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ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Heather Brown

FROM: Anna Gray

DATE: March 24, 2023

Facility Name:	**Nexus Circular - McDonough Facility**
AIRS No.:	04-13-151-00065
Location:	McDonough, GA (Henry County)
Application #:	28698
Date of Application:	January 19, 2023

Background Information

The Nexus Circular - McDonough facility is located at 201 King Mill Court, McDonough, Georgia 30253. are
The facility will be new synthetic minor source with respect to the Title V program, as potential criteria emissions of all pollutants are below the major source threshold of 100 tpy for criteria pollutants. The facility will be a minor source with respect to emissions of hazardous air pollutants (HAP), as potential emissions of individual HAP and total HAP are below the major source thresholds of 10 tpy and 25 tpy, respectively.

Nexus is planning to construct and operate an advanced plastics recycling facility. This process utilizes hard to recycle plastic materials as feedstock to generate useful petroleum products, which are utilized in the plastic supply chain. The facility will consist of the following equipment: sixteen feedstock shredders, sixteen plastics extruders, sixteen scrubbers, twenty-four pyrolysis reactors, two flares, electric dryers, twenty-four internal combustions engines for internal power generation, four oil storage tanks, nine wax storage tanks, four emergency generators and a loadout via truck and rail. The facility will have eight production lines with two extruders and scrubbers per line to control Hydrogen chloride (HCl) emissions.

Purpose of Application

SIC 2869, Industrial Organic Chemicals, Not Elsewhere Classified

Application No. 28698 was received January 19, 2023, for the initial construction of an advanced plastics recycling facility.

The process for the facility starts with the feedstock material that comes from a variety of suppliers that have large volumes of used plastics that if not processed at the proposed facility, would be disposed of in a landfill. These materials are not solid waste, but currently lack the infrastructure to be managed economically through other means. The materials are brought to the facility where they undergo a quality control evaluation and are then sorted into process feedstock.

The incoming material (typically compressed bales) undergoes a size-reduction stage prior to processing. The shredders are located indoors and are used to reduce the size of plastic feedstock. There are no expected particulate emissions from the shredders as there are not vents or stacks over these units.

Solid plastic feedstock is fed through the extruders to convert to molten plastic. Hydrogen chloride (HCl) emissions are produced from the extrusion process and all gases sent to the scrubbers prior to exhausting to the atmosphere. The extruders convey the molten plastic towards the pyrolysis reactors, where heat is used in the absence of oxygen to break downs the plastic compounds. Process gas from the reactors is routed to the distillation system. Condensable components are turned into useful petroleum products and are stored and sent out to be used in the plastic supply chain.

Onsite storage tanks, including oil storage tanks and wax storage tanks, store the petroleum products prior to loading into trucks or rail for shipment. The hydrocarbon slurry is expelled from the reactor and turned to dry powder as it passes through the dryers.

Non-condensable process gas is routed to the internal combustion engines, which will efficiently use the process gas as fuel to generate electricity to power the pyrolysis reactors. During any malfunction, process upset, startup/shutdown periods, the non-condensable gases will pass through the flares.

A Public Notice expired February 24, 2023.

Equipment List

Emission Units			Associated Control Devices	
Source Code	**Description**	**Installation Date**	**Source Code**	**Description**
SH01-SH16	Shredder Nos. 1-16	2023	-	-
EX01-EX16	Extruder Nos. 1-16	2023	SC01-SC16	Scrubber Nos. 1-16
PB01-PB24	Pyrolysis Reactors Nos. 1-24 (Electric)	2023	FB01-F02	Flare Nos. 1-2
FB01-F02	Flare Nos. 1-2	2023	-	-
CT01-CT02	Cooling Tower 1-2	2023	-	-

Storage Tanks

Source Code	Capacity (gallons)	Contents	Installation Date	True Vapor Pressure (psia)
ST01-ST04	440,823	Oil Storage Tank Nos. 1-4	2023	3.30
ST05-ST13	168,000	Wax Storage Tank Nos. 5-13	2023	0.14

Fuel Burning Equipment

Source Code	Input Heat Capacity (MMBtu/hr)	Description	Installation Date	Design Capacity
IC01-IC24	12.5	Internal Combustion Generator Nos. 1-24 (Process Gas)	2023	350 kW
EG01-EG04	29.5	Emergency Generator Nos. 1-4 (Diesel)	2023	500 kW

Emissions Summary

The extruders are a source of individual HAP emissions of HCl. An HCl emission factor was developed based on pilot facility testing of PVC containing plastics, which emit HCl when heated. Nexus's feedstock quality specifications limit the amount of PVC and materials containing other contaminants from all specified feed streams. Nexus believes that the maximum amount of PVC-containing materials is not more than 0.05%, or 500ppm, of the blended feedstock stream entering the process. Chlorine (Cl) concentration by weight in PVC plastic has been measured at 33.1%. All Cl is assumed to produced HCl. The temperature in the extruder increases along the process from 30℃ to a maximum of 300℃ and has a maximum residence time from ambient to 300℃ of 1 minute. According to a PVC film study, the film was found to have been 20% dechlorinated after 30 minutes. Assuming the reaction reaches equilibrium in the first five minutes and proceeds linearly, then 1 minute out five minutes (or one-fifth) of 20% is equal to 4% dechlorination.

The potential HCl emission rate is calculated as follows:

$$HCl\ Emission\ Factor\left(\frac{lb\ HCl}{lb\ \ feedstock}\right)$$
$$= Max.PVC\ Input\ Concentrations\left(\frac{\text{lb PVC}}{\text{lb feedstock}}\right) * HCl\ Percentage\ in\ PVC\left(\frac{lb\ HCl}{lb\ \ feedstock}\right)$$
$$* \text{Decomposition of PVC at Extruders}$$
$$= 0.05\%\ \text{PVC contamination} * 33.1\%\ \text{Cl} * 4\%\ \text{decomposition}$$
$$= 0.00066\%$$

Hourly potential emissions of HCl are based on the maximum throughput (lb/hr) for eight production lines, multiplied by the HCl emission factor. Emissions take into account the anticipated scrubber control efficiency of 99.5%. Annual potential emissions are based on an assumed annual operation of 8,760 hours.

Potential emissions from the pyrolysis reactors are based on hours of operation and respective emission factors for process gas combustion in the IC generators and flares. The potential emission include two scenarios for process gas combustion: Operating Scenario 1, which is standard operation where all process gas is combusted in the IC generators, and Operating Scenario 2, where various flaring events occur, and the remainder of the time process gas is combusted in the generators. Operating Scenario 2 includes start up events, shutdown, process upsets, and maintenance activities that would result in sending process gas to the flares. Nexus has estimated the mass flow rate of flow gas, duration, and frequency of occurrence for these events over a given year. As these scenarios are considered outside of the normal operation of the McDonough facility, it is difficult to estimate a proposed amount of time for these flaring scenarios to occur. Therefore, Nexus has assumed each of these events would occur for one hour every two weeks. Emissions from the flare scenarios are quantified as described above, and the remaining time it is assumed the process gas is combusted in the generators. A worst case set of potential emissions was compared to the potential emissions from Operating Scenario 1 and Operation Scenario 2 and utilized the maximum emissions.

Potential emissions from the storage tanks were calculated utilizing TankESP tool, which uses methodology from AP-42 Chapter 7.1 (Organic Liquid Storage Tanks), to generate working and breathing losses for each tank type. Nexus performed an analysis of the oil material to determine mass percentages of relevant compounds, which was utilized with the parameters entered on the TankESP tool. Details of the parameters and inputs are included in the Appendix C of the application.

Loadout emissions of VOC are estimated using the methodology outlined in AP-42 Section 5.2 for transportation of petroleum liquids. Relevant operating parameters of the material loadout were used to calculate the loading emission factor. The loading loss emission factor is calculated as follows:

$$L_l = 12.46 * S * P * \frac{M}{T}$$

Where L_l = loading loss, pounds per 1000 gallons ($lb/10^3$) of liquid loaded
S = a saturation factor from Table 5.2.1
P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia)
M = molecular weight of vapors, (lb/lb-mole)
T = temperature of bulk liquid loaded, °R

The loading loss emission factor is multiplied by the potential throughput of either wax or oil loaded to generate potential emissions from loading. Nexus will perform blowout of loading and unloading and direct it to the flares, as a control. As such, a 95% control efficiency is applied to uncontrolled loading losses to determine the control emission rate.

To calculate tank loadout emissions of individual HAP, the liquid phase speciation profile of each HAP was utilized by TankESP to determine the vapor phase speciation profile for each respective HAP. Emissions of the various HAPs that constitute the oil were calculated by applying the same methodology as the VOC emissions calculations from AP-42 Section 5.2 and a control efficiency of 95%.

The Filterable PM, PM_{10} and $PM_{2.5}$ emissions from the Cooling Towers are estimated using manufacturer specifications as well as calculation methodology and appropriate assumptions specified in AP-42 Section 13.4. the resulting emissions of PM are likely overestimated using AP-42 references, and the actual potential to emit is likely much lower.

The potential emission factors from the diesel emergency engines are based on AP-42, Chapter 3.3 Table 3.3-1 for uncontrolled Gasoline and Diesel Industrial Engines. The CO emission factor is based on manufacturer guarantees based on EPA Tier 3 emission standards. Annual potential emissions are based on an assumed operating time of 500 hours per year.

Facility-Wide Emissions
(in tons per year)

Pollutant	Uncontrolled Potential Emissions	Controlled Actual Emissions
Max. Individual HAP [1]	0.43	0.30
Total HAP	2.82	0.42
CO	45.1	<45.1
NOx	41.8	<41.8
PM/PM2.5/PM10	43.3	<43.3
SO_2	1.4	<1.4
VOC	114.04	23.2

[1] Maximum Individual HAP is Hexane

Regulatory Applicability

The McDonough Facility is located in Henry County, which is listed as one of the counties with additional provisions for ozone non-attainment areas, with major stationary source thresholds of 100 tons per year of VOC or NOx. The uncontrolled VOC PTE from the McDonough Facility is more than 100 tpy; however, the facility will operate the flares to control the emissions from the storage tank loadout losses. Thus, the facility is classified as a synthetic minor source of VOC emissions.

Georgia Rule (b) – Visible Emissions
This rule limits the visible emissions of all sources to less than 40% opacity. This rule applies to all sources at the facility unless a more specific visible emissions limit is established elsewhere in the Georgia Rules.

Georgia Rule (d) – Fuel-burning Equipment
This rule establishes PM emissions from fuel burning equipment whose primary purpose use is the production of thermal energy. The purpose of the internal combustion generators will be to combust the non-condensable gases as fuel to generate electricity, not to produce steam or heat, thus do not fall under Georgia's definition of fuel burning equipment. As such, equipment on site will not be subject to this rule nor will any equipment on-site be subject to all subsequent fuel-burning equipment rules in GRAQC 391-3-1-02.

Georgia Rule (e) – PM from Manufacturing Processes
This rule establishes PM emissions from manufacturing processes. This regulation applies to extruding lines at the Nexus-McDonough facility. Nexus will ensure compliance with this rule through the use of scrubbers, with 95% control efficiency.

Georgia Rule (g) – Sulfur Dioxide
This rule establishes SO_2 emission limits for fuel-burning sources, not "equipment". The emergency generators will be subject to more stringent fuel standard of 15 ppm through NSPS Subpart IIII, thereby subsuming the Rule (g) sulfur limit. The IC generators will burn process gas having a sulfur content below 2.5% by weight and will comply with Rule (g).

Georgia Rule (n) – Fugitive Dust
This rule requires that reasonable precautions be taken to prevent fugitive dust from becoming airborne. Transportation operations at the facility are subject to this rule. The appropriate precautions will be taken to

prevent fugitive dust from becoming airborne and ensure that the opacity from fugitive dust sources is less than 20% as required by this rule.

Georgia Rule (tt)- VOC Emissions from Major Sources VOC Emissions from Major Sources
This regulation applies to facilities located in Henry County with potential VOC emissions exceeding 25 tons per year. The McDonough Facility will be located in Henry County; however, the facility is subject to Georgia Rule (vv) and is therefore exempt to the requirements of this rule (Pursuant to subsection 5 of Georgia Rule (tt)).

Georgia Rule (vv)- Volatile Organic Liquid Handling and Storage
This regulation applies to facilities subject to other VOC requirements contained in GRAQC 391-3-1-.02; therefore, Nexus is subject to the requirements of this regulation. This rule requires that no person subject to other VOC requirements contained in other subsections of this rule may transfer or cause or allow the transfer of any volatile organic liquid other than gasoline from any delivery vessel into a stationary storage tank of greater than 4,000 gallons, unless the tank is equipped with submerged fill pipes,

Nexus will have nine (9) wax tanks each with capacities of 168,000 gallons and four (4) oil tanks each with capacities of 440,000 gallons. As such, the tanks on-site will be subject to this rule. Nexus will ensure compliance with this rule by equipping each tank with submerged fill pipes.

Georgia Rule (yy)- NOx Emissions from Major Sources
This regulation establishes NOx standards for specific counties in Georgia with emissions of greater than 25 tons per year. The facility will be located in Henry County and has facility-wide emissions greater than 25 tons. Under this rule,

> *"... The requirements contained in this subsection shall not apply to individual equipment at the source which are subject to subsections (jjj), (W), (mmm), or (nnn) of this section 391-3-1-.02(2)" and*

> *"...the emissions of nitrogen oxides from any source shall exclude all nitrogen oxides emissions subject to subsections (jjj), (W), (mmm), or (nnn) of this section 391-3-1-.02(2), "*

The IC generators are subject to GRAQC 391-3-1-02(2)(mmm) and constitute 21.02 tons of the total emissions of NOx from the facility. Thus, excluding emissions of NOx from the IC generators, facility emissions of NOx are below the 25 ton per year threshold. As such, the facility is not subject to the requirements of this rule.

Georgia Rule (mmm) - NOx Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity
This regulation establishes NOx standards for specific counties in Georgia during peak Ozone season, from May 1 to September 30 of each year. The rule applies to stationary engines rated between 100 kW and 25 megawatts (MW). The McDonough facility is located in Henry County, which is one of the counties to which this rule applies. The IC generators on-site will have a heat input of 350 kW, and as such are subject to the rules of this regulation. For stationary engines installed or modified on or after October 1, 1999, emissions of NOx shall be limited to 80 ppm @ 15% 02 on a dry basis.

Based on the composition of the process gas burned in the engines, this equates to a limit of 0.31 lb/hr. The engines will inherently comply with this rule, with a maximum emission rate of 0.20 lb/hr.

NSPS Subpart Kb – Volatile Organic Liquid Storage Vessels
Subpart Kb applies to storage vessels with a capacity of greater than or equal to 75 m^3 (about 19,800 gallons) that are used to store volatile organic liquids. The Nexus facility will have oil and wax storage tanks with capacities greater than the thresholds of this subpart. Three storage tanks at the facility are subject to this subpart. The wax storage tanks at the facility exceed a capacity of 151 rn^3 (39,890 gallons); however, the true vapor pressure of the wax is less than 3.5 kPa and is exempt from the requirements of this subpart. The true vapor pressure of the oil to be stored is greater than 3.5 kPa, thus, NSPS Subpart Kb is applicable to the oil storage tanks at the facility.

The oil tanks will be equipped with fixed roofs in combination with internal floating roofs, and as such, will be subject to the testing, monitoring, reporting and recordkeeping requirements specified in 40 CFR 60.113b, 60.115b and 60.116b.

NSPS Subpart IIII – Stationary Compression Internal Combustion Engines
This rule applies to owners of stationary CI engines that commence construction after July 11, 2005 where the ICE were manufactured after April 1, 2006 are not fire pump engines or were manufactured as a National Fire Protection Association (NFPA) fire pump engine after July 1, 2006. This subpart also applies to CI ICE modified or reconstructed after July 11,2005. The emergency engines will be manufactured after April 1, 2006, and as such, will be subject to the requirements of this rule.

The emergency engines will each be rated at 500 kW or 670 hp. Pursuant to 40 CFR 60.4202(d), the emergency generators must be certified to meet the applicable emission standards of Table 4 of NSPS Subpart IIII, and Nexus will comply with these emission limits pursuant to 40 CFR 60.4205(c). Pursuant to 40 CFR 60.4211(a) and (c), compliance with these emissions standards is met by:

- Operating and maintaining the engine according to manufacturer's emission-related written instructions.
- Changing only those emission-related settings that are permitted by the manufacturer.
- Meeting the requirements of 40 CFR Part 89, 94, and/or 1068 as applicable.
- Purchasing an engine certified to the emission standards; and
- Installing and configuring the engine according to manufacturer's emission-related specifications.

The engines will be equipped with a non-resettable hour meter pursuant to the requirements of 40 CFR 60.4209(a). Pursuant to 40 CFR 60A207(b), purchased diesel fuel will meet the requirements of 40 CFR 80.501(b) for nonroad diesel fuel.

NSPS Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines
Pursuant to 40 CFR 60.4230(a)(4) and (5), owners and operators of certain stationary SI ICE that commence construction after June 12, 2006, or stationary SI ICE that are modified or reconstructed after June 12, 2006 are subject to NSPS Subpart JJJJ. The IC generators will be constructed after June 12, 2006, and as such are subject to the requirements of this rule.

NSPS Subpart JJJJ establishes emission limitations for different types of engines. The IC generator engines, each rated at 350 kW (or 469 hp), meet the definition of a stationary internal combustion engine in 40 CFR 60.4248. Pursuant to 40 CFR 60.4233(e), the IC generators must meet the emission standards of Table 1 to NSPS Subpart JJJJ for all pollutants.

The table below summarizes the applicable emissions standards:

Pollutant	Emission Standards (g/hp -hr)	Emission Standards (ppm 15% O_2)
NOx	1.0	82
CO	2.0	270
VOC[a]	0.7	60

[a.] Excludes formaldehyde

Because the IC generators subject to emissions standards under 40 CFR 60.4233(e), have not been certified by the manufacturers according to the procedures in NSPS Subpart JJJJ, Nexus is required to conduct initial and subsequent performance test of the engines.

NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines
Pursuant to 40 CFR 63.6590(a)(2)(ii), the emergency engines and IC generators will be considered new units under the RICE MACT as they are compression ignition (CI), or diesel, engines constructed after June 12, 2006 and rated at 500 kW or 670 hp and 350 kW or 469 hp, respectively, with a non-resettable hour meter located at an area source of HAP. Pursuant to 40 CFR 63.6590(c)(1), the emergency engines and IC generators comply with this subpart by meeting the requirements of 40 CFR 60 Subpart IIII and 40 CFR 60 Subpart JJJJ, respectively.

Permit Conditions

Conditions 1.1 through 1.5 are general requirements for the facility. These conditions are standard language for every SIP permit issued.

Condition 2.1 limits the facility-wide VOC emissions to 99 tpy, so that the facility will be a SM source under Title V.

Condition 2.2 is the opacity limit for all process equipment under Georgia Rule (b).

Condition 2.3 is the PM limit for the process equipment under Georgia Rule (e).

Condition 2.4 requires that fuel fired in any fuel burning source not contain any more than 2.5 percent sulfur, by weight.

Condition 2.5 requires the permittee to install storage tanks equipped with submerged fill pipes for the transferring of oil from any delivery vessel into a stationary tank.

Condition 2.6 specifies the NOx emission limits for the IC engines according to Georgia Rule (mmm).

Condition 2.7 and 2.8 state the NSPS, 40 CFR 60, Subpart A – "General Provisions" and NSPS, 40 CFR 60 Subpart JJJJ – "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," requirements for the IC engines (Source Codes IC01 through IC24).

Condition 2.9 state the NSPS, 40 CFR 60, Subpart A – "General Provisions" and NSPS, 40 CFR 60 Subpart IIII – "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines," requirements for the emergency generator (Source Codes EG01 through EG04).

Condition 2.10 requires the facility to comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart A, "General Provisions," and Subpart ZZZZ, "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of engines IC01 through IC024 and the emergency generators EG01 through EG04. The facility will comply with this condition by fulfilling Condition 2.9.

Condition 2.11 requires the facility to comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60; in particular Subpart A "General Provisions" and Subpart Kb – "Standards of Performance for Volatile Organic Liquid Storage Vessels" (Including Petroleum Liquid Storage Vessels).

Permit Condition No. 3.1 states the requirements of Georgia State Rule 391-3-1-.02(2)(n) for limiting fugitive dust emissions.

Condition 4.1 is a general applicability condition which requires the facility to use good operating practices with regard to the maintenance of air pollution control equipment.

Condition 4.2 requires the operation of the scrubbers during all times of extruders operation.

Condition 4.3 requires proper operation of the emergency generator (Source Codes No. EG01 through EG04), according to NSPS IIII.

Condition 5.1 is a general applicability condition for operation, maintenance and repair of monitoring systems.

Conditions 5.2 and 5.3 specify the Extruder Scrubber (Source Code SC01 through SC16) indicators to be monitored and require that data be logged once per 8-hour shift in order to provide reasonable assurance the scrubber is operating properly.

Condition 5.4 requires monitoring and recording of the voltage produced by the flame rod of the flares (Source Codes FB01 and FB02). The flame rod is used to monitor the flare pilot flame. The voltage shall be recorded once per 8-hour shift to provide reasonable assurance the flare is on standby.

Condition 5.5 specifies the IC engine requirements of Georgia Rule (mmm) to monitor NOx emissions between March 1 and May of each calendar year through three test measurements of 30 minutes in duration each.

Conditions 5.6 was added for the requirements of Georgia Rule (mmm) to operate the IC engines with the settings determined after the annual NOx measurement and to certify and record no later than October 15 of each year that no adjustments were made to the engines by the Permittee or third party.

Condition 5.7 states the monitoring and record requirements of the parameters fot the emergency generators according to NSPS Subpart IIII.

Condition 6.1 is a general applicability condition that lists the facility's obligations in the event the Division requests a performance test.

Condition 6.2 states the IC engines requirement to conduct initial performance testing for NOx, CO and VOC according to 40 CFR 60.4243(f) of 40 CFR 60, Subpart JJJJ.

Condition 6.3 states the general requirements of performance tests to be conducted within 60 days after achieving the maximum production rate but not later than 180 days after initial startup per 40 CFR 60.8(a).

Condition 7.1 is general applicability record keeping and reporting requirements.

Condition 7.2 requires the Permittee to submit indicator operating ranges for the Extruder Scrubber Scrubbers (Source Codes SC01 - SC16) within 45 days of startup; requires corrective action if the Extruder Scrubbers are operating outside of the normal range(s); and specifies the minimum record keeping requirements for any deviations.

Condition 7.3 requires submittal of semiannual reports of deviations for the Extruder Scrubber Scrubbers (Source Codes SC01-SC16) and Flares (FB01 and FB02); define the reporting period and submission deadlines for the semiannual report(s); and specify the minimum data to be included in the semiannual report(s).

Conditions 7.4-7.5 cover record keeping as required by NSPS Kb for the oil tank inspections. As written in condition 2.14, the facility must comply with the record-keeping requirement of Subpart Kb Section 60.115b.

Condition 7.6 was added to request the facility to submit a written notification of the facility line startup within 15 days after such date.

Condition 8.1 is a general applicability condition that allows the Division to amend the permit to protect public health, safety, and welfare.

Condition 8.2 requires the facility to submit annual Permit fees for the Nexus Circular-McDonough facilty.

Toxic Impact Assessment

A Toxic Impact Analysis (TIA) was performed in accordance with the Guideline. Section 2.2 of the Guideline requires a comparison between the facility-wide emission rate and the MER. For a pollutant that has a facility-wide emission rate above the MER, the Guidelines requires the use of screening model (SCREEN3) or refined models (AERMOD) to determine the maximum ground level concentrations for TAP.

Potential emissions of all TAP are below the respective MER (see comparison results in Appendix D of the application); therefore, the McDonough Facility is in compliance with the requirements of TIA and no modeling is required.

Summary & Recommendations

A Public Advisory expired February 24, 2023. No comments were received.

The facility will be a synthetic minor source of VOC due to control requirements established in accordance with this permit. SSCP – Air Toxics Unit will be responsible for receiving the compliance reports from the facility. I recommend the approval of the new processes and operation of the new facility through the issuance of Air Quality Permit No. 2869-151-0065-S-01-0.