



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

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: Tremco CPG Inc.

Facility Address: 4551 Cargo Drive
Columbus, Georgia 31907 (Muscogee County)

Mailing Address: 4551 Cargo Drive
Columbus, Georgia 31907

Facility AIRS Number: 04-13-215-00183

is issued a Permit for the following:

Operation of an expanded polystyrene concrete form manufacturing 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. 28992 dated August 24, 2023; 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 5 pages.



Jeffrey W. Cown, Director
Environmental Protection Division

**State of Georgia
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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 entire facility, volatile organic compounds (VOC) in an amount equal to or exceeding 99 tons during any twelve consecutive month period.
[Avoidance of 40 CFR Part 70]
- 2.2 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 Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units” for the operation of Boilers B1 and B41.
[40 CFR 60 Subpart A and 40 CFR 60 Subpart Dc]

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2.3 The Permittee shall not cause, let, suffer, permit, or allow emissions from all process equipment which exhibits visible emissions, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)]

2.4 The Permittee shall not cause, let, suffer, permit, or allow any emissions from any fuel burning equipment which:

a. For fuel burning equipment less than 10 MMBtu/hr. heat input — contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

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

b. For fuel burning equipment greater than or equal to 10 MMBtu/hr. heat input and equal to or less than 250 MMBtu/hr. heat input — contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from the equation noted below:

[391-3-1-.02(2)(d)2.(ii)]

$$P = 0.5(10/R)^{0.5}$$

Where P equals the allowable PM emission rate in pounds per million BTU and R equals the heat input in millions BTU per hour.

c. For all fuel-burning equipment— exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.

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

2.5 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the following rates:

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

$E = 4.1 P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55P^{0.11} - 40$, for process input weight rate in excess of 30 tons per hour.

Where E = emission rate in pounds per hour, and

P = process input weight rate in tons per hour.

2.6 The Permittee shall not burn any fuel other than natural gas in the fuel burning equipment, unless otherwise specified by the Division.

[391-3-1-.03(2)(c); 391-3-1-.02(2)(g)2. (subsumed); and avoidance of 40 CFR 63 Subpart JJJJJJ]

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3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

4. Process & Control Equipment

Not applicable.

5. Monitoring

- 5.1 Any monitoring system or device installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1.]

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.

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- 6.2 The Permittee shall conduct sample testing to determine the average amount of pentane contained in the raw expanded polystyrene (EPS) beads and retained in the final products manufactured at the facility and after 30 days of storage if zero percent (0%) pentane retention is not assumed when calculating VOC emissions from the equation stated in Condition 7.4. The Permittee shall collect and analyze representative samples of the raw EPS beads used at the facility and products manufactured at the facility. The sampling methods and analyses shall be performed and conducted using methods and procedures approved by the Division. The results of the analyses shall be submitted to the Division within 30 days of the completion of testing.
[391-3-1-.03(2)(c)]

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain monthly usage records of all materials used at the facility that contain VOC. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the volatile content of any material disposed as waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1]
- 7.2 The Permittee shall use the monthly usage records required in Condition 7.1 to calculate the total monthly VOC emissions from the entire facility (except fuel burning sources). All variables used in the calculation, including any Division approved emission factors, shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the facility-wide VOC emissions equal to or exceed 8.25 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1. The Permittee shall maintain these records on site at all times in a format suitable and available for inspection by or submittal to the Division on request.
[391-3-1-.02(6)(b)1]
- 7.3 The Permittee shall use the calculations required in Condition 7.2 to determine the twelve-month rolling total emissions of VOC from the entire facility (except fuel burning sources) for each calendar month. The Permittee shall notify the Division in writing if the VOC emissions from the entire facility equal or exceed 99 tons during any consecutive twelve-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.1. The Permittee shall maintain these records on site at all times in a format suitable and available for inspection by or submittal to the Division on request.
[391-3-1-.02(6)(b)1]

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- 7.4 For the purposes of the calculations required in Condition 7.2 the Permittee shall calculate the VOC emissions as follows:

VOC Emissions

$$\text{VOC}_{\text{Emitted}} = (\text{Material Throughput (lb)}) * [(\text{VOC Content Weight \%}) - (\text{VOC \% of Final Product})]$$

Unless Division-Approved sampling on the final product is conducted, the VOC % of Final Product in the above equation shall be assumed to be zero percent (0%).

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

- 7.5 The Permittee shall record and maintain records of the amount of natural gas combusted in Boilers B1 and B41 during each calendar month. In lieu of recording the quantity of natural gas consumed by Boilers B1 and B41, the Permittee may maintain records of the total amounts of natural gas delivered to the facility each calendar month.

[40 CFR 60.42c(g)(2) and 391-3-1-.02(6)(b)1]

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 Georgia Air Quality Permit No. 3086-215-0183-S-02-0 and Georgia Air Quality Permit Amendment No. 3086-215-0183-S-02-1 are hereby revoked in their entirety.
- 8.3 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."