determine the total weight of feed/charge to each Pyrolysis Line.
  - i. The accuracy of the weight measurement device or procedure must be  $\pm 1$  percent of the weight being measured. The Permittee may apply to the Division for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
  - ii. The Permittee must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 12 months.
- g. Inlet temperature to each Baghouse (APCD Code BH01 and BH02) controlling emissions from the Pyrolysis Lines (Source Code PL01 and PL02). The temperature shall be monitored continuously, and the data shall be recorded at least once per shift during operation.
- h. A non-resettable hour meter for the Emergency Generator (Source Code EG01) to track the hours operated during emergency service and the hours of operation in non-emergency service (maintenance and/or testing), to record the reason the engine was in operation during those times, and to record the cumulative total hours of operation.

  [391-3-1-.02(6)(b)1 and 40 CFR 60.4209(a)]
- 5.3 The Permittee shall verify that each shipment of distillate fuel oil received for combustion in the Emergency Generator (Source Code EG01) complies with the requirements of Condition 2.10. Verification shall consist of either of the following: [391-3-1-.02(6)(b)1 and 40 CFR 60.4207]

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- a. Fuel oil receipts obtained from the fuel supplier certifying that the distillate fuel oil complies with a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent; or
- b. Analysis of the distillate fuel oil conducted by methods of sampling and analysis which have been specified or approved by the Division which demonstrates that the distillate fuel oil complies with a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent.

#### **6.** Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
  - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
  - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
  - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
  - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
  - e. The Permittee must conduct each test while the affected source or emission unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit.
  - f. During the performance test(s) conducted to determine an emission factor, the Permittee shall measure (or otherwise determine) and record the total weight of feed/charge for the Pyrolysis Line (Source Codes PL01 and PL02) being tested, for each of the three test runs and calculate and record the total weight.

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- 6.2 Within 180 days after startup of each Pyrolysis Line (Source Codes PL01 and PL02), the Permittee shall conduct performance tests for particulate matter (PM), HCl, HF, and the Metal HAPs: antimony, arsenic, cadmium, chromium, cobalt, manganese, nickel, lead, and mercury emissions. Performance tests shall be conducted at the maximum expected feed rate. The permittee shall use USEPA Test Methods 5, 26A and 29 or alternative methods approved by GA EPD. Following the initial performance tests, subsequent performance testing on each Pyrolysis Line (Source Codes PL01 and PL02) for particulate matter (PM) emissions shall be conducted within 60 months of the last test.
- 6.3 Within 180 days after startup of each Pyrolysis Line (Source Codes PL01 and PL02), the Permittee shall conduct performance tests for volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions to determine emission factors in units of pounds per ton of input (lb/ton). Performance tests shall be conducted at the maximum expected feed rate. The permittee shall use USEPA Test Methods 6C and 25A or alternative methods approved by GA EPD. Following the initial performance tests, subsequent performance testing on each Pyrolysis Line (Source Codes PL01 and PL02) for volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions shall be conducted within 60 months of the last test.
- 6.4 If NOx and CO CERMS are installed, operated, maintained and certified in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants, the CERMS can be used as an alternative to the initial and subsequent performance testing for nitrogen oxides (NOx) and carbon monoxide (CO) emissions. Within 180 days after startup of each pyrolysis line (Source Codes PL01 and PL02), the Permittee shall conduct a relative accuracy test audit (RATA) on the NOx and CO CERMS required by Condition 5.2. The RATAs shall be performed in accordance with the procedures found in the appropriate performance specifications 2, 4, or 4A in Appendix B of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
- 6.5 During the performance tests for VOC required by Conditions 6.3, the Permittee shall determine the 3-hour average temperature in the thermal oxidizer combustion chamber using the device required by Condition 5.2c. The 3-hour average temperature shall be submitted as part of the performance test report.

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

7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:

Mr. Sean Taylor Stationary Source Compliance Program 4244 International Parkway, Suite 120 Atlanta GA 30354

7.2 The Permittee shall maintain 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

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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-.02(6)(b)1]

- 7.3 For each calendar month, the Permittee shall maintain the following records. These records shall be available for inspection or submittal to the Division upon request. These records shall be retained for a period of five years following the last date of record.
  - a. Records of the process input weight (in tons) of each Pyrolysis Line (Source Codes PL01 and PL02) determined using the devices required by Condition 5.2f. These records shall be used to calculate the monthly process input weight (in tons) for each Pyrolysis Line (Source Codes PL01 and PL02). All the calculations shall be kept as part of the record.
  - b. Records of the hours of operation for the emergency generator (Source Code EG01) determined using the device required by Condition 5.2h. The records shall note emergency and any non-emergency hours of operation and the reason for the non-emergency operation.
- 7.4 The Permittee shall maintain fuel oil receipts obtained from fuel supplier certifying that the distillate fuel oil fired in Emergency Generator (Source Code EG01) complies with a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent. Records shall be maintained for a period of five (5) years in a format suitable for inspection by or submission to the Division.
- 7.5 For each calendar month, the Permittee shall determine the monthly total emissions (in tons) of NOx, CO, VOC, and SO2 emitted from the entire facility using the following procedures:
  - a. For NOx:

$$NOx = \frac{\sum E_{PL01,NOx} + \sum E_{PL02,NOx} + (HR_{EG01})(KW_{EG01})(EF_{EG01,NOx})}{2,000 \ lbs/ton}$$

Where,

E<sub>PL01,NOx</sub> = Emissions of NOx in pounds from pyrolysis line (Source Code PL01) for every hour in the calendar month as measured by the devices required by Condition 5.2a.

 $E_{PL02,NOx}$  = Emissions of NOx in pounds from pyrolysis line (Source Code PL02) for every hour in the calendar month as measured by the devices required by Condition 5.2a.

HR<sub>EG01</sub> = Total monthly hours of operation of the emergency generator (Source Code EG01) recorded in accordance with Condition 7.3b.

 $KW_{EG01}$  = Name plate rating of the emergency generator (Source Code EG01) in kW.

 $EF_{EG01,NOx} = NOx$  emission factor for  $EG01 = 1.41 \times 10^{-2}$  lb/kW-hr.

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b. For CO:

$$CO = \frac{\sum E_{PL01,CO} + \sum E_{PL02,CO} + (HR_{EG01})(KW_{EG01})(EF_{EG01,CO})}{2,000 \ lbs/ton}$$

Where,

E<sub>PL01,CO</sub> = Emissions of CO in pounds from pyrolysis line (Source Code PL01) for every hour in the calendar month as measured by the devices required by Condition 5.2b.

 $E_{PL02,CO}$  = Emissions of CO in pounds from pyrolysis line (Source Code PL02) for every hour in the calendar month as measured by the devices required by Condition 5.2b.

HR<sub>EG01</sub> = Total monthly hours of operation of the emergency generator (Source Code EG01) recorded in accordance with Condition 7.3b.

KW<sub>EG01</sub> = Name plate rating of the emergency generator (Source Code EG01) in kW.

 $EF_{EG01,CO} = CO$  emission factor for  $EG01 = 7.72 \times 10^{-3}$  lb/kW-hr.

c. For VOC:

$$VOC = \frac{(EF_{PL01,VOC})(P_{PL01}) + (EF_{PL02,VOC})(P_{PL02}) + (HR_{EG01})(KW_{EG01})(EF_{EG01,VOC})}{2,000 \ lbs/ton}$$

Where,

EF<sub>PL01,VOC</sub> = Emission factor for VOC in lb/ton from pyrolysis line (Source Code PL01 determined in accordance with Condition 6.3.

EF<sub>PL02,VOC</sub> = Emission factor for VOC in lb/ton from pyrolysis line (Source Code PL02) determined in accordance with Condition 6.3.

P<sub>PL01</sub>, P<sub>PL02</sub> = Process input to the pyrolysis lines for the calendar month recorded in accordance with Condition 7.3a.

HR<sub>EG01</sub> = Total monthly hours of operation of the emergency generator (Source Code EG01) recorded in accordance with Condition 7.3b.

 $KW_{EG01} = Name plate rating of the emergency generator (Source Code EG01) in kW.$ 

 $EF_{EG01,VOC} = VOC$  emission factor for  $EG01 = 4.78 \times 10^{-4} \text{ lb/kW-hr}$ .

d. For  $SO_2$ :

$$SO2 = \frac{(EF_{PL01,SO2})(P_{PL01}) + (EF_{PL02,SO2})(P_{PL02}) + (HR_{EG01})(KW_{EG01})(EF_{EG01,SO2})}{2,000 \ lbs/ton}$$

Where,

EF<sub>PL01,SO2</sub> = Emission factor for SO<sub>2</sub> in lb/ton from pyrolysis line (Source Code PL01 determined in accordance with Condition 6.3

EF<sub>PL02,SO2</sub> = Emission factor for SO2 in lb/ton from pyrolysis line (Source Code PL02) determined in accordance with Condition 6.3

 $P_{PL01}$ ,  $P_{PL02}$  = Process input to the pyrolysis lines for the calendar month recorded in accordance with Condition 7.3a

HR<sub>EG01</sub> = Total monthly hours of operation of the emergency generator (Source Code EG01) recorded in accordance with Condition 7.3b

 $KW_{EG01} = Name plate rating of the emergency generator (Source Code EG01) in kW$ 

 $EF_{EG01,SO2} = VOC$  emission factor for  $EG01 = 9.05 \times 10^{-6}$  lb/kW-hr.

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- 7.6 The Permittee shall use the monthly records required in Condition 7.5 to calculate the twelve-month rolling total of NOx, CO, VOC, and SO<sub>2</sub> emissions from the entire facility for each calendar month. All the calculations shall be kept as part of the records required in Condition 7.2. The Permittee shall notify the Division in writing within 15 days if any of the twelve-month rolling totals equals or exceeds the emission limits in Condition 2.5.
- 7.7 The Permittee shall submit a report to the Division, in accordance with the requirements of Condition 7.8, for each semiannual reporting period in which deviations have occurred. Deviations are defined as follows:
  - a. Any 12-consecutive month period of operation during which the NOx, CO, VOC, or SO2 emissions determined in Condition 7.6 exceeds the emission limit in Condition 2.5.
  - b. Any three-hour period of operation during which the average combustion temperature measured using the device required by Condition 5.2c. falls more than 50°F below the temperature established in Condition 4.2.
- 7.8 The Permittee shall submit a written report of deviations for each semiannual period. The report shall cover each semi-annual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively. The report shall kept as part of the records required by Condition 7.2 and shall contain as a minimum the following:
  - a. The nature and cause of the deviation, the time and date of occurrences, and any initial and final corrective action taken.
  - b. A summary of any days for which any of the required operation and maintenance surveillance checks were not made and the reason for such failure to perform the surveillance.
  - c. Any corrective actions taken to prevent any further deviations.

#### 8. Special Conditions

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

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### ATTACHMENT A

**Equipment List** 

| Emission Unit |  | Control Device |                       |
|---------------|--|----------------|-----------------------|
| Source        | Description                              | Source         | Description           |
| Code          |  | Code           |                       |
|               |  | TO01           | Thermal Oxidizer      |
| PL01          | Pyrolysis Line No. 1                     | SR01           | Urea Injection (SNCR) |
|               |  | BH01           | Baghouse/Dry Scrubber |
|               |  | TO02           | Thermal Oxidizer      |
| PL02          | Pyrolysis Line No. 2                     | SR02           | Urea Injection (SNCR) |
|               |  | BH02           | Baghouse/Dry Scrubber |
| AS01          | Pyrolysis Ovens Baghouse Dust Silo No. 1 | BH03           | Bin Vent Baghouse     |
| AS02          | Pyrolysis Ovens Baghouse Dust Silo No. 2 | BH04           | Bin Vent Baghouse     |
| AC01          | Activated Carbon Storage Silo            | BH05           | Bin Vent Baghouse     |
| BC01          | Sodium Bicarbonate Storage Silo No. 1    | BH06           | Bin Vent Baghouse     |
| BC02          | Sodium Bicarbonate Storage Silo No. 2    | BH07           | Bin Vent Baghouse     |
| EG01          | Emergency Generator                      |                |                       |