# PERMIT NO. 2499-299-0053-V-03-0 ISSUANCE DATE:



### **ENVIRONMENTAL PROTECTION DIVISION**

# Air Quality - Part 70 Operating Permit

Facility Name: Georgia Biomass, LLC

**Facility Address:** 3390 Industrial Boulevard

Waycross, Georgia 31503 (Ware County)

Mailing Address: 3390 Industrial Boulevard

Waycross, Georgia 31503

Parent/Holding Company: Georgia Biomass, LLC

**Facility AIRS Number:** 04-13-299-00053

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

## The operation of a wood pellet manufacturing facility.

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. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

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, for any misrepresentation made in Title V Application TV-45813 signed on June 18, 2018, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of 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 **47** pages.



**DRAFT** 

Richard E. Dunn, Director

Environmental Protection Division

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#### PART 1.0 FACILITY DESCRIPTION

#### 1.1 Site Determination

There is no site determination issue pertaining to the Georgia Biomass Pelletmill. Georgia Biomass is currently operating a wood pellet production facility in Waycross, Georgia under operating permit No. 2499-299-0053-V-02-0 and three permit amendments. The operations are categorized under Standard Industrial Classification (SIC) code 2499, *Wood Products – Not Elsewhere Classified*. The Waycross facility processes logs into fuel pellets, to produce a source of alternative renewable fuel for utility power boilers in Europe.

#### 1.2 Previous and/or Other Names

The facility has not been known by any other name other than Georgia Biomass, LLC.

#### 1.3 Overall Facility Process Description

Georgia Biomass operates a wood pellet facility located in Waycross, Georgia. The facility includes a wood fiber receiving and storage area, two direct-fired dryers, two hammermill lines with five hammermills in each line, five pelletmills and five pellet coolers and wood pellet loadout area. The Waycross facility processes logs into fuel pellets. Tree length pulpwood logs are received via trucks. The logs are stored to promote air drying. A log loader transfers the logs into a debarker drum. The bark is separated and used as fuel in the heat energy systems providing heat for drying the wood chips in the dryers. The debarked logs are chipped into small chips. Oversized chips are removed using a jet screen located downstream from the chipper and the chips stream is pneumatically conveyed to a cyclone to drop out the chips and control PM emissions from the chipping operation. The chips are fed into two direct-fired rotary dryers where in the moisture level in the chips is reduced from around 50% to 10%. Heat for the chip dryers is obtained from the two 193 MMBtu/hr bark fueled heat energy systems. The dried wood chips pass through 10 total hammermills in two hammermill lines, which further grind the wood chips into wood flakes before they are compressed into pellets on a rotating press roll (pelletizer/pelletmill). The pellets are cooled in five counter-flow pellet coolers before they are loaded into rail cars where they are transported to Savannah for storage prior to shipment via vessels to be used in utility power boilers in Europe.

The Waycross facility can produce up to 826,733 tpy of wood pellets.<sup>1</sup> The Waycross facility has the capacity to operate continuously (8,760 hr/yr).

<sup>1</sup> Production capacity design of 750,000 metric tons per year of wood pellets.

#### PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

#### 2.1 Facility Wide Emission Caps and Operating Limits

2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain Nitrogen Oxides (NOx), Carbon Monoxide (CO) or Volatile Organic Compounds (VOC) in excess of 249 tons during any twelve consecutive months.

[Avoidance of 40 CFR 52.21]

2.1.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any single hazardous air pollutant which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any twelve consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive months.

[Avoidance of Major Source MACT per 40 CFR 63]

#### 2.2 Facility Wide Federal Rule Standards

None applicable

#### 2.3 Facility Wide SIP Rule Standards

None applicable

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable

# PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1 Emission Units

	<b>Emission Units</b>	Specific Limitation	s/Requirements	Air Poll	lution Control Devices
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
LC01	Wood chip Screen	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(n)	3.4.1, 3.4.2, 3.4.4	CYC1	Cyclone
HES1	193 MMBtu/hr Heat Energy System 1	391-3-102(2)(d) 40 CFR 60 Subparts A & Db	2.1.1, 2.1.2, 3.2.1, 3.2.2, 3.2.3, 3.3.1, 3.3.4, 3.3.5, 3.3.10, 3.3.11, 3.3.12,	WE01 RTO1	Wet ESP Regenerative Thermal Oxidizer
HES2	193 MMBtu/hr Heat Energy System 2	40 CFR 63 Subparts A and 6J PSD avoidance	3.4.1, 3.4.5, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 5.2.1, 5.2.2, 5.2.3, 5.2.8, 5.2.7, 5.2.13, 5.2.14, 5.2.16, 5.2.17, 6.1.7b, 6.1.7c, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7	WE02 RTO2	Wet ESP Regenerative Thermal Oxidizer
DRY1	Rotary Drum Dryer 1	391-3-102(2)(e) PSD avoidance	2.1.1, 2.1.2, 3.2.1, 3.2.2, 3.2.3, 3.3.10, 3.4.2, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 5.2.1, 5.2.2, 5.2.3, 5.2.7,	WE01 RTO1	Wet ESP Regenerative Thermal Oxidizer
DRY2	Rotary Drum Dryer 2		5.2.8, 5.2.14, 5.2.16, 5.2.17, 6.1.7b, 6.1.7c, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.11, 6.2.12.	WE02 RTO2	Wet ESP Regenerative Thermal Oxidizer
DCS	Dry Chip Storage Silo	391-3-102(2)(b) 391-3-102(2)(e)	3.2.5, 3.4.1, 3.4.2, 5.2.4, 5.2.6, 5.2.8, 5.2.9, 5.2.13, 5.2.14 and 5.2.15	DCS1 RC01	Baghouse Regenerative Catalytic Oxidizer (West)
CE01	Conveying Equipment Aspiration System for Hammermill Lines	391-3-102(2)(b) 391-3-102(2)(e)	2.1.1, 2.1.2, 3.2.4, 3.2.5, 3.4.1, 3.4.2, 4.2.3, 5.2.2, 5.2.4, 5.2.6, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 5.2.13, 5.2.14, 5.2.19 and 6.1.7c.	CBH1 RCO1	Baghouse Regenerative Catalytic Oxidizer (West)
HML	Hammermill Lines 1 and 2 (10 Hammermills)	391-3-102(2)(b) 391-3-102(2)(e)	2.1.1, 2.1.2, 3.2.4, 3.2.5, 3.4.1, 3.4.2, 4.2.3, 4.2.4, 5.2.2, 5.2.4, 5.2.6, 5.1.3, 5.2.2a, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 5.2.14, 5.2.17, 5.2.18, 6.1.7c, 6.2.2, 6.2.3, 6.2.4, 6.2.5	HBH1 to HBH 10	Baghouses  Regenerative Catalytic Oxidizer (West)
FS	Fiber Storage Silo	391-3-102(2)(b) 391-3-102(2)(e)	3.2.5, 3.4.1, 3.4.2, 5.2.4, 5.2.6, 5.2.8, 5.2.9, 5.2.10. 5.2.11 and 5.2.12	CBH1 RCO1	Baghouse Regenerative Catalytic Oxidizer (West)
CE02	Conveying Equipment Aspiration System for Pelletmill/Pellet Cooler Lines	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(n)	2.1.1, 2.1.2, 3.2.4, 3.2.5, 3.4.1, 3.4.2, 4.2.3, 5.2.2, 5.2.4, 5.2.6, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 5.2.14, 5.2.19 and 6.1.7c.	CBH2 RCO2	Baghouse Regenerative Catalytic Oxidizer (East)

Emission Units		Specific Limitations/Requirements		<b>Air Pollution Control Devices</b>	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PML PCL	Pelletmill (5 Lines) Pellet Cooler (5 lines)	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(n)	2.1.1, 2.1.2, 3.2.4, 3.2.5, 3.4.1, 3.4.2, 4.2.3, 4.2.4, 5.1.3, 5.2.2a, 5.2.4, 5.2.6, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 5.2.14, 5.2.18, 5.2.19 6.1.7c, 6.2.2, 6.2.3, 6.2.4, 6.2.5	PBH1 to PBH5 RCO2	Baghouses  Regenerative Catalytic Oxidizer (East)
PA01	Pelletizing Area Vacuum System	391-3-102(2)(b) 391-3-102(2)(e)	3.4.1, 3.4.4, 5.2.4, 5.2.5, 5.2.6, 6.1.7c, 5.1.3	PAB1	Baghouse
RL	Railcar Loadouts (3)	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(n)	3.4.1, 3.4.2, 3.4.4	RCF1 to RCF3	Compact Filters
FP01	175 hp Fire Water Pump Engine – diesel fired	391-3-102(2)(b) 40 CFR 60 Subparts A and IIII 40 CFR 63 Subparts A and ZZZZ	3.3.2, 3.3.3, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.4.1	N/A	N/A
EG01	500 kW Diesel fired Emergency Generator - Dryers	391-3-102(2)(b) 40 CFR 60 Subparts A and IIII 40 CFR 63 Subparts A and ZZZZ	3.3.2, 3.3.3, 3.4.1, 6.1.7b, 6.2.9, 6.2.10, 8.27.1, 8.27.3	N/A	N/A
EG02	250 kW Diesel fired Emergency Generator - Pelletizing	391-3-102(2)(b) 40 CFR 60 Subparts A and IIII 40 CFR 63 Subparts A and ZZZZ	3.3.2, 3.3.3, 3.4.1, 6.1.7b, 6.2.9, 6.2.10, 8.27.1, 8.27.3	N/A	N/A

<sup>\*</sup> Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

# 3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from Heat Energy Systems (HES1 and HES2) and Dryers (DRY1 and DRY2), any emissions which contain Total Particulate Matter (TPM) (filterable+condensible) in excess of 0.047 pounds per million Btu heat input from each stack.

  [Avoidance of 40 CFR 52.21]
- 3.2.2 The Permittee shall operate and maintain the Wet ESP (WE01 and WE02) and the Regenerative Thermal Oxidizers (RTO1 and RTO2) during all periods in which the respective Heat Energy Systems (HES1 and HES2)/Dryers (DRY1 and DRY2) are in operation.

  [391-3-1-.03(2)(c)]
- 3.2.3 The combustion temperature of the Regenerative Thermal Oxidizers (RTO1 and RTO2) shall be at least 1500°F or the temperature approved by the Division based upon the most recent VOC performance test.

  [391-3-1-.03(2)(c)]
- 3.2.4 The Permittee shall operate and maintain the Regenerative Catalytic Oxidizers (RCO1 and RCO2) during all periods in which the Hammermill lines (HML), the Pelletmill lines (PML), the Pellet cooler lines (PCL) and the conveying equipment aspiration systems (CEO1 and CEO2) are in operation.

  [391-3-1-.03(2)(c)]

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3.2.5 The combustion temperature of the Regenerative Catalytic Oxidizers (RCO1 and RCO2) shall be at least 800°F or the temperature approved by the Division based upon the most recent VOC performance test.

[391-3-1-.03(2)(c)]

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#### 3.3 Equipment Federal Rule Standards

- 3.3.1 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 Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units," for operation of the Heat Energy Systems (HES1 and HES2).

  [40 CFR 60 Subpart A and Subpart Db]
- 3.3.2 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 IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines," for operation of the fire water pump engine (FP01) and the two emergency generator engines (EG01 and EG02).

  [40 CFR 60 Subparts A and IIII]
- 3.3.3 The Permittee shall comply with all applicable provisions of the National Emission Standard for Hazardous Air Pollutants (NESHAPs) 40 CFR 63 Subpart A and ZZZZ "NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)" for the operation of fire water pump engine (FP01) and the two emergency generator engines (EG01 and EG02).

  [40 CFR 63 Subparts A and ZZZZ]
- 3.3.4 The Permittee shall comply with all applicable provisions of the "National Emission Standards for Hazardous Air Pollutants" as found in 40 CFR 63 Subpart A, "General Provisions" and 40 CFR 63 Subpart JJJJJJ, "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial Commercial, and Institutional Boilers" for the operation of Heat Energy Systems (HES1 and HES2), including the following requirements:

[40 CFR 63 Subpart A and Subpart JJJJJJ and 40 CFR 63.11193]

- a. Conduct biennial performance tune-ups on Heat Energy Systems (HES1 and HES2) as required by 40 CFR 63.11223. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up for the purpose of demonstrating continuous compliance with the Boiler MACT requirements. The tune-up must be conducted as specified in Condition 5.2.11.
  - [40 CFR 63.11196(a)(1), 63.11214(b), 40 CFR 63.11223(a) and 40 CFR 63.11223(b)]
- 3.3.5 At all times, the Permittee shall operate and maintain the Heat Energy Systems (HES1 and HES2) and associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[40 CFR 63.11205(a)]

3.3.6 The Permittee shall not cause, let, suffer, permit or allow the emission of filterable Particulate Matter (PM) from the Heat Energy Systems (HES1 and HES2) and Dryers (DRY1 and DRY2) in amounts equal to or exceeding 0.03 pounds per million Btu heat input.

[40 CFR 60.43b(h)(1) and 391-3-1-.02(2)(d) subsumed]

- 3.3.7 The Permittee shall limit the fuel fired in the Heat Energy Systems (HES1 and HES2) to biomass only except during startup when natural gas is fired, in order to avoid having to calculate the annual capacity factor for the fuel fired in these sources.

  [40 CFR 60.49b(d)(2)]
- 3.3.8 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the Heat Energy Systems (HES1 and HES2), gases which exhibit opacity equal to or greater than 20 percent except for one six-minute period of not more than 27 percent opacity except during periods of startup, shutdown, and malfunction.

  [40 CFR 60.43b(g) and 391-3-1-.02(2)(d) (subsumed)]

#### 3.4 Equipment SIP Rule Standards

3.4.1 The Permittee shall not cause, let, suffer, permit or allow emissions from sources in the emission units table in Section 3.1 for which this rule is applicable, the opacity of which is equal to or greater than forty (40) percent except for the Heat Energy Systems (HES1 and HES2).

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

3.4.2 The Permittee shall not cause, let, permit, suffer or allow the rate of emissions from each manufacturing process including the Hammermill lines (HML), Pelletmill lines (PML), Pellet Cooler lines (PCL), Railcar Loadouts (RL) and other sources in the emission units table in Section 3.1 for which this rule is applicable, particulate matter in total quantities equal to or exceeding the allowable rate, calculated as follows:

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

 $E=4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour or  $E=55P^{0.11}$ - 40; for process input weight above 30 tons per hour

Where:

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

3.4.3 The Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include but are not limited to, the following:

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

a. Use 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,

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- 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;
- d. Covering, at all times when in motion, open bodied trucks that are transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 3.4.4 The opacity from any fugitive dust source shall not equal or exceed 20 percent. [391-3-1-.02(2)(n)]
- 3.4.5 The Permittee shall not burn fuel containing more than 3 percent sulfur by weight in the Heat Energy Systems (HES1 and HES2). [391-3-1-.02(2)(g)

# 3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None Applicable

#### PART 4.0 REQUIREMENTS FOR TESTING

#### **4.1** General Testing Requirements

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.

  [391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) 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.

  [391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance 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. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
  - a. Method 1 shall be used for the determination of sample point locations.
  - b. Method 2 shall be used for the determination of stack gas flow rate.
  - c. Method 3 or 3A shall be used for the determination of stack gas molecular weight.
  - d. Method 3B shall be used for the determination of emission rate correction factor or excess air, Method 3A may be used as an alternative.
  - e. Method 4 shall be used for the determination of stack gas moisture.
  - f. Method 5 for the determination of Particulate Matter emissions to demonstrate compliance with the Particulate Matter emission limit in Condition 3.3.6. The probe and filter temperature should be 320 + or 25 °F and minimum sample volumes must be 60 dscf.
  - g. Method 5 in conjunction with Method 202 shall be used to demonstrate compliance with the Particulate Matter emission limit in Condition 3.2.1.
  - h. Method 7E shall be used for the determination of NOx concentrations.
  - i. Method 9 and the procedures in Section 1.3 of the above referenced document shall be used to determine the opacity.
  - j. Method 10 shall be used for the determination of CO concentrations.

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- k. Method 19 shall be used when applicable; to convert particulate matter, carbon monoxide, and nitrogen oxides concentrations (i.e., grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to mass emission rates (i.e., lb/MM Btu, lb/hr).
- 1. EPA OTM-26 (Interim VOC Measurement Protocol for the Wood Products Industry July 2007) or "WPP1 VOC" (Wood Products Protocol 1 VOC) shall be used for the determination of VOC concentrations.
  - i. Method 25A shall be used for determination of VOC concentrations.
  - ii. NCASI 99.02 or Method 308 shall be used for the determination of methanol concentrations.
  - iii. NCASI 99.02 or 105.01 or Method 316 or NCASI 98.01 or shall be used for the determination of formaldehyde concentrations.
  - iv. NCASI 99.02 or SW 846 Method 0011 shall be used for the determination of acetaldehyde concentrations.
- m. Method 25 shall be used to determine the concentration of Volatile Organic Compounds, as carbon. For Method 25 measurements, a factor of 1.2 shall be used to convert the VOC (as carbon) to actual VOC. Method 25A may be used as an alternate method.
- n. Method 0011 from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA publication SW-846 shall be used to determine the formaldehyde concentration. The sampling time for each run shall be one hour. [EPA Method 0011 (sampling) and EPA Method 0011A (analysis) may be used for the determination of formaldehyde concentration [40 CFR 266, Appendix IX]. Alternatively, Method 316 or 320 in Appendix A to 40 CFR Part 63; OR NCASI Method CI/WP-98.01 OR NCASI Method IM/CAN/WP-99.02 OR NCASI Method ISS/FP-A105.01 may be used.
- o. Method 320 in Appendix A to 40 CFR Part 63; OR the NCASI Method IM/CAN/WP-99.01 (incorporated by reference, see § 63.14(f)) shall be used for determination of total Hazardous Air Pollutants (HAP).

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard. [391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

#### 4.2 Specific Testing Requirements

- 4.2.1 The Permittee shall conduct PM tests to show compliance with the PM limit in Condition 3.2.1 at 36-month intervals. The tests shall be conducted at the maximum anticipated production rate. Should the PM emissions for the Heat Energy Systems be fifty (50) percent or less of the emissions limit contained in Condition 3.2.1, the testing may be conducted at 24 month intervals until such time that an emissions test indicates an emission rate greater than 50 percent of that limit, at which time testing shall revert to 12 month intervals. If the results of the PM test exceed the factor currently being used in Condition 6.2.1, then the Permittee must immediately reestablish the factors using the method described in Condition 6.2.1 (using the new, higher emission factors starting on the test date). The Permittee shall submit a permit application within 180 days after testing, either requesting the higher emission factor or demonstrating that the emission factor derived is not representative of normal emissions. During the performance testing, the Permittee shall record the amount of product dried in the dryers and establish representative pressure drop range on hammermill baghouses. Performance testing shall be conducted with the equipment operating under normal conditions. [391-3-1-.02(6)(b)1(i)]
- 4.2.2 The Permittee shall conduct NOx and CO tests on the RTO exit stack at 36-month intervals. The tests shall be conducted at the maximum anticipated drying rate and pellet production rate. If the results of either the NOx or CO test exceed the factor currently being used in Condition 6.2.1, then the Permittee must immediately reestablish the factors using the method described in Condition 6.2.1 (using the new, higher emission factors starting on the test date). The Permittee shall submit a permit application within 180 days after testing, either requesting the higher emission factor or demonstrating that the emission factor derived is not representative of normal emissions. The performance test must be conducted simultaneously each time a test is required for one of these pollutants.

  [391-3-1-.02(6)(b)1(i)]
- 4.2.3 The Permittee shall conduct VOC, formaldehyde, acetaldehyde, and methanol tests on the RTO and RCO exit stacks using EPA OTM-26 test method. The next performance test shall be conducted before May 24, 2022. Subsequent performance tests shall be conducted at 36 month intervals at the maximum anticipated production rate. The performance test must be conducted simultaneously each time a test is required for one of these pollutants. During the performance tests the Permittee shall continuously measure and record the combustion zone temperatures for the RTOs and RCOs. These measurements shall be used to establish the minimum temperature at which the RTOs and RCOs must operate so that compliance with the VOC emission limit of Condition 2.1.1 can be assured.

The Permittee shall submit a permit application within 180 days after testing, either requesting the higher emission factor or demonstrating that the emission factor derived is not representative of normal emissions. The Permittee shall submit the temperature measurements recorded during the testing and the temperatures established to the Division for approval.

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

During the performance tests, the Permittee shall, using the monitoring systems required by Condition 5.2.2, verify the control device is operating within the appropriate operating limits for the following control device parameters:

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

- a. the total secondary power of each wet ESP calculated from the secondary voltage and secondary current.
- b. the minimum combustion temperature of the RTOs and RCOs.

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#### PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

#### **5.1** General Monitoring Requirements

5.1.1 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.

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

- 5.1.2 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division and shall be maintained for a period of five (5) years from date of entry.

  [391-3-1-.02(6)(b)1]
- 5.1.3 The Permittee shall maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones.

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

#### **5.2** Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
  - a. A Continuous Opacity Monitoring System (COMS) for the measurement of opacity on each stack of the Heat Energy Systems (HES1 and HES2) and Dryers (DRY1 and DRY2). The span value for each COMS shall be between 60 and 80 percent per 40 CFR 60.48b(e)(1).

    [40 CFR 60.48b(a), 40 CFR 60.48b(f), 40 CFR 60.13 and 40 CFR 60.49b(b)]
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1, 40 CFR 60.48b(a), and 40 CFR 60.49b(f) for the energy system]
  - a. The combustion temperature of the RTOs and RCOs. The temperature monitoring device shall have an accuracy of  $\pm 2\%$  (°F).
  - b. The secondary voltage for each field of the Wet ESPs (WE01 and WE02). Such devices shall have a required accuracy of  $\pm 2\%$ .
  - c. The secondary current for each field of the Wet ESPs (WE01 and WE02). Such devices shall have a required accuracy of  $\pm 2\%$ .

5.2.3 The Permittee shall, using the data required to be recorded by Condition 5.2.2, determine the total power for each hour of operation. Total Wet ESP power shall be calculated using the following equation:

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

$$P_{t} = \sum_{i=1}^{n} V_{i} I_{i}$$

Where:

 $P_t$  = Total Wet ESP power (watts)

 $V_i$  = secondary voltage (kV) in wet ESP field i

I<sub>i</sub> = secondary current (ma) in ESP field i

n = Total number of fields in ESP

i = ith field in ESP (i = 1 to n)

5.2.4 The Permittee shall install, calibrate, maintain, and operate pressure drop indicators on each of the Hammermill Line baghouses (HBH1, HBH2, HBH3, HBH4, HBH5, HBH6, HBH7, HBH8, HBH9, and HBH10), Pellet Cooler Line baghouses (PBH1, PBH2, PBH3, PBH4, and PBH5), Conveying Equipment Aspiration System baghouses (CBH1 and CBH2), Pelletizing Area Vacuum System baghouse (PAB1) and the Dry Chip Storage Silo baghouse (DCS1). Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. The Permittee shall read and record the pressure drop at least once per day of operation. A logbook containing these records shall be available for inspection and/or submittal to the Division.

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

5.2.5 The Permittee shall perform checks of the visible emissions (VE) from the baghouses listed in Condition 5.2.4. VE checks shall be made daily, for each day of operation. The Permittee shall retain a record in a VE log, suitable for inspection or submittal.

The checks shall be conducted using the procedure below except when atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Any operational day when atmospheric conditions or sun position prevent a daily reading shall be reported as monitor downtime in the VE log. [391-3-1-.02(6)(b)1]

- a. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.
- b. For each source that exhibits visible emissions, the Permittee shall determine the cause of that visible emission and correct the problem in the most expedient manner possible.

The Permittee shall note the cause of the visible emission, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the log described above.

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- The Permittee shall implement a Preventive Maintenance Program (PMP) for the Hammermill Line baghouses (HBH1, HBH2, HBH3, HBH4, HBH5, HBH6, HBH7, HBH8, HBH9, and HBH10), Pellet Cooler Line baghouses (PBH1, PBH2, PBH3, PBH4, and PBH5), Conveying Equipment Aspiration System baghouses (CBH1 and CBH2), Pelletizing Area Vacuum System baghouse (PAB1) and the Dry Chip Storage Silo baghouse (DCS1). At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log: [391-3-1-.02(6)(b)1]
  - a. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This includes checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
  - b. Check dust collector hoppers and conveying systems for proper operation.
- 5.2.7 The Permittee shall calculate three-hour average wet ESP secondary power using data measured per Condition 5.2.3. [391-3-1-.02(6)(b)1, 40 CFR 60.48b(a), and 40 CFR 60.49b(f) for the energy system]
- 5.2.8 The Permittee shall ensure that temperatures in the RTO and RCO combustion zone are maintained above the levels established during the most recent compliance test and measured using a temperature sensor. The Permittee shall calculate rolling three hour average combustion temperature using data measured per Condition 5.2.2. [391-3-1-.02(6)(b)1]
- 5.2.9 The Permittee shall develop and implement a Preventive Maintenance Program for the catalytic oxidizers (RCO1 and RCO2) to assure that the provisions of Condition 1.1 are met. The program shall be subject to review and, if necessary to assure compliance, modification by the Division. At a minimum, the following operation and maintenance checks shall be made on at least an annual basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:

  [391-3-1-.02(6)(b)1]
  - a. Clean burner
  - b. Tighten burner valve linkage
  - c. Visually inspect catalyst bed for plugging. Catalyst bed should be free of particulate matter.
  - d. Visually inspect the inlet and outlet thermocouples, have thermocouples calibrated for proper operation

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- Visually inspect the inlet and outlet pressure sensors, have sensors calibrated for e. proper operation
- f. Visually inspect crossflow for plugging on burner side. If crossflow is dirty remove and clean with hose and water
- Visually inspect chamber for cracks g.
- h. Visually inspect process fan rotor for warpage, cracking, abnormal noise, and free
- i. Rotate the catalyst media annually according to the manufacturer's recommendations
- 5.2.10 The Permittee shall prepare a core sampling plan for the catalytic oxidizer (RC01 and RC02) per manufacturer's recommendation and submit to the Division thirty (30) days in advance of conducting any core sampling activity required by Condition 5.2.11. The following information shall be included in the required core sampling plan: [391-3-1-.02(6)(b)1, PSD Avoidance per 40 CFR 52.21 and 40 CFR 70.6(a)(3)(i)]
  - Location of samples taken. a.
  - b. Size of samples taken.
  - Number of samples taken. c.
- 5.2.11 The Permittee shall take a core sample of the catalyst bed at approximately one year intervals not to exceed thirteen months between tests per the plan submitted in Condition 5.2.10 and test core sample for catalyst activity. The first such sampling shall occur at 12 months from the from the last performance test. [391-3-1-.02(6)(b)1, PSD Avoidance per 40 CFR 52.21 and 40 CFR 70.6(a)(3)(i)]
- 5.2.12 The Permittee shall replace or clean the catalyst per manufacturer's recommendation if the core sample tested per Condition 5.2.11 shows a catalyst removal efficiency of less than 90 percent. This cleaning and/or replacement shall be done no later than thirty (30) days of the facility receiving the test results.
  - [391-3-1-.02(6)(b)1, PSD Avoidance per 40 CFR 52.21 and 40 CFR 70.6(a)(3)(i)]
- 5.2.13 The Permittee shall conduct a performance tune-up on the Heat Energy Systems (HES1 and HES2) biennially, as specified in 40 CFR 63.11223. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up and shall include the following:
  - [40 CFR 63.11196(a)(1), 40 CFR 63.11223(a) and (b), and Table 2 of 40 CFR 63 Subpart JJJJJJ]
  - As applicable, inspect the burner and clean or replace any components of the burner a. as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).

specifications, if available.

b. Inspect the flame pattern, as applicable and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's

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- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- d. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- e. Measure the concentrations in the effluent stream of carbon monoxide in parts per million by volume and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- f. Maintain onsite and submit, if requested by the Division, a biennial report containing the following information:
  - i. The concentrations of CO in the effluent stream in parts per million by volume and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the Heat Energy System.
  - ii. A description of any corrective actions taken as a part of the tune-up of the Heat Energy System.
  - iii. The type and amount of fuel used over the 12 months prior to the tune-up of the Heat Energy System.
- g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- 5.2.14 The following pollutant specific emission units (PSEU) are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

<b>Emission Unit</b>	Pollutant
Wood Chip Screen (LC01) and Conveying	PM
Equipment Aspiration Systems (CE01,	
CE02)	
Heat Energy Systems (HES1, HES2) and	PM, VOC and CO
Rotary Drum Dryers (DRY1, DRY2)	
Hammermill Lines (HML) and Pelletmill	PM and VOC
Lines (PML)	

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

5.2.15 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from Wood Chip Screen (LC01) and Conveying Equipment Aspiration Systems (CE01, CE02).

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[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]		Indicator No. 1 Visible Emission Checks	Indicator No. 2 Operation & Maintenance Checks
A.	Data Representativeness [64.3(b)(1)]	VE checks will be performed	O & M checks will identify damage to cyclone and baghouse from erosion, corrosion and leaks
В.	Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	n/a	n/a
C.	QA/QC Practices and Criteria [64.3(b)(3)]	VE observer will be trained to perform  VE checks	Operators will be trained to perform cyclone and baghouse checks.
D.	Monitoring Frequency [64.3(b)(4)]	Weekly	Weekly
E.	Data Collection Procedures [64.3(b)(4)]	Manually recorded in a operations logbook listing inspection findings and corrective actions taken.	Manually recorded in a operations logbook listing inspection findings and corrective actions taken.
F.	Averaging Period [64.3(b)(4)]	6 minutes	n/a

5.2.16 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from the Heat Energy Systems (HES1, HES2) and the Dryers (DRY1, DRY2).

[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Wet ESP total Power	Indicator No. 2 COMS on RTO Stack
A. Data Representativeness [64.3(b)(1)]	Secondary Voltage and Secondary Current are measured across each field. Total power greater than or equal to 80% of the operating limit during the most recent filterable PM performance test for three consecutive readings	Opacity monitored continuously using a COMS. Average opacity exceeding 20% except for one six minute period each hour greater than 27% opacity
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	n/a	n/a
C. QA/QC Practices and Criteria [64.3(b)(3)]	Routine maintenance and annual calibration checks per manufacturer specs.	Routine maintenance and annual calibration checks per manufacturer specs

Performance Criteria [64.4(a)(3)]		Indicator No. 1 Wet ESP total Power	Indicator No. 2 COMS on RTO Stack
D.	Monitoring Frequency [64.3(b)(4)]	continuous	continuous
E.	Data Collection Procedures [64.3(b)(4)]	Power data is calculated from secondary voltage and secondary current and recorded electronically.	Opacity data recorded electronically
F.	Averaging Period [64.3(b)(4)]	3 hours	6 minute

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5.2.17 The Permittee shall comply with the performance criteria listed in the table below for the VOC and CO emissions from the Heat Energy Systems (HES1, HES2) and the Dryers (DRY1, DRY2).

[40 CFR 64.6(c)(1)(iii)]

	formance Criteria .4(a)(3)]	Indicator No. 1 RTO combustion zone temperature	Indicator No. 2 RTO O&M checks
A.	Data Representativeness [64.3(b)(1)]	Thermocouples measure combustion zone temperature.	Operators check RTO condition weekly
В.	Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	n/a	n/a
C.	QA/QC Practices and Criteria [64.3(b)(3)]	Temperature ranges and minimum temperature established during performance testing. Thermocouples calibrated per manufacturer specs.	Operators are trained to take corrective actions as needed from observation during weekly inspection.
D.	Monitoring Frequency [64.3(b)(4)]	Continuous	Weekly
E.	Data Collection Procedures [64.3(b)(4)]	Temperature are recorded electronically and retained for five years.	Inspection logs maintained onsite for five years.
F.	Averaging Period [64.3(b)(4)]	3 hour rolling average temperature	n/a

5.2.18 The Permittee shall comply with the performance criteria listed in the table below for the VOC emissions from the Hammermill lines (HML) and Pellet mill Lines (PML). [40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 RCO Combustion chamber temperature	Indicator No. 2 RCO O&M checks
A. Data Representativeness [64.3(b)(1)]	Thermocouples measure combustion zone temperature.	Operators check RCO condition weekly

**Performance Criteria Indicator No. 1 Indicator No. 2** [64.4(a)(3)] RCO O&M checks **RCO** Combustion chamber temperature B. Verification of Operational Status (new/modified monitoring equipment only) n/a n/a [64.3(b)(2)] Temperature ranges and minimum Operators are trained to take C. QA/QC Practices and Criteria temperature established during corrective actions as needed [64.3(b)(3)] performance testing. Thermocouples from observations during the calibrated per manufacturer specs. weekly inspection. D. Monitoring Frequency Continuous Weekly [64.3(b)(4)]E. Data Collection Procedures Temperatures are recorded electronically Inspection logs maintained [64.3(b)(4)]and retained for five years. onsite for five years F. Averaging Period 3 hour rolling average temperature [64.3(b)(4)]n/a

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5.2.19 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from the Hammermill lines (HML) and Pellet mill Lines (PML). [40 CFR 64.6(c)(1)(iii)]

-	formance Criteria 4(a)(3)]	Indicator No. 1 Baghouse Pressure Drop	Indicator No. 2 O&M baghouse checks
	Data Representativeness [64.3(b)(1)]	Operations manuals, stack test data, vendor recommendation ensure data representativeness and accuracy.	Weekly baghouse checks identify any problem with baghouse operation.
	Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	n/a	n/a
	QA/QC Practices and Criteria [64.3(b)(3)]	Pressure gauges are calibrated and maintained per manufacturer specs.	Trained personnel perform weekly baghouse inspections
D.	Monitoring Frequency [64.3(b)(4)]	continuous	weekly
	Data Collection Procedures [64.3(b)(4)]	Pressure drops are recorded manually in a operations logbook	Inspection results and corrective actions are recorded manually in a O&M log.
	Averaging Period [64.3(b)(4)]	hourly	n/a

#### PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS

#### **6.1** General Record Keeping and Reporting Requirements

6.1.1 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 to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]

6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

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- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- 6.1.5 Where applicable, the Permittee shall keep the following records: [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]
  - a. The date, place, and time of sampling or measurement;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
- 6.1.6 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 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-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]
- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]

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a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any six-minute period during which the average opacity, measured and recorded in accordance with Condition 3.3.8, exceeds 20 percent, except for one 6-minute period per hour of not more than 27 percent opacity, for the Heat Energy Systems (HES1 and HES2).

    [40 CFR 60.49b(h)(3)]
  - ii. Any rolling twelve consecutive month total NOx, CO or VOC emissions from the facility in excess of 249 tons.
  - iii. Any rolling twelve consecutive month totals for a single HAP or total HAPs in excess of 10 tons or 25 tons respectively.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
  - i. Any three-hour average combustion temperature of the Regenerative Thermal Oxidizers (RTO1 and/or RTO2), measured and recorded per Condition 5.2.2 below 1,500°F or the combustion temperature established during the most recent Division-approved performance test.
  - ii. Any three-hour average combustion temperature of the Regenerative Catalytic Oxidizers (RCO1 and/or RCO2), measured and recorded per Condition 5.2.2 below 800°F or the combustion temperature established during the most recent Division-approved performance test.
  - iii. Any three-hour period during which the average total power for the Wet ESP (WE01 and WE02) is less than 80 percent of the value determined in accordance with Conditions 5.2.2 and 5.2.3.
  - iv. Any visible emissions from any baghouse, including the Pelletizing Area Vacuum System Baghouse (PAB1) which occurs for two consecutive determinations.
  - v. Anytime the annual catalyst bed core sampling was not performed as required by Condition 5.2.11.

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vi. Anytime the catalyst was not cleaned or replaced as required by Condition 5.2.12.

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vii. Anytime the performance tune up of the Heat Energy Systems (HES1 and HES2) was not performed once every two years per Condition 5.2.13.

#### 6.2 Specific Record Keeping and Reporting Requirements

6.2.1 The Permittee shall calculate the monthly PM, NOx and CO emissions from the Heat Energy Systems (HES1 and HES2)/Dryers (DRY1 and DRY2) using the records from Condition 6.2.11 and the following equation:

[PSD Avoidance per 40 CFR 52.21]

$$E = \left(\frac{\text{Emission Factor lb Pollutant}}{\text{ODT}}\right) \left(\text{Monthly Dry er Product ODT}\right) \left(\frac{\text{ton}}{2,000 \text{lb}}\right)$$

Where: E = tons of PM/NOx/CO pollutant per month ODT refers to Oven Dried Tons and refers to short tons.

The Permittee can later reestablish the PM, NOx and CO factors if it wishes. This may be done using the results from the PM, NOx and CO testing required by Conditions 4.2.1, 4.2.2 or any other testing, as long as it was done per the permit requirements. The results shall be submitted to the Division. Upon review and approval, the Permittee may then begin using the new factors to calculate PM, CO and NOx emissions. Note that this changes the PM, NOx and CO factors.

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

6.2.2 The Permittee shall calculate the monthly VOC, Formaldehyde, Acetaldehyde and Methanol emissions from the Heat Energy Systems (HES1 and HES2)/Dryers (DRY1 and DRY2) and monthly VOC emissions from Hammermills and Pellet coolers using the records from Condition 4.2.3 and the following equation. All emission factors and calculations shall be kept as part of the monthly records, readily available for inspection or submittal. VOC emissions shall be calculated using EPA OTM-26:

[Title III Major Source Avoidance and 391-3-1-.02(6)(b)1]

 $VOC = [Method\ 25A\ VOC\ as\ propane\ +\ Methanol\ as\ methanol\ +\ Formaldehyde\ as\ formaldehyde\ +\ Acetaldehyde\ as\ acetaldehyde] - [(0.65)\ Methanol\ expressed\ as\ propane]$ 

Where the final emission factors are the sum of all results from the Heat Energy Systems and Dryers, Hammermills, Pellet Mills and Pellet Coolers from the Pelletizing Lines for each pollutant.

Then determine the tons of pollutant per month using the following equation.

$$E = \left(\frac{\text{Emission Factor lb Pollutant}}{\text{ODT}}\right) \left(\text{Monthly Dry er Product ODT}\right) \left(\frac{\text{ton}}{2,000 \text{lb}}\right)$$

Where: E = tons pollutant per month

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ODT refers to Oven Dried Tons and refers to short tons.

The Permittee can later reestablish emissions factors if it wishes. This may be done using the results from the testing required by Condition 4.2.3 or any other testing, as long as it was done per the permit requirements. The results shall be submitted to the Division. Upon review and approval, the Permittee may then begin using the new factors to calculate HAP emissions.

Monthly HAPs = (Production in ODT)  $(EF_F + EF_M + EF_A + EF_O)$ 

Where:  $EF_F = Emission Factor for Formaldehyde (lb/ODT)$ 

 $EF_M = Emission Factor for Methanol (lb/ODT)$ 

 $EF_A$  = Emission Factor for Acetaldehyde (lb/ODT)  $EF_O$  = 0.0205 lb/ODT (Emission Factor for Others)

6.2.3 The Permittee shall use the monthly PM, NOx, CO, VOC, Formaldehyde, Acetaldehyde, Methanol and total HAP emission data from Conditions 6.2.1 and 6.2.2 to calculate the twelve-month rolling total of each pollutant emissions from the Heat Energy Systems (HES1 and HES2)/Dryers (DRY1 and DRY2), Hammermills, Pelletmills and Pellet coolers for each calendar month in the reporting period. These records shall be kept available for inspection or submittal.

[391-3-1-.03(2)(c)]

- 6.2.4 The Permittee shall notify the Division in writing if any individual HAP or total HAP emissions equal or exceed the limits in Condition 2.1.2 during any rolling 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(s) in Condition 2.1.2.

  [391-3-1-.03(2)(c)]
- 6.2.5 The Permittee shall notify the Division in writing if the total NOx, VOC or CO emissions from the facility equal or exceed 249 tons during any rolling 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 PSD avoidance limits in Conditions 2.1.1.

[391-3-1-.03(2)(c)]

6.2.6 The Permittee shall maintain the following records in order to comply with the recordkeeping requirements of 40 CFR 63 Subpart JJJJJJ for the Heat Energy Systems (HES1 and HES2).

[40 CFR 63.11214, 40 CFR 63.11223, 40 CFR 63.11225(c), and 40 CFR Subpart 241]

- a. The Permittee must keep a copy of each notification and report that is submitted to comply with Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted.
- b. The Permittee must keep records to document conformance with the work practices, emission reduction measures and management practices required by 40 CFR 63.11214 and 63.11223 as specified:

i. Records must identify each Heat Energy System, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the Heat Energy System was tuned.

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- ii. Records documenting that no secondary materials that are solid waste were combusted in the Heat Energy Systems in accordance with the definitions and The Permittee must keep a copy of the energy assessment report.
- c. Records of the occurrence and duration of each malfunction of the heat energy system, or of the associated air pollution control and monitoring equipment.
- d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions as required by Condition 3.3.5 in accordance with 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning Heat Energy System, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- 6.2.7 The Permittee shall prepare and submit to the Division a biennial compliance report to comply with the requirements of 40 CFR 63 Subpart JJJJJJ, which shall include the following information:

[40 CFR 63.11225(b)]

- a. Company name and address.
- b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of Subpart JJJJJ. The notification must include the following certification(s) of compliance, as applicable, signed by a responsible official:
  - i. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up of each Heat Energy System."
  - ii. "No secondary materials that are solid waste were combusted in the Heat Energy System."
- c. A description of any deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 6.2.8 The Permittee shall maintain a record of all actions taken in accordance with Section 8.22 in the current permit to suppress fugitive dust from any process(s) or any other source of fugitive dust. Such records shall include the date and time of occurrence and a description of the actions taken.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.9 The Permittee shall use the hour meters required by Conditions 8.27.1 and 8.27.3 to determine and record the following:

[391-3-1-.02(6)(b)1. and 40 CFR 52.21]

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- a. The total operating hours for each of the emergency generator engines (EG01 and EG02) during every calendar month.
- b. The total operating hours for each of the emergency generator engines (EG01 and EG02) for the twelve consecutive month period ending with each calendar month.
- 6.2.10 The Permittee shall maintain records to demonstrate that each shipment of diesel fuel received for combustion in the emergency generator engines (EG01 and EG02) and the fire water pump engine (FP01) complies with the requirements of Condition 3.3.2. Verification shall consist of either of the following:

[40 CFR 60.4207(b) and 391-3-1-.02(2)(g)2.(subsumed)]

- a. Fuel oil receipts obtained from the fuel supplier certifying that the oil is diesel fuel and complies with the standards; or
- b. Analysis of the diesel fuel conducted by methods of sampling and analysis which have been specified or approved by the Division which demonstrates that the diesel fuel complies with the standards.
- 6.2.11 The Permittee shall submit, with the report required by Condition 6.1.4, a semiannual report that contains the following records. The records shall be available for inspection or submittal to the Division upon request and contain:

[391-3-1-.02(6)(b)1, PSD Avoidance per 40 CFR 52.21 and 40 CFR 70.6(a)(3)(i)]

- a. The quantity of wood products processed in oven dry tons (ODT) in the dryers DRY1 and DRY2 during each calendar month in the semiannual reporting period.
- b. The total quantity of wood products processed in oven dry tons (ODT) in the dryers DRY1 and DRY2 for the 12 consecutive month period ending with each calendar month in the semiannual reporting period.
- 6.2.12 The Permittee shall keep operating records to determine the total amount of wood chips and wood pellet processed in oven dried tons (ODT) (short tons) in the Drum Dryers (DRY1 and DRY2), the Hammermills (HML), the Pellet Mills (PML), the Pellet Cooler (PCL), and the Railcar Loadout (RL), on a monthly basis by recording all raw material inputs. The oven dried shall be calculated as below:

Oven dried ton (ODT) = weight of wood in tons \*(1 - % moisture content in the wood) [Avoidance of 40 CFR 52.21]

#### PART 7.0 OTHER SPECIFIC REQUIREMENTS

#### 7.1 Operational Flexibility

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.

[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

# 7.2 Off-Permit Changes

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:

[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

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7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act. [Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

#### **7.3** Alternative Requirements

[White Paper #2]

Not Applicable

#### 7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

#### 7.5 Temporary Sources

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable

#### 7.6 Short-term Activities

(see Form D5 "Short Term Activities" of the Permit application and White Paper #1)

Not Applicable

#### 7.7 Compliance Schedule/Progress Reports

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable

#### 7.8 Emissions Trading

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

#### 7.9 Acid Rain Requirements

Not Applicable

#### 7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

- 7.10.1 When and if the requirements of 40 CFR Part 68 becomes applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.
  - a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.

- b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
  - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

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- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
- iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
- iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP\*eSubmit (information for establishing an account can be found at <a href="https://www.epa.gov/rmp/rmpesubmit">www.epa.gov/rmp/rmpesubmit</a>). Electronic Signature Agreements should be mailed to:

**MAIL** 

Risk Management Program (RMP) Reporting Center P.O. Box 10162 Fairfax, VA 22038

#### COURIER & FEDEX

# Risk Management Program (RMP) Reporting Center CGI Federal 12601 Fair Lakes Circle Fairfax, VA 22033

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

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#### 7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166. [Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

# 7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
2499-299-0053-V-02-0	December 19, 2013
2499-299-0053-V-02-1	February 17, 2014
2499-299-0053-V-02-2	November 12, 2014
2499-299-0053-V-02-3	May 22, 2017

#### 7.13 Pollution Prevention

None applicable

# 7.14 Specific Conditions

None applicable

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#### PART 8.0 GENERAL PROVISIONS

#### **8.1** Terms and References

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence. [391-3-1-.02(2)(a)2]

#### 8.2 EPA Authorities

- 8.2.1 Except as identified as "State-only enforceable" requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.

  [40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, "Inspections, Monitoring, and Entry." [40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, "Emergency Powers." [40 CFR 70.6(f)(3)(i)]

#### 8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.

[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

#### **8.4** Fee Assessment and Payment

8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."

[391-3-1-.03(9)]

### 8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.

  [391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.

[391-3-1-.03(10)(e)3(i)]

8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation. [391-3-1-.03(10)(e)3(iii)]

#### **8.6** Transfer of Ownership or Operation

8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.

[391-3-1-.03(4)]

#### 8.7 Property Rights

8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

#### 8.8 Submissions

8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch Atlanta Tradeport, Suite 120 4244 International Parkway Atlanta, Georgia 30354-3908

8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

Air and EPCRA Enforcement Branch – U. S. EPA Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]

8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

# 8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

  [391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

#### 8.10 Modifications

8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The 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. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.

[391-3-1-.03(1) through (8)]

## 8.11 Permit Revision, Revocation, Reopening and Termination

8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:

[391-3-1-.03(10)(d)1(i)]

a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;

[391-3-1-.03(10)(e)6(i)(I)]

b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;

[391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)

c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or

[391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]

d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

[391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]

8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.

[391-3-1-.03(10)(e)6(ii)]

8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.

[391-3-1-.03(10)(e)6(iii)]

8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]

- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

### 8.12 Severability

8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

### **8.13** Excess Emissions Due to an Emergency

- 8.13.1 An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:

[391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(2) and (3)]

- a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
- b. The Permitted facility was at the time of the emergency being properly operated;

c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and

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- d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

# **8.14** Compliance Requirements

## 8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred:
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

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e. Any additional requirements specified by the Division.

### 8.14.2 Inspection and Entry

a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]

- i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
- iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.

  [391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

## 8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
   [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
  - [331-3-1-.03(10)(C)2 and 40 CFR 70.3(C)(8)(III)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]

c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

#### 8.14.4 Excess Emissions

a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that: [391-3-1-.02(2)(a)7(i)]

- i. The best operational practices to minimize emissions are adhered to;
- ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and

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- iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control. [391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.

  [391-3-1-.02(2)(a)7(iii)]

### 8.15 Circumvention

### **State Only Enforceable Condition.**

8.15.1 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 which is based on the concentration of the pollutants in the gases discharged into the atmosphere.

[391-3-1-.03(2)(c)]

#### 8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.

  [391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as "State only enforceable" does not have a Permit shield.

## **8.17 Operational Practices**

8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the 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 any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.

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[391-3-1-.02(2)(a)10]

### State Only Enforceable Condition.

8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

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

#### **8.18** Visible Emissions

8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

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

## 8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input. [391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

  [391-3-1-.02(2)(d)]
- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. [391-3-1-.02(2)(d)]

#### 8.20 Sulfur Dioxide

8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.

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

#### **8.21 Particulate Emissions**

8.21.1 Except as may be specified in other provisions of this Permit, 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 allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.

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

a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

 $E = 4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour.  $E = 55P^{0.11} - 40$ ; for process input weight rate above 30 tons per hour.

b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and P = process input weight rate in tons per hour.

# **8.22 Fugitive Dust**

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

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
  - 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;

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- 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 dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

## 8.23 Solvent Metal Cleaning

- 8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied: [391-3-1-.02(2)(ff)1]
  - a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
  - b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
  - c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
    - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
    - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
    - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
  - d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
  - e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

#### 8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:

  [391-3-1-.02(2)(c)1-4]
  - a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.

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- b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
  - a. It is a multiple chamber incinerator;
  - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
  - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

### 8.25 Volatile Organic Liquid Handling and Storage

8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.

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

### 8.26 Use of Any Credible Evidence or Information

8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[391-3-1-.02(3)(a)]

## **8.27 Internal Combustion Engines**

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of 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." Such requirements include but are not limited to:

  [40 CFR 60.4200]
  - a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
  - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
  - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
  - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
  - e. Maintain any records in accordance with Subpart IIII
  - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.

  [40 CFR 60.4230]

8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for ≤500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to: [40 CFR 63.6580]

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- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
  - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
  - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

#### **8.28** Boilers and Process Heaters

8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."

[40 CFR 63.11193]

8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."

[40 CFR 63.7480]

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## **Attachments**

- A. List of Standard Abbreviations and List of Permit Specific AbbreviationsB. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic **Emission Groups**
- C. List of References

## ATTACHMENT A

# **List Of Standard Abbreviations**

AIRS	Aerometric Information Retrieval System		
APCD	Air Pollution Control Device		
ASTM	American Society for Testing and Materials		
BACT	Best Available Control Technology		
BTU	British Thermal Unit		
CAAA	Clean Air Act Amendments		
CEMS	Continuous Emission Monitoring System		
CERMS	Continuous Emission Rate Monitoring System		
CFR	Code of Federal Regulations		
CMS	Continuous Monitoring System(s)		
CO	Carbon Monoxide		
COMS	Continuous Opacity Monitoring System		
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic		
	Meter		
EPA	United States Environmental Protection Agency		
EPCRA	Emergency Planning and Community Right to		
	Know Act		
gr	Grain(s)		
GPM (gpm)	Gallons per minute		
H <sub>2</sub> O (H2O)	Water		
HAP	Hazardous Air Pollutant		
HCFC	Hydro-chloro-fluorocarbon		
MACT	Maximum Achievable Control Technology		
MMBtu	Million British Thermal Units		
MMBtu/hr	Million British Thermal Units per hour		
MVAC	Motor Vehicle Air Conditioner		
MW	Megawatt		
NESHAP	National Emission Standards for Hazardous Air		
	Pollutants		
NO <sub>x</sub> (NOx)	Nitrogen Oxides		
NSPS	New Source Performance Standards		
OCGA	Official Code of Georgia Annotated		

<b>-</b>	
PM	Particulate Matter
$PM_{10}$	Particulate Matter less than 10 micrometers in
(PM10)	diameter
PPM (ppm)	Parts per Million
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>2</sub> (SO2)	Sulfur Dioxide
USC	United States Code
VE	Visible Emissions
VOC	Volatile Organic Compound

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# **List of Permit Specific Abbreviations**

#### **ATTACHMENT B**

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	Cleaning and sweeping of streets and paved surfaces	
Combustion Equipment	Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-103(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-102 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-102(2)(mmm).7	2
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	1
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
Maintenance, Cleaning, and Housekeeping	Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	<ol> <li>Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.</li> </ol>	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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# INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or	
and Testing	chemical analysis.  2. Research and development facilities, quality control testing facilities and/or small pilot projects, where	
	combined daily emissions from all operations are not individually major or are support facilities not	
	making significant contributions to the product of a collocated major manufacturing facility.	
Pollution	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment	
Control	subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or	
	other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112	
	(excluding 112(r)) of the Federal Act.	
Industrial Operations	<ol> <li>Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.</li> </ol>	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural	
	gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-	
	coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000	
	pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing,	
	buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber,	
	concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	<ul><li>iii) No visible emissions enter the outdoor atmosphere.</li><li>4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant</li></ul>	
	energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for	
	sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.  7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	7. Equipment for the mining and screening of uncrushed native said and graver.	
	8. Ozonization process or process equipment.	
	<ol><li>Electrostatic powder coating booths with an appropriately designed and operated particulate control system.</li></ol>	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient	
	temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are	
	less than 1,000 pounds per year.	

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# INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less	
Equipment	than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid	
	with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any	1
	standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	1
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that is not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

# INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities		
Emergency abort stack for each dryer line	2	
Emergency abort stack for each Heat Energy System	2	
Process Building Vacuum System	1	

## **ATTACHMENT B** (continued)

## **GENERIC EMISSION GROUPS**

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

	Number of Units (if appropriate)	Applicable Rules		
Description of Emissions Units / Activities		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	8
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	10
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

#### ATTACHMENT C

#### LIST OF REFERENCES

- 1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
- 2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
- 3. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.
- 4. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.
- 5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at <a href="https://www.epa.gov/ttn/chief/ap42/index.html">www.epa.gov/ttn/chief/ap42/index.html</a>.
- 6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at <a href="https://www.epa.gov/ttn/chief/software/tanks/index.html">www.epa.gov/ttn/chief/software/tanks/index.html</a>.
- 7. The Clean Air Act (42 U.S.C. 7401 et seq).
- 8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
- 9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).