



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120
Atlanta, Georgia 30354
404-363-7000

MEMORANDUM:

TO: Stephen Damaske
THROUGH: Daniel McCain
FROM: Marie Miller
SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF1 and EF2)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF1	65	70	70	
	EF2	68	69	70	
GAS MOISTURE (%)	EF1	2.1	2.5	2.5	
	EF2	2.4	2.5	2.5	
GAS FLOW RATE (ACFM)	EF1	33782	22448	24033	
	EF2	20098	24343	25172	
GAS FLOW RATE (DSCFM)	EF1				
	EF2				
POLLUTANT CONCENTRATION (µg/m3)	EF1	86	227	200	171
	EF2	97	254	189	180
EMISSION RATE (LB/HR)	EF1	0.0106	0.0185	0.0175	0.0156
	EF2	0.0071	0.0226	0.0173	0.0157
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
 Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

 Test results were reported for informational puposes. Facility does not currently



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have permitted EtO emission limits.



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TO: Stephen Damaske
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SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF3 and EF4)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF3	68	69	70	
	EF4	71	69	71	
GAS MOISTURE (%)	EF3	2.4	2.5	2.5	
	EF4	2.6	2.5	2.6	
GAS FLOW RATE (ACFM)	EF3	26278	25065	25215	
	EF4	24273	14301	17149	
GAS FLOW RATE (DSCFM)	EF3				
	EF4				
POLLUTANT CONCENTRATION (µg/m3)	EF3	121	357	344	274
	EF4	153	255	244	217
EMISSION RATE (LB/HR)	EF3	0.0116	0.0326	0.0316	0.0253
	EF4	0.0135	0.0133	0.0152	0.0140
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

Test results were reported for informational puposes. Facility does not currently



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SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF5 and EF6)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF5	69	70	71	
	EF6	63	67	72	
GAS MOISTURE (%)	EF5	2.5	2.5	2.6	
	EF6	2.0	2.3	2.7	
GAS FLOW RATE (ACFM)	EF5	32357	21399	23478	
	EF6	26205	14995	19620	
GAS FLOW RATE (DSCFM)	EF5				
	EF6				
POLLUTANT CONCENTRATION (µg/m3)	EF5	151	225	201	192
	EF6	138	208	208	184
EMISSION RATE (LB/HR)	EF5	0.0178	0.0175	0.0171	0.0175
	EF6	0.0133	0.0114	0.0148	0.0132
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

Test results were reported for informational puposes. Facility does not currently



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SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF7 and EF8)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF7	63	67	69	
	EF8	61	66	72	
GAS MOISTURE (%)	EF7	2.0	2.3	2.5	
	EF8	1.9	2.2	2.7	
GAS FLOW RATE (ACFM)	EF7	26400	18295	22207	
	EF8	23385	24448	25733	
GAS FLOW RATE (DSCFM)	EF7				
	EF8				
POLLUTANT CONCENTRATION (µg/m3)	EF7	126	174	190	163
	EF8	160	230	264	218
EMISSION RATE (LB/HR)	EF7	0.0123	0.0117	0.0154	0.0131
	EF8	0.0139	0.0206	0.0246	0.0197
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
 Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

 Test results were reported for informational puposes. Facility does not currently



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The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF9 and EF10)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE	
GAS TEMPERATURE (°F)	EF9	62	73	74		
	EF10	64	67	70		
GAS MOISTURE (%)	EF9	1.9	2.8	2.9		
	EF10	2.1	2.3	2.5		
GAS FLOW RATE (ACFM)	EF9	30085	26159	28934		
	EF10	25571	18078	20542		
GAS FLOW RATE (DSCFM)	EF9					
	EF10					
POLLUTANT CONCENTRATION (µg/m3)	EF9	122	224	190		178
	EF10	124	280	240		215
EMISSION RATE (LB/HR)	EF9	0.0136	0.0212	0.0199	0.0182	
	EF10	0.0117	0.0186	0.0180	0.0161	
TOTAL (LB/HR)						

PERCENT ALLOWABLE (%)

OTHER INFORMATION
Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

Test results were reported for informational puposes. Facility does not currently



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The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF11 and EF12)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF11	67	67	67	
	EF12	68	67	74	
GAS MOISTURE (%)	EF11	2.3	2.3	2.9	
	EF12	2.4	2.3	2.9	
GAS FLOW RATE (ACFM)	EF11	25897	23401	25195	
	EF12	17767	23163	24952	
GAS FLOW RATE (DSCFM)	EF11				
	EF12				
POLLUTANT CONCENTRATION (µg/m3)	EF11	110	307	274	230
	EF12	157	229	194	193
EMISSION RATE (LB/HR)	EF11	0.0104	0.0263	0.0250	0.0205
	EF12	0.0102	0.0194	0.0175	0.0157
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
 Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

 Test results were reported for informational puposes. Facility does not currently



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The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF13 and EF14)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF13	65	67	75	
	EF14	65	68	73	
GAS MOISTURE (%)	EF13	2.1	2.3	3.0	
	EF14	2.1	2.4	2.8	
GAS FLOW RATE (ACFM)	EF13	23958	25348	26950	
	EF14	21863	21992	23549	
GAS FLOW RATE (DSCFM)	EF13				
	EF14				
POLLUTANT CONCENTRATION (µg/m3)	EF13	163	228	207	199
	EF14	116	183	172	157
EMISSION RATE (LB/HR)	EF13	0.0144	0.0212	0.0201	0.0185
	EF14	0.0093	0.0147	0.0147	0.0129
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

Test results were reported for informational puposes. Facility does not currently



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The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Exhaust Fans (EF15 and EF16)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Marie Miller
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
MAXIMUM EXPECTED OPERATING CAPACITY	N/A
OPERATING CAPACITY	N/A
ALLOWABLE EMISSION RATE	N/A
APPLICABLE REGULATION	N/A
CONTROL EQUIPMENT AND MONITORING DATA	N/A

TEST RUN #		1	2	3	AVERAGE
GAS TEMPERATURE (°F)	EF15	53	73	73	
	EF16	70	70	73	
GAS MOISTURE (%)	EF15	1.4	2.8	2.8	
	EF16	2.5	2.5	2.8	
GAS FLOW RATE (ACFM)	EF15	18033	23063	22876	
	EF16	27626	21617	23751	
GAS FLOW RATE (DSCFM)	EF15				
	EF16				
POLLUTANT CONCENTRATION (µg/m3)	EF15	97	165	158	140
	EF16	95	159	187	147
EMISSION RATE (LB/HR)	EF15	0.0066	0.0138	0.0131	0.0112
	EF16	0.0096	0.0125	0.0161	0.0127
TOTAL (LB/HR)					

PERCENT ALLOWABLE (%)

OTHER INFORMATION
 Gas Flow Rates in units of WSCFM were used to determine the Emission Rates in lb/hr because the EtO measurements were conducted on a wet basis (using EPA Method TO-15). Therefore Gas Flow Rates in units of DSCFM were not reported.

 Test results were reported for informational puposes. Facility does not currently



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The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Fence Line (FL1-FL4)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Not Witnessed
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
APPLICABLE REGULATION	N/A

MEMORANDUM

Ethylene Oxide sampling was conducted at four ambient fence line locations (FL1-FL4) using EPA Method TO-15. FL1 sampling was conducted south of the facility. FL2 sampling was conducted north of the facility. FL3 sampling was conducted west of the facility. FL4 sampling was conducted east of the facility. Please see table below for reported EtO concentrations in units of ug/m3.

Location	Run 1	Run 2	Run 3	Average
FL1	0.575	0.618	1.60	0.931
FL2	0.437	0.920	1.30	0.886
FL3	0.531	1.02	1.87	1.14
FL4	1.67	1.35	1.44	1.49



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FROM: Marie Miller
SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

COMPANY NAME	KPR U.S. LLC
COMPANY LOCATION	Atlanta, GA
SOURCE TESTED	Input Fans (IF1, IF2, IF4, IF6 - IF9) and Inside Warehouse (IW2)
POLLUTANT DETERMINED	Ethylene Oxide
REPORT REVIEWED BY	Marie Miller
TEST WITNESSED BY	Not Witnessed
DATE(S) OF TEST	December 8, 2020 to December 11, 2020
DATE RECEIVED BY APB	January 4, 2021
APPLICABLE REGULATION	N/A

MEMORANDUM

Ethylene Oxide sampling results were reported for seven intake fans (IF1, IF2, IF4, IF6 - IF9) and one inside warehouse location (IW2) using EPA Method TO-15. No results were reported for Air Intake Fans IF3 and IF5 because they were not operational during the EtO sampling event.

Please see table below for reported EtO concentrations in units of ug/m3.

Location	Run 1	Run 2	Run 3	Average
IF1	0.819	1.77	2.06	1.55
IF2	1.24	2.77	2.40	2.14
IF4	1.17	2.78	2.51	2.15
IF6	1.24	2.28	2.46	1.96
IF7	1.15	2.53	2.63	2.10
IF8	1.16	1.96	2.83	1.98
IF9	1.52	2.71	2.92	2.35
IW2	121	184	172	160

Please see table below for reported EtO emission rates in units of lb/hr.

Location	Run 1	Run 2	Run 3	Average
IF1	0.000095	0.000284	0.000311	0.000230
IF2	0.000169	0.000532	0.000469	0.000390
IF4	0.000166	0.000428	0.000417	0.000337
IF6	0.000189	0.000318	0.000365	0.000286
IF7	0.000167	0.000381	0.000427	0.000325
IF8	0.000192	0.000256	0.000496	0.000315
IF9	0.000255	0.000451	0.000590	0.000426

Reported results are for informational purposes only.