GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

TO: Heather Brown

FROM: Joe Aisien

DATE: August 10, 2023

Facility Name:	**SungEel Recycling Park Georgia, LLC**
AIRS No.:	257-00060
Location:	Toccoa, GA (Stephens County)
Application #:	28891
Date of Application:	May 22, 2023

Background Information

The proposed facility is SungEel Recycling Park Georgia, LLC (SungEel). The planned location is 32 Hayes-Wilbanks Road, Toccoa in Stephens County. This facility is new and is a synthetic minor source according to Title V rules because the emission rates of criteria pollutants will be limited to less than the Title V major source threshold of 100 tons per year (ton/yr). The facility is also a minor source of hazardous air pollutants (HAP) because the potential to emit any individual hazardous air pollutant is less than 10 tons per year (ton/yr) and the potential to emit a combination of HAPs is less than 25 ton/yr. The facility will recycle lithium-ion.

Purpose of Application

The application is seeking authorization to construct and operate a lithium-ion battery recycling facility. The application was received on May 30, 2023 and assigned number 28891. The public advisory expired on July 7, 2023. Six public comments were received in response to the public advisory and have been taken into consideration for the draft permit.

The manufacturing processes proposed by SungEel include dismantling of the battery modules to prepare the cells, shredding, heating the cells in a rotary-type (RT) dryer, then cooling, grinding, and separating the products. SungEel plans to install two identical recycling process lines. The description of the process is included below.

Delivery of Raw Material
Raw material will include modules, cells, terminals, and packs containing the lithium-ion batteries. The raw materials will be delivered to the SungEel facility in both dry and wet conditions. The dry materials will arrive in wooden cases, cardboard boxes in pallets, and dedicated plastic trays. The pre-discharged materials are transported in water and will arrive in sealed, dedicated water discharge totes. The wet materials will be kept separate from the dry materials and the water from the water discharge totes will be dispensed into a sump and then pumped into a holding tank for monthly disposal offsite. Any vapors from the area (i.e., the Water Discharging Zone No. 1) will be routed to a duct and sent through an activated carbon tower for fluorine and volatile organic compounds (VOC) removal.

Electrical Discharge and Module Disassembly

The first step of the recycling process is the electrical discharge of the batteries to reduce the potential danger of high voltage. After electrical discharge, the battery modules are disassembled to obtain the cells. There are four types of cutting machines used for the various types of cells:

- Pressed-type cutting machine,
- Cell auto cutting machine,
- Polypropylene separator machine, and
- Circle cell module cutting machine.

Emissions from the cutting machines will be negligible.

Nitrogen Generation

A nitrogen purge is used in the crushing and drying process to clean the piping and remove contaminants and oxygen in order to prevent unstable and potentially ignitable conditions. The nitrogen will be generated in a closed loop system. No emissions are expected.

Crushing Process (N_2 Shredding)

Battery cell modules from the cutting machines are subject to coarse shredding, prior to being heated in a RT dryer. A nitrogen purge from the nitrogen generation plant will be used to prevent ignitable conditions. Emissions from the crushing machine are routed to the atmospheric protection facility after the dryer.

Drying and Cooling

The crushed material is then heated in an electric-powered rotary-type dryer and then cooled in a rotary-type cooler. The heat-treated cell module shreds are routed to the finishing product lines. Air flow from the dryer is directed to the multi-stage atmospheric protection facility.

Finishing Product Lines for Cell Modules

After the RT dryer and cooler, the heat-treated cell module shreds go through a three-part series where battery powder is a product after each section. Then, the cell shreds go through a process, where iron and copper are recovered for recycling. Particulate emissions from the screening and crushing machines are routed to a dust collector.

Finishing Product Lines for Cathode and Anode Active Materials

Cathode and anode active material (CAM) that does not need to be dried are transferred from the cutting machines into a separate finishing product line that consists of a three-part series where battery powder is a product after each section. Then the CAM shreds go through a process where iron and copper are recovered for recycling. Particulate emissions from the screening and crushing machines are routed to a dust collector.

Equipment List

Table 1: Equipment List for SungEel Recycling Park Georgia, LLC

Emission Unit ID No.	Equipment Description	Air Pollution Control Device ID No.	Air Pollution Control/Recovery Device Description[1]	Stack ID No.
WD1	Water Discharging Zone No. 1	AC3	Activated Carbon Tower	EM-1
RTD1	Rotary Type Dryer No. 1	CYC1 CON1 ESP1 AC1 WS1	Cyclone Condenser Electrostatic Precipitator Activated Carbon Tower Wet Scrubber	EM-2A
RTD2	Rotary Type Dryer No. 2	CYC2 CON2 ESP2 AC2 WS2	Cyclone Condenser Electrostatic Precipitator Activated Carbon Tower Wet Scrubber	EM-2B
CPF1	Cell Module Finishing Product Line No. 1	DC1	Dust Collector	EM-3A
CPF2	Cell Module Finishing Product Line No. 2	DC2	Dust Collector	EM-3B
CAM1	CAM Finishing Product Line No. 1	DC3	Dust Collector	EM-4A
CAM2	CAM Finishing Product Line No. 2	DC4	Dust Collector	EM-4B

[1] Note that the dust collectors are control equipment, as are the activated carbon towers and wet scrubbers. The cyclones, condensers, and electrostatic precipitators are recovery equipment since they do not emit pollutants into the ambient air.

Emissions Summary

Facility-Wide Emissions
(ton/yr)

Pollutant	Potential Emissions			Actual Emissions		
	Before Mod.	After Mod.	Emissions Change	Before Mod.	After Mod.	Emissions Change
PM		<100			1.25E-03	1.25E-03
PM_{10}		<100			1.25E-03	1.25E-03
$PM_{2.5}$		<100			5.57E-04	5.57E-04
NOx						
SO_2						
CO						
VOC		<100			2.34	2.34
Max. Individual HAP (H_2SO_4)		0.42	0.42		0.42	0.42
Total HAP		~0.42	~0.42		~0.42	~0.42
Total GHG (if applicable)						

Regulatory Applicability

Water Discharge Zone No. 1 (Emission Unit ID No. WD1)

This unit receives the pre-discharged lithium-ion material in sealed, dedicated water discharged totes. The water from the water discharged totes will be dispensed into a sump and then pumped into a holding tank for monthly disposal off site. Any vapors from this area will be routed through a duct to an activated carbon tower with Air Pollution Control Device ID No. AC3 (APCD ID No. AC3) which has an 80 percent removal efficiency for fluorine, Volatile Organic Compounds (VOC), formaldehyde, phenol, and benzene.

The facility has asked that this emission unit be exempted from permitting on account of the low VOC and HAP emission rates of 0.000153 ton/yr for each pollutant. The Division concurs and will exempt this emission unit from the permit.

Rotary Type Dryer and Cooler Nos. 1 and 2 (Emission Unit ID Nos. RTD1, RTD2)

Emission unit RTD1 is identical to RTD2. The crushed lithium-ion cell material is heated in an electric-powered rotary-type dryer and cooled in a rotary-type cooler. Air flow from the dryer is directed to the multi-stage atmospheric recovery system consisting of a cyclone, a condenser, an electrostatic precipitator (ESP), an activated carbon tower, and a wet scrubber. The cyclones (APCD ID Nos. CYC1 and CYC2) have a control efficiency for particulate matter (PM, PM_{10}, and $PM_{2.5}$) of 60 percent. The condensers (APCD ID Nos. CON1 and CON2) have a control efficiency for VOC of 70 percent. The ESPs (APCD ID Nos. ESP1 and ESP2) have a control efficiency for particulate matter (PM, PM_{10}, and $PM_{2.5}$) of 99 percent. The activated carbon towers (APCD ID Nos. AC1, AC2, and AC3) have a control efficiency for VOC and

fluoride of 80 percent. The wet scrubbers (APCD ID Nos. WS1 and WS2) have a control efficiency for particulate matter (PM, PM_{10}, and $PM_{2.5}$) and VOC of 70 percent.

Note that none of the control/recovery equipment for either RTD1 or RTD2 exhaust to the atmosphere with the exception of the wet scrubber. Therefore, cyclone, condenser, and ESP are inherently process or recovery equipment – for this process, each equipment would have been installed if no air quality regulations were in place. The activated carbon tower is a control equipment because it cleans the flue gas prior to entry to the wet scrubber.

This unit is subject to the following rules:

Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions"
Georgia Rule 391-3-1-.02(2)(e) – "Particulate Emission from Manufacturing Processes"

Compliance with each rule is likely due to the series of recovery and wet scrubber control equipment utilized.

Cell Module Finishing Product Lines (Emission Unit ID Nos. CPF1 and CPF2)

Emission unit CPF1 is identical to CPF2. After the RT dryer and cooler, the heat-treated cell module shreds go through a three-part series of machines where battery powder is a product after each section. Iron and copper are also recovered in this unit for recycling. Particulate emissions from the screening and crushing machines are routed to a dust collector. The dust collectors (APCD ID Nos. DC1 and DC2) each has a control efficiency for particulate matter (PM, PM_{10}, and $PM_{2.5}$) of 99.99 percent.

This unit is subject to the following rules:
Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions"
Georgia Rule 391-3-1-.02(2)(e) – "Particulate Emission from Manufacturing Processes"

Compliance with each rule is likely due to the dust collector control equipment utilized.

CAM Finishing Product Lines (Emission Unit ID Nos. CAM1 and CAM2)

Emission unit CAM1 is identical to CAM2. Cathode and anode active material (CAM) that does not need to be dried are transferred from the cutting machines into a separate finishing product line where battery powder is a product. Iron and copper are also recovered in this unit for recycling. Particulate emissions from the screening and crushing machines are routed to a dust collector. The dust collectors (APCD ID Nos. DC3 and DC4) each has a control efficiency for particulate matter (PM, PM_{10}, and $PM_{2.5}$) of 99.99 percent.

This unit is subject to the following rules:

Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions"
Georgia Rule 391-3-1-.02(2)(e) – "Particulate Emission from Manufacturing Processes"

Compliance with each rule is likely due to the dust collector utilized control equipment utilized.

Permit Conditions

Pursuant to the avoidance of Part 70 regulations, Condition 2.1 limits emissions of PM, PM_{10}, $PM_{2.5}$, and VOC to less than 100 tons per year.

Pursuant to the avoidance of Part 70 regulations, Condition 2.2 limits emissions of any single HAP and emissions of combined HAPs to less than 10 and 25 ton/yr, respectively.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 2.3 requires that the control and recovery equipment be in operation whenever the emission unit is in operation. This is necessary to achieve the emission limits.

Pursuant to Rule (b), Condition 2.4 limits visible emissions from each emission unit to less than 40 percent opacity.

Pursuant to Rule (e). Condition 2.5 limits particulate emissions from each emission unit to less than the Rule (e) limit.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 2.6 requires that the discharge into the atmosphere from each emission unit not contain any pollutants in excess of the amounts indicated in permit application 28891.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 4.1 requires that the Permittee perform routine maintenance on air pollution control equipment and to maintain such records in a permanent form suitable and available for inspection for a period of at least five years.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 4.2 requires that the Permittee maintain an inventory of filter bags such that an adequate supply is available to replace any defective bag in the dust collectors.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 4.3 requires the Permittee to maintain the scrubbant liquid flow rate, the pressure drop, and the pH parameters after conducting the performance tests.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 5.1 requires the Permittee to install, calibrate, maintain, and operate monitoring devices for the parameters indicated at the frequency specified for each parameter.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 5.2 requires the Permittee to perform a weekly visible emissions check on the exhaust stacks of the dust collectors as indicated in the condition.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 5.3 requires the Permittee to develop and implement within 60 days after the startup of the facility a Preventive Maintenance Program for the dust collectors as indicated in the condition.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 6.2 indicates that a repeat performance test may be required if production rates increase above the rates at which the acceptable performance test were conducted previously.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 6.3 requires that performance and compliance tests be conducted using the methods indicated in the condition.

Pursuant to Rules 391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c), Condition 6.4 requires that performance tests be conducted as stated in the condition.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 6.5 requires the Permittee to conduct repeat performance testing every two years.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 7.2 requires the Permittee to maintain the monthly and the 12-month consecutive period records indicated in the condition.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 7.3 requires the Permittee to maintain records of the occurrence and duration of any startup, shutdown, or malfunction and to retain such records for a period of five years from the date of measurement.

Pursuant to Rule 391-3-1-.02(6)(b)1, Condition 7.4 requires the Permittee to maintain a file of all measurements, record the information in a permanent form, and retain such records for a period of five years from the date of measurement.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 7.5 requires the Permittee upon startup to develop, implement, and submit a calculation protocol for calculating the total amount of each pollutant emitted from the entire facility on a monthly basis.

Pursuant to Avoidance of 40 CFR Part 70, Area Source Classification Under 40 CFR 63, and 391-3-1-.02(6)(b)1, Condition 7.6 requires the Permittee to calculate the monthly pollutant emissions and the 12-month consecutive period emissions to ensure that the facility is under the Title V emissions threshold.

Pursuant to Rule 391-3-1-.03(2)(c), Condition 7.7 requires the Permittee to submit a written report of reportable incidences during each semi-annual period as indicated in the condition.

Toxic Impact Assessment

Each toxic air pollutant (TAP) – Cadmium compounds, Chromium compounds, Chromium (VI), Nickel Compounds, and Sulfuric acid emission rate is higher than the minimum emission rate (MER) for the TAP as indicated by the table below.

SungEel Recycling Park Georgia, LLC
Proposed Lithium-Ion Battery Recycling Facility in Georgia [32 Hayes-Wilbanks Road, Toccoa, Georgia 30577]
Toxic Air Pollutants Modeling Determination

Pollutant	WD1 Uncontrolled PTE		RKD1 Controlled PTE		RKD2 Controlled PTE		CPF1 Controlled PTE		CPF2 Controlled PTE		CAM1 Controlled PTE		CAM2 Controlled PTE		HAP[1]	TAP	TOTAL			TAP Minimum Emission Rate	Pollutant Requires Modeling?
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	Y/N	Y/N	(lb/hr)	(lb/yr)	(ton/yr)	(lb/yr)	(Y/N)
Ammonia (TAP)	NA	NA	3.95E-02	1.73E-01	3.95E-02	1.73E-01	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	0.08	691.60	0.35	24300.00	N
Benzene (HAP/TAP)	4.40E-09	9.65E-04	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	Y	Y	4.40E-09	3.86E-05	9.65E-04	31.60	N
Cadmium Compounds (HAP/TAP)	NA	NA	1.79E-04	7.82E-04	1.79E-04	7.82E-04	NA	NA	NA	NA	NA	NA	NA	NA	Y	Y	3.57E-04	3.13	0.00	1.35	Y
Carbon Black (TAP)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.37E-10	1.04E-09	2.37E-10	1.04E-09	N	Y	4.74E-10	4.15E-06	2.08E-09	404.00	N
Chromium Compounds (HAP/TAP)	NA	NA	7.95E-06	3.48E-05	7.95E-06	3.48E-05	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	1.59E-05	0.139	6.96E-05	0.02	Y
Chromium (VI) Compounds (HAP/TAP)	NA	NA	7.95E-06	3.48E-05	7.95E-06	3.48E-05	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	1.59E-05	0.139	6.96E-05	0.02	Y
Cobalt (HAP/TAP)	NA	NA	NA	NA	NA	NA	3.48E-09	1.52E-08	3.48E-09	1.52E-08	3.90E-09	1.71E-08	3.90E-09	1.71E-08	Y	Y	1.48E-08	1.29E-04	6.47E-08	11.70	N
Copper (TAP)	2.20E-04	9.65E-04	1.44E-03	6.31E-03	1.44E-03	6.31E-03	3.25E-09	1.42E-08	3.25E-09	1.42E-08	4.34E-09	1.90E-08	4.34E-09	1.90E-08	N	Y	3.10E-03	27.17	1.26E-02	117.00	N
Fluoride Compounds (TAP)	NA	NA	6.27E-04	2.75E-03	6.27E-04	2.75E-03	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	1.25E-03	10.98	5.49E-03	290.00	N
Fluorine (TAP)	2.66E-09	1.16E-08	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	2.66E-09	2.33E-05	1.16E-08	23.20	N
Formaldehyde (HAP/TAP)	6.83E-06	2.99E-05	7.44E-04	3.26E-03	7.44E-04	3.26E-03	NA	NA	NA	NA	NA	NA	NA	NA	Y	Y	1.49E-03	13.09	0.01	267.00	N
Graphite (TAP)	NA	NA	NA	NA	NA	NA	5.80E-09	2.54E-08	5.80E-09	2.54E-08	2.37E-10	1.04E-09	2.37E-10	1.04E-09	N	Y	1.21E-08	1.06E-04	5.29E-08	290.00	N
Hydrogen Chloride (HAP/TAP)	NA	NA	1.32E-02	5.76E-02	1.32E-02	5.76E-02	NA	NA	NA	NA	NA	NA	NA	NA	Y	Y	0.03	230.53	0.12	4,870	N
Manganese (HAP/TAP)	NA	NA	NA	NA	NA	NA	6.96E-10	3.05E-09	6.96E-10	3.05E-09	3.03E-09	1.33E-08	3.03E-09	1.33E-08	Y	Y	7.46E-09	6.53E-05	3.27E-08	12.20	N
Nickel Compounds (HAP/TAP)	NA	NA	4.32E-03	1.89E-02	4.32E-03	1.89E-02	9.27E-10	4.06E-09	9.27E-10	4.06E-09	3.24E-09	1.42E-08	3.24E-09	1.42E-08	Y	Y	8.64E-03	75.71	0.04	38.60	Y
Phenol (HAP/TAP)	1.34E-07	5.86E-07	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	Y	Y	1.34E-07	1.17E-03	5.86E-07	2200.00	N
Sulfuric Acid (TAP)	NA	NA	0.05	0.21	0.05	0.21	NA	NA	NA	NA	NA	NA	NA	NA	N	Y	0.10	848.63	0.42	117.00	Y

NA = Not Applicable

TOTAL HAPs (TPY)	0.16

[1]HAP Thresholds - Potential Emissions of 10 tons per year for individual HAPs and 25 TPY for combined HAPs

Therefore, each TAP (Cadmium, Chromium compounds, Chromium (VI), Nickel, and Sulfuric acid) was modeled to determine whether the maximum ground level concentration (MGLC) exceeded the acceptable ambient concentration (AAC) for that TAP. Below are the tables summarizing the modeling results.

	Controlled Cadmium Compounds CAS No. 7440439				
Emission Source	**Controlled Emission Rate (lb/hr)**	**Controlled Emission Rate (g/s)**	**Maximum Modeled Concentration ($\mu g/m^3$)**	**Annual Acceptable Ambient Concentration ($\mu g/m^3$)**	**In Compliance? (yes/no)**
SC Regulation No. 62.5, Standard No. 8					
Water Discharging Zone EM-1	0	0			
RKD1 - Atmospheric Protection Facility EM-2A	1.79E-04	0.00002			
RKD1 - Atmospheric Protection Facility EM-2B	1.79E-04	0.00002			
Cell Product Finishing 1 Dust Collector EM-3A	0	0			
Cell Product Finishing 1 Dust Collector EM-3B	0	0			
CAM Product Finishing 1 Dust Collector EM-4A	0	0			
CAM Product Finishing 1 Dust Collector EM-4B	0	0			
TOTAL	3.57E-04	4.50E-05	1.22E-04	5.56E-03	yes

	Controlled Chromium Compounds CAS No. 7440473				
Emission Source	**Controlled Emission Rate (lb/hr)**	**Controlled Emission Rate (g/s)**	**Modeled Concentration ($\mu g/m^3$)**	**Annual Acceptable Ambient Concentration ($\mu g/m^3$)**	**In Compliance? (yes/no)**
Per Georgia Toxics Impact Assessment Guidelines					
Water Discharging Zone EM-1	0	0.00			
RKD1 - Atmospheric Protection Facility EM-2A	7.95E-06	1.00E-06			
RKD1 - Atmospheric Protection Facility EM-2B	7.95E-06	1.00E-06			
Cell Product Finishing 1 Dust Collector EM-3A	0	0.00			
Cell Product Finishing 1 Dust Collector EM-3B	0	0.00			
CAM Product Finishing 1 Dust Collector EM-4A	0	0.00			
CAM Product Finishing 1 Dust Collector EM-4B	0	0.00			
TOTAL	1.59E-05	2.00E-06	5.42E-06	8.30E-05	yes

	Controlled Chromium (VI) Compounds CAS No. 7440473				
Emission Source	**Controlled Emission Rate (lb/hr)**	**Controlled Emission Rate (g/s)**	**Maximum Modeled Concentration ($\mu g/m^3$)**	**Annual Acceptable Ambient Concentration ($\mu g/m^3$)**	**In Compliance? (yes/no)**
Per Georgia Toxics Impact Assessment Guidelines					
Water Discharging Zone EM-1	0.00	0.00			
RKD1 - Atmospheric Protection Facility EM-2A	7.95E-06	1.00E-06			
RKD1 - Atmospheric Protection Facility EM-2B	7.95E-06	1.00E-06			
Cell Product Finishing 1 Dust Collector EM-3A	0.00	0.00			
Cell Product Finishing 1 Dust Collector EM-3B	0.00	0.00			
CAM Product Finishing 1 Dust Collector EM-4A	0.0000	0.00			
CAM Product Finishing 1 Dust Collector EM-4B	0.0000	0.00			
TOTAL	1.59E-05	2.00E-06	5.42E-06	8.30E-05	yes

	Controlled Nickel CAS No. 7440020				
Emission Source	**Controlled Emission Rate (lb/hr)**	**Controlled Emission Rate (g/s)**	**Maximum Modeled Concentration ($\mu g/m^3$)**	**24-hr Acceptable Ambient Concentration ($\mu g/m^3$)**	**In Compliance? (yes/no)**
SC Regulation No. 62.5, Standard No. 8					
Water Discharging Zone EM-1	0.0	0.0			
RKD1 - Atmospheric Protection Facility EM-2A	4.32E-03	0.00054			
RKD1 - Atmospheric Protection Facility EM-2B	4.32E-03	0.00054			
Cell Product Finishing 1 Dust Collector EM-3A	9.27E-10	1.17E-10			
Cell Product Finishing 1 Dust Collector EM-3B	9.27E-10	1.17E-10			
CAM Product Finishing 1 Dust Collector EM-4A	3.24E-09	4.08E-10			
CAM Product Finishing 1 Dust Collector EM-4B	3.24E-09	4.08E-10			
TOTAL	8.64E-03	1.09E-03	2.36E-02	7.94E-01	yes

	Controlled Sulfuric Acid CAS No. 7664939				
Emission Source	**Controlled Emission Rate (lb/hr)**	**Controlled Emission Rate (g/s)**	**Maximum Modeled Concentration (mg/m^3)**	**24-hr Acceptable Ambient Concentration ($\mu g/m^3$)**	**In Compliance? (yes/no)**
Per Georgia Toxics Impact Assessment Guidelines					
Water Discharging Zone EM-1	0.0	0.00			
RKD1 - Atmospheric Protection Facility EM-2A	0.048	0.0061			
RKD1 - Atmospheric Protection Facility EM-2B	0.048	0.0061			
Cell Product Finishing 1 Dust Collector EM-3A	0.00	0.00			
Cell Product Finishing 1 Dust Collector EM-3B	0.00	0.00			
CAM Product Finishing 1 Dust Collector EM-4A	0.00	0.00			
CAM Product Finishing 1 Dust Collector EM-4B	0.00	0.00			
TOTAL	9.69E-02	1.22E-02	2.65E-01	2.40E+00	yes

The tables show that each of the receptor MGLC is less than the corresponding AAC. Therefore, SungEel Recycling Park Georgia, LLC will not have an adverse toxic impact on the area and has satisfied the Georgia Air Toxic Guideline.

Summary & Recommendations

It is my recommendation to issue the attached Air Quality Permit No. 5093-257-0060-S-01-0 with conditions which will reasonably ensure that the source is able to demonstrate compliance with our Rules. The public advisory for this source expired on July 7, 2023 and there were six public comments. The draft permit will have a 30-day notice period. The public will have the opportunity to provide additional comments on the draft permit during that time. The facility will be a synthetic minor source with regard to the Title V rules. The facility is located in the Northeast District (Athens) and assigned to the Compliance Program for inspection purposes.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//