

NOTICE OF THE OPPORTUNITY FOR PUBLIC COMMENT

GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION AIR PROTECTION BRANCH

STATE OF GEORGIA
COUNTY OF DECATUR

NOTICE OF PREVENTION OF SIGNIFICANT DETERIORATION (PSD) PRELIMINARY DETERMINATION AND DRAFT PSD PERMIT

To All Interested Parties:

The Georgia Environmental Protection Division (EPD) announces its intent to issue to Anovion Technologies LLC, Prevention of Significant Deterioration (PSD) Permit No. 3624-087-0061-P-01-0 for the construction and operation of an anode materials facility producing lithium-ion battery grade synthetic graphite powder product from petroleum coke. The facility is located at 1600 Pondtown Road, Bainbridge, Georgia.

The draft permit, PSD Preliminary Determination, and all information used to develop these documents are available for review. This includes the application and all other relevant materials available to the permitting authority. This information is available for review at the office of the Air Protection Branch, 4244 International Parkway, Atlanta Tradeport - Suite 120, Atlanta, Georgia 30354. Electronic files of the application, draft PSD permit, PSD Preliminary Determination will be available through our internet site <http://epd.georgia.gov/air/psd112gnaa-nsrcp-permits-database>. (Please note that the Internet is generally accessible from most public libraries in Georgia.)

If copies are desired, a copying machine for public use is provided by EPD at the Atlanta Air Protection Branch office. There will be a copying charge of \$0.10 per page. Copies will be made on a first-come, first-served basis. Files are available for review and copying 8:30 a.m. to 4:00 p.m., Monday - Friday, excluding holidays.

You are hereby notified of the opportunity to submit written public comments concerning the draft PSD Permit and the Preliminary Determination concerning this new facility. The Preliminary Determination is a summary of the technical review of the application and contains a copy of the Company's application along with supporting documents. Persons wishing to comment on the draft PSD Permit and Preliminary Determination are invited to submit their comments, in writing, to EPD at the Atlanta address above, or via email [preferred] to epdcomments@dnr.ga.gov (email comments must include the facility name and "Air Permit" in subject line) no later than 30 days after the date of publication in *The Post Searchlight*. All comments postmarked on or prior to that date will be considered by the Division in making its final decision on the permit.

The Division has concluded that Anovion Technologies LLC's application should be approved and that a permit should be granted. This conclusion is based upon evidence that the proposed project will comply with the Division's Rules and Regulations for Air Quality Control, Chapter 391-3-1; that the emissions from the source will not cause or add to a violation of any applicable National Ambient Air Quality Standard (NAAQS) or PSD increment; and will comply with the Federal PSD regulations, 40 CFR 52.21, including the use of Best Available Control Technology (BACT) for regulated pollutants.

Emission increases of particulate matter (total suspended particulate, PM₁₀, and PM_{2.5}), Volatile Organic Compounds (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NO_x), and Sulfur Dioxide (SO₂) from the proposed project exceed the PSD significant emission rates (SER) established by the PSD regulation 40 CFR52.21 and thus trigger PSD major source review. Projected potential emissions are as follows: filterable PM: 58.43 tons per year (tpy), PM₁₀: 53.60 tpy, PM_{2.5}: 14.16 tpy, NO_x: 44.57 tpy, CO: 2,930.21 tpy, VOC: 55.55 tpy, and SO₂: 208.14 tpy.

The PSD regulations allow specific maximum incremental increases in ambient concentrations of particulate matter (PM₁₀ and PM_{2.5}) sulfur dioxide (SO₂), and nitrogen oxides (NO₂). The EPD has determined that the maximum predicted impacts of these pollutants due to the proposed project will consume 7 percent of the annual NO₂ PSD increment, 35 percent of the annual PM₁₀ PSD increment, 80 percent of the 24-hour PM₁₀ PSD increment, 45 percent of the annual PM_{2.5} increment, 83 percent of the 24-hour PM_{2.5} PSD increment, 44 percent of the annual SO₂ increment, 56 percent of the 24-hour SO₂ PSD increment, and 24 percent of the 3-hour SO₂ increment. Thus, EPD has concluded that the facility will not adversely affect the air quality (i.e., exceed the allowable incremental increases in ambient concentration of SO₂, PM₁₀, PM_{2.5}, NO₂).

Further analysis and modeling demonstrated that CO, NO₂, PM₁₀, and PM_{2.5} emissions (including secondary formation) will not cause or contribute to the violation of their respective NAAQS or PSD Increment. An ozone ambient impact analysis shows no adverse impacts from the proposed project NO_x and VOC emissions.

With regard to the Class I Areas (Bradwell Bay, Saint Marks National Wildlife Refuge, and Okefenokee Wilderness), the EPD has determined that the allowable PM_{2.5}, PM₁₀, SO₂, NO₂ emissions from the facility will consume at the most 7 percent (NO₂ annual), 53 percent (PM₁₀ 24-hour), 4 percent (PM₁₀ annual), 76 percent (PM_{2.5} 24-hour), 11 percent (PM_{2.5} annual), and 37 percent (SO₂ annual) of the PSD Class I significant impact levels. For SO₂ 3-hour and 24-hour, the values needed to be evaluated using CALPUFF (further refined modeling); the impact at Bradwell Bay is 42 percent (SO₂ 3-hour) and 78 percent (SO₂ 24-hour) of the PSD Class I significant impact levels. With this in mind, EPD has concluded that the facility will not adversely affect the air quality (i.e., exceed the allowable Class II and Class I incremental increase in ambient concentrations of SO₂, PM₁₀, PM_{2.5}, NO₂).

The Division has determined that these emissions will not cause an adverse impact on ambient air quality, and the air quality levels should pose no significant health risk around the new facility.

Any requests for a public hearing must be made in writing (including emails) within the same 30-day public comment period. Such requests should specify in detail the portion of the Air Quality Control Rules which the individual believes may not have been adequately reviewed. A public hearing may be held if the Director of the EPD finds that such a hearing would assist the EPD in a proper review of the facility's capability to comply with the requirements of Federal and State Air Quality Control regulations. State laws specify that a permit shall be issued on evidence satisfactory to the Director of compliance with applicable State and Federal regulations and requirements.

After the public comment period has expired, the EPD will consider all comments, make any necessary changes, and issue a Final Determination relative to Anovion Technologies LLC, including a final PSD Construction and Operating Permit. Copies of the final PSD Construction and Operating Permit, Final Determination, comments received, EPD's responses to comments, and any other relevant information will then be made available for public review during normal business hours at the office of the Air Protection Branch, as well as at the Internet addresses given above.

For additional information, contact Steven Allison, Program Manager, Stationary Source Permitting Program, at the Atlanta address, at Steven.Allison@dnr.ga.gov, or by phone at 404/363-7000. Please refer to this notice when requesting information.