
Georgia's State Plan for Implementation of the Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units



Air Protection Branch

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Executive Summary

This document is Georgia's State Plan for the implementation of 40 CFR part 60, subpart M, EPA's *Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units*. An existing sewage sludge incineration (SSI) unit is defined by subpart M as an SSI unit that is located at a wastewater treatment facility and that commenced construction on or before October 14, 2010. The emission guidelines set limits on stack emissions of nine pollutants plus fugitive emissions from existing SSI units.

The state plan is required by 40 CFR part 60, subpart B and includes the following components:

- Facility inventory and unit-level emissions inventory
- Emissions limits and standards
- Compliance dates and increments of progress for affected units
- Performance testing, recordkeeping, and reporting requirements
- Operator training and qualification requirements
- Documentation of public notification and participation
- Provision for State progress reports to EPA
- Identification of enforceable state mechanisms for implementing the emission guidelines
- Demonstration of the State's legal authority to carry out the plan

To meet EPA's requirement for subpart M, Georgia EPD has promulgated Georgia Rule 391-3-1-.02(2)(www) for the regulation of existing SSI units. This Georgia Rule, in conjunction with the State Plan, ensures that existing SSI units meet performance requirements that are at least as stringent as the SSI emission guidelines and compliance times.

There are four operable existing SSI units in the State of Georgia, two located at the R.M. Clayton Water Reclamation Center and two located at the R.L. Sutton Water Reclamation Facility.

The existing SSI units are subject to the requirements of this plan and to Georgia Rule 391-3-1-.02(2)(www). The owner or operator of each unit shall comply with the applicable requirements Georgia Rule (www) upon EPA approval of this SSI Plan.

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List of Acronyms

Acronym	Meaning
CAA	Clean Air Act
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CWA	Clean Water Act
EG	Emission guidelines
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
FB	Fluidized bed
mg/dscm	milligram per dry standard cubic meter
MH	Multiple hearth
ng/dscm	nanogram per dry standard cubic meter
O.C.G.A	Official Code of Georgia Annotated
OSHA	Occupational Safety and Health Administration
ppmvd	parts per million by volume, dry basis
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
PTM	Procedures for Testing and Monitoring Sources of Air Pollutants, GA EPD, Air Protection Branch
SSI	Sewage Sludge Incineration
TEQ	Toxic equivalency

1.0 Introduction

This document is Georgia's State Plan for the implementation of U.S. EPA's *Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units* (40 CFR part 60, subpart MMMM). An existing sewage sludge incineration (SSI) unit is an SSI unit that is located at a wastewater treatment facility and that commenced construction on or before October 14, 2010. The emission guidelines (EG) set limits on emissions of nine pollutants plus fugitive emissions from existing SSI units. New SSI units are regulated under 40 CFR Subpart LLLL – Standards of Performance for New Sewage Sludge Incineration Units which has been incorporated into the Georgia Rules for Air Quality Control by reference.

In both subparts LLLL (new SSI units) and MMMM (existing SSI units), a wastewater treatment facility is one that is “designed to treat domestic sewage sludge” (see 40 CFR 60.4780). Neither subpart contains a more specific definition or description of a wastewater treatment facility. Therefore, for the purposes of this State Plan, wastewater treatment facility will mean a facility that is subject to a National Pollutant Discharge Elimination System (NPDES) permit for discharge into the waters of the State of Georgia (reference Georgia's Rules for Water Quality Control O.C.G.A. 391-3-6).

Sewage sludge incinerators are installed at domestic wastewater treatment plants to reduce the volume of sludge, which is the waste produced by the wastewater treatment process. The sludge consists primarily of biomass and water, but also typically contains small amounts of a number of metals and man-made organic compounds. An SSI unit uses a controlled flame to burn the combustible matter in the sludge. Combustion of sewage sludge produces a number of air pollutants; some of which are present in the incinerator feed and are vaporized and others that are formed by the combustion process.

There are two types of incinerators used for SSI: fluidized bed (FB) and multiple hearth (MH). In a FB incinerator, waste is combusted by injecting it into a fluidized bed of sand or alumina (i.e., a bed of inorganic particles suspended in a heated air stream). In a MH incinerator, waste is combusted by raking ignited waste across an upper level hearth into an opening. The waste falls through the opening to the hearth below, where it is raked to another opening, falls to the next lower hearth, and so on. Levels of regulated air pollutants emitted from the fluidized bed process are typically lower than levels emitted from the multiple hearth process. The two remaining units in Georgia, both located at R.M. Clayton, are multiple hearth incinerators.

2.0 Regulation of Air Pollutant Emissions from Existing SSI Units

Emissions of air pollutants from existing SSI units are regulated under the Clean Air Act (CAA) and the Clean Water Act (CWA). The CAA and CWA requirements are described below. The purpose of this State Plan is to ensure compliance of existing SSI units with the requirements of the CAA.

2.1 CAA Requirements

SSI units are regulated as solid waste incinerators under CAA section 129, *Solid Waste Combustion*, and also under CAA section 111, *Standards of Performance for New Stationary Sources* (NSPS). Subsections 129(b) and 111(d) address emissions from existing units and provide for emission guidelines for these units. These statutory requirements are implemented through the following Federal regulations:

- 40 CFR part 60, subpart B: *New Source Performance Standards, Adoption and Submittal of State Plans*; and
- 40 CFR part 60, subpart M: *Emission Guidelines and Compliance Times for Sewage Sludge Incineration Units – Final rule promulgated March 21, 2011.*

Under subpart M, existing SSI units are those that are located at wastewater treatment facilities and that commenced construction on or before October 14, 2010 (40 CFR 60.5005(a)). Emission limits and requirements for a state plan for existing SSI units are discussed below.

2.2 Emission Limits

The pollutant emission limits for existing SSI units are expressed as emission rates in mass per volume of effluent gas. The limits are presented in Table 2-1. There are separate sets of limits for FB units and MH units, with the FB limits being more stringent. There is also a limit on fugitive emissions from ash handling. Visible emissions from the ash conveying system must be no more than 5% of the hourly observation period.

Table 2-1. Emission Limits for Existing SSI Units

Pollutant	Units of Measurement (at 7% O₂)	Limit – Fluidized Bed	Limit – Multiple Hearth
particulate matter (PM)	mg/dscm	18	80
hydrogen chloride (HCl)	ppmvd	0.51	1.2
carbon monoxide (CO)	ppmvd	64	3,800
dioxins/furans: total mass ¹	ng/dscm	1.2	5.0
dioxins/furans toxic equivalency (TEQ) ¹	ng/dscm	0.10	0.32
mercury (Hg)	mg/dscm	0.037	0.28
oxides of nitrogen (NO _x)	ppmvd	150	220
sulfur dioxide (SO ₂)	ppmvd	15	26
cadmium (Cd)	mg/dscm	0.0016	0.095
lead (Pb)	mg/dscm	0.0074	0.30
Fugitive emissions: ash handling	NA	5% or less of observation period	5% or less of observation period

2.3 Requirements for a State Plan

The requirements for a state to submit state plans are included in both 40 CFR part 60, subpart B and in 40 CFR part 60, subpart M. 40 CFR part 60, subpart B contains more general requirements for all new and existing sources, whereas subpart M is specific to existing SSI units. In two cases, subpart M requirements supersede subpart B

¹ Affected sources can comply with either the total mass basis or toxic equivalency (TEQ) basis emission limit for dioxins/furans.

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requirements per 40 CFR 60.5040. First, state plans must be as protective as the emission guidelines, and they must require all SSI units to comply by the dates specified in 40 CFR 60.5035. This applies instead of the option for case-by-case less stringent emissions standards and longer compliance schedules in 40 CFR 60.24(f). Second, state plans are required to implement a minimum of two increments of progress: one on the final control plan submittal date and the second one on the final compliance date in 40 CFR 60.21(h)(1) and 60.21(h)(5). This applies instead of the requirement of 60.24(e)(1) that would require a state plan to include all five increments of progress for all SSI units.

The plan elements required by 40 CFR part 60, subpart Mmmm are listed in Table 2-2 along with cross-references to the corresponding sections of the Georgia State Plan. Subpart Mmmm requirements for Title V permits are discussed in Section 10.0, even though Title V is not a required plan element.

Table 2-2. Required State Plan Elements

Plan Element	Section of Georgia State Plan
Facility inventory	3.1
Unit-level emissions inventory	3.2
Compliance dates and increments of progress for affected units	6.0
Emission limits	2.2
Operating limits	8.0
Operator training and qualification requirements	5.0
Performance testing, recordkeeping, and reporting requirements	7.0
Documentation of public notification and participation	11.1
Provision for State progress reports to EPA	9.0
Identification of enforceable state mechanisms for implementing the emission guidelines	11.2
Demonstration of the State's legal authority to carry out the plan	11.3

2.4 Georgia Rule 391-3-1-.02(2)(www)

Existing SSI units must comply with Georgia Rule 391-3-1-.02(2)(www), *Sewage Sludge Incineration Units* (see Appendix A). This Georgia Rule was promulgated to ensure that affected SSI units comply with the requirements of the federal emission guidelines' rule (40 CFR part 60, subpart M). Georgia's Rule adopts the SSI Emission Guidelines by reference, with the exception of some requirements primarily related to operating limits, performance testing and monitoring, demonstration of initial and continuous compliance, and reporting and recordkeeping. These requirements are addressed by revisions to the Air Branch's Procedures for Testing and Monitoring (PTM) Sources of Air Pollutants (see Appendix B) and are at least as protective as the corresponding federal requirements.

2.5 CWA Requirements

Sewage sludge is also regulated under the Clean Water Act (CWA). 40 CFR part 503, *Standards for the Use or Disposal of Sewage Sludge*, establishes standards for the final use or disposal of sewage sludge generated by the treatment of domestic wastewater at a treatment works.

Subpart E regulates incineration of biosolids and includes limits on seven metals and on total hydrocarbons. Three of the metals – cadmium, lead, and mercury – are also regulated under the Clean Air Act's EG. It should be noted that the requirements of the CAA's EG do not take the place of or otherwise affect the CWA's 40 CFR part 503 requirements.

3.0 Facility and Emission Inventories

There are four operable existing SSI units in the State of Georgia. An inventory of the facilities and inventories of SSI unit emissions of the EG pollutants are presented below. Should another source be discovered subsequent to this notice, there will be no need to reopen the State Plan. All required items will be reported as agreed in Georgia's Air Planning Agreement (see Appendix C).²

3.1 Facility Inventory

40 CFR 60.5015(a)(1) requires an inventory of existing SSI units, including those that have ceased operation but have not been dismantled. Originally four wastewater treatment facilities were located in Georgia. All except for four units at two facilities have been properly shut down. The inventory of units by facility and location is presented in Table 3-1. The table also includes the current operating permits for the respective units, dates that their operation was first permitted, and operating status. Table 3-2 presents design and operating characteristics, as available, for the existing SSI units.

All units that are included in Georgia's inventory must comply with Georgia's Rule (www) and meet the requirements that are outlined in this plan. If a facility no longer intends to operate an SSI unit, the unit may be removed from the State's inventory if the State determines that it is inoperable. A unit may be demonstrated to be inoperable by meeting one or more of the following criteria:

- Waste charge door welded shut
- Stack and bypass stack removed
- Combustion air blowers removed
- Burners or fuel supply removed

These criteria are based on Section 3.3.1 of EPA document EPA-453/B-10-001: "Hospital/Medical/Infectious Waste Incinerators: Summary of Requirements for Revised or New Section 111(d)/129 State Plans Following Amendments for the Emission Guidelines", dated October 2010.

A facility must request and receive written concurrence of removal from the inventory from Georgia EPD. The request must be made in writing to Branch Chief, Air Protection Branch, Environmental Protection Division, Georgia Department of Natural Resources, 4244 International Parkway, Suite 120, Atlanta, Georgia 30354. The facility should allow 45 days from the date of request for a written response from EPD. EPD will remove the unit from the inventory only if one or more of the inoperability criteria have been met and the facility has also submitted a permit application requesting that the unit be removed from the facility's

² Georgia's Air Planning Agreement is an annual report demonstrating Georgia's ability to meet its commitments with EPA.

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operating permit. The official inventory will be updated as required and reported according to Georgia's Air Planning Agreement. For INC3 and INC4 at the R.L. Sutton Water Reclamation Facility, both units are not in operation, but the facility has not indicated that the units are inoperable, thus remaining in the facility inventory.

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Table 3-1. Existing Sewage Sludge Incineration Units – Inventory³

Facility	AIRS No.	City (County)	No. of SSI Units	Most Recent Air Permit No. (Water Permit No. ⁴)	Title V Permit ?	Start of Permitted Operation of SSI Unit	Operating Status
R.M. Clayton	04-13-121-00268	Atlanta (Fulton)	2	4952-121-0268-V-3-0 (GA0039012)	yes	11-07-1977	Operating
R.L. Sutton	04-13-067-00018	Smyrna (Cobb)	2	4952-067-0018-V-03-0 (GA0026140)	yes	06-02-2005	Permit revoked 2/20/2017

Table 3-2. Existing Sewage Sludge Incineration Units – Characteristics⁵

Facility	Unit ID	Type	Capacity (dry tons /hour)	Sludge/year in dry tons (year of record)	Auxiliary fuels burned	Air Pollution Control (per air permit)
R.M. Clayton	INC1	Multiple hearth	2.25	12,130 (2018) ⁶	Natural gas, digester gas	Multi-Stage Impingement Scrubber with Venturi Scrubber
	INC2	Multiple hearth	2.25	7,793 (2018) ⁶	Natural gas, digester gas	Multi-Stage Impingement Scrubber with Venturi Scrubber
R.L. Sutton	INC3	Fluidized bed	2.21	2,557 (2016) ⁷	Natural gas, fuel oil for backup	Venturi Scrubber/ Impingement Scrubber
	INC4	Fluidized bed	2.21	0 (2016)	Natural gas, fuel oil for backup	Venturi Scrubber/ Impingement Scrubber

³ Air permit data for Table 3-1 obtained from Permit Numbers 4952-121-0268-V-01-0, 4952-121-0268-V-3-0, 4952-067-0018-V-01-1, and 4952-067-0018-V-03-0.

⁴ Current Wastewater Permit Numbers were found on the Watershed Protection Branch website.

⁵ Air permit data for Table 3-2 obtained from Permit Numbers 4952-121-0268-V-3-0 and 4952-067-0018-V-03-0.

⁶ R.M. Clayton (Email Correspondence, March 26, 2019)

⁷ R.L. Sutton First and Second Semiannual 2016 Reports, INC4 was not used in 2016; In 2015, using a ratio of hours operated applied to the total dry sludge charge, INC3 burned 5,049 dry tpy and INC4 burned 6,613 dry tpy, assuming charge rate is uniform for each unit. The data for this estimation was derived from the First and Second Semiannual 2015 Reports.

3.2 Emission Inventory

40 CFR 60.5015(a)(2) requires emission inventories, in the units of the standard, for each of the designated pollutants. These inventories are developed on a unit-by-unit basis using methods that ensure accurate and up-to-date emission data. Only operating units are included in the emission inventory. For units INC1 and INC2 at R.M. Clayton, EPD examined three methods in order to develop the required inventories:

- AP-42 Basis – AP-42 emission factors from Chapter 2.2, “Sewage Sludge Incineration”, dated January 1995
- EPA Basis⁸ – estimation of baseline emissions from existing SSI units
- Performance Test Basis – historical test data

Using the “AP-42 Basis”, several disadvantages to using these factors are evident: they are not expressed in (and not readily convertible to) the units of the SSI emission limits, the majority of them are E-rated (low degree of confidence), and their associated control scenarios do not closely match the controls used with Georgia’s SSI units. The “EPA Basis” method adds several layers of uncertainty because it is an estimation from nationwide baseline emissions based on average test results from a select group of non-Georgia facilities and assumes sludge characteristics, emission controls, and standard control efficiencies that may not match those associated with Georgia’s SSI units. Therefore, the “AP-42 Basis” and “EPA basis” methods are not included with the State Plan.

The “Performance Test Basis” method is the most accurate method to develop the required emission inventory because it is based on EPD’s records of performance tests conducted at the facility to satisfy air permit requirements. Tests were performed on INC1 and INC2 in 2015 and 2017. A summary of the test data from the most recent test in 2017 is presented in Table 3-3, with all test results converted to the units of the MMMM standard. Under the “Performance Test Basis” method, all pollutants have been tested and the data shows that all emissions are compliant with the federal emission guidelines.

⁸ Eastern Research Group, Inc., “Revised Estimation of Baseline Emissions from Existing Sewage Sludge Incineration Units,” memo to Amy Hambrick, USEPA, January 2011 (docket EPA-HQ-OAR-2009-0559-0154)

Table 3-3. Performance Test Results for Selected Pollutants

Pollutant	Units of Measurement (at 7% O₂)	Emission Guideline Subpart M MMM Limit Mult. Hearth	Tested Emissions R.M. Clayton INC1	Tested Emissions R.M. Clayton INC2
particulate matter (PM)	mg/dscm	80	17.1	10.6
hydrogen chloride (HCl)	ppmvd	1.2	0.593	<0.05
carbon monoxide (CO)	ppmvd	3,800	159	166
dioxins/furans (total mass)	ng/dscm	5.0	0.0971	0.0396
dioxins/furans (TEQ)	ng/dscm	0.32	0.00894	0.00678
mercury (Hg)	mg/dscm	0.28	0.03	0.0326
oxides of nitrogen (NO _x)	ppmvd	220	104	83
sulfur dioxide (SO ₂)	ppmvd	26	19.9	18.2
cadmium	mg/dscm	0.095	0.004	0.00248
lead	mg/dscm	0.30	0.01	0.00901

4.0 Model Rule

As part of the 40 CFR part 60, subpart M MMM regulation, EPA has provided a model rule in sections 60.5085 through 60.5250. The model rule addresses the regulatory requirements applicable to SSI units. Specifically, it addresses the following components:

- Compliance schedules and increments of progress;
- Emission limits, emission standards, operator training and qualification requirements, and operating limits; and
- Performance testing, recordkeeping, and reporting requirements.

States are free to adopt the model rule or portions of it, or they may formulate their own regulations as long as they are not less stringent than the model rule. Georgia has adopted the model rule with the exception of the performance testing, recordkeeping, and reporting requirements. These requirements are addressed in Sections 2.130.2 through 2.130.4 of the Georgia EPD Air Branch's PTM.

5.0 Operator Training and Qualification

40 CFR part 60, subpart M MMM requires existing SSI units to be operated by trained and qualified operators. Incinerator operators are required to complete both initial and annual refresher training. The initial training must include, at a minimum, the following topics:

- Environmental concerns, including types of emissions and SSI emission limits under Georgia Rule 391-3-1-.02(www);
- Basic combustion principles, including products of combustion;
- Operation of the facility's specific type(s) of incinerator(s), including startup and shutdown procedures and sewage sludge feeding procedures;
- Combustion controls and monitoring;
- Operation of the facility's specific type(s) of air pollution control equipment, if applicable, and factors affecting performance;
- Inspection and maintenance of the incinerator and, if applicable, air pollution control devices;
- Actions to prevent malfunctions or to prevent conditions that may lead to malfunctions;
- Bottom and fly ash characteristics and handling procedures;
- Applicable Federal, State, and local regulations, including OSHA workplace standards;
- Pollution prevention; and
- Reporting and recordkeeping procedures.

In addition, the operator must take and pass an examination designed and administered per 40 CFR 60.5130(c)(2). The operator must be provided with written material covering the training topics that can be used as reference material.

To maintain operator qualification, annual refresher training is required. The training must include the following topics:

- Regulations update;
- Operation of the facility's specific type(s) of incinerator(s), including startup and shutdown procedures, sewage sludge feeding procedures, and ash handling procedures;
- Inspection and maintenance;
- Prevention of malfunctions or conditions that may lead to malfunctions; and
- Discussion of operating problems encountered by attendees.

Affected facilities must provide or arrange for the required training, including the training examination, for operators that they will designate as qualified operators. All training documentation must be retained by the facility and available upon request by Georgia EPD. Other elements of a facility's training and qualification program may require State approval at Georgia EPD's discretion.

6.0 Compliance Dates and Increments of Progress

40 CFR 60.5035 requires the state plan to include compliance schedules for SSI units. The intent is for facilities to demonstrate compliance as expeditiously as practicable after approval of the state plan. Achievement of compliance includes demonstration that a unit is meeting the emission limits and standards (see Section 2.2) and is also meeting operating limits and requirements. Compliance with the emission limits and standards may be demonstrated by (1) performance testing or (2) by the use of a continuous emission monitoring system (CEMS) or a continuous automated sampling system (reference 40 CFR 60.5185). Increments of progress as required by the model rule are as follows:

- Increment 1: submit a final control plan; and
- Increment 2: achieve final compliance.

The state plan must specify the compliance dates, but final compliance is required not later than March 21, 2016, or three years after state plan approval, whichever is earlier.

The federal plan will go into effect if a state does not have a federally approved state plan. The Federal Plan, 40 CFR part 62, subpart LLL also requires similar compliance schedules according to Table 1 of the rule and 40 CFR 62.15875.

To comply with the final compliance increment of progress, the owner/operator must complete all process changes and construction/retrofit of control devices. All process changes and air pollution control devices must operate as designed. According to Permit No. 4952-121-0268-V-02-1, no modifications were made to INC1 or INC2 at R.M. Clayton. Therefore, at the time of issuance increments of progress were not needed. INC1 and INC2 have achieved final compliance in accordance with 40 CFR 62.15875.

7.0 Performance Testing, Recordkeeping, and Reporting

Performance testing, monitoring, and calibration requirements are specified in 40 CFR 60.5220 and 60.5225, “Model Rule – Performance Testing, Monitoring, and Calibration Requirements”. In lieu of these requirements, Sections 2.130.2 and 2.130.3 of Georgia EPD’s PTM shall apply to each of Georgia’s existing SSI units. Recordkeeping and reporting requirements are specified in 40 CFR 60.5230 and 60.5235, “Model Rule – Recordkeeping and Reporting.” In lieu of these requirements, Section 2.130.4 of the PTM shall apply to each of Georgia’s existing SSI units. The PTM requirements are at least as protective as the Model Rule elements referenced above.

8.0 Operating Limits and Requirements

Operating limits and requirements for existing SSI units are specified in Section 2.130.2 of Georgia’s PTM. Section 2.130.2 implements the emission guidelines requirements of 40 CFR 60.5170 and 60.5175. Operators of SSI units must establish operating limits/requirements that include, but may not be limited to, the following:

- Combustion chamber operating temperature;
- Fugitive emissions from ash handling;
- Sludge feed rate and moisture content;
- Wet scrubber operation;
- Fabric filter operation;
- Electrostatic precipitator operation;
- Activated carbon injection; and
- Afterburner operating temperature.

If a device or method other than those listed above is used to control emissions, the facility must establish appropriate operating limits for such device or method as required by Section 2.130.2 of the PTM.

9.0 State Progress Reports

40 CFR 60.5015(a)(7) and 40 CFR 60.25(e) require the State to submit progress reports on plan enforcement to the EPA on an annual basis. The reporting period is the calendar year. The first report must cover the first full calendar year after approval of the state plan. Each progress report must include:

- Enforcement actions taken against designated facilities;
- Identification of the achievement of any increment of progress;
- Identification of designated facilities that have ceased operation;
- Emission inventory data for designated facilities that were not in operation at the time of plan development but began operation during the reporting period;
- Submission of additional data as necessary to update the original plan or to update information reported in previous progress reports; and

- Copies of technical reports on all performance testing complete with concurrently recorded process data.

All required items will be reported as previously agreed in Georgia's Air Planning Agreement (see Appendix C).

10.0 Title V Permits

Georgia's Rule (www) requires each owner or operator of an existing SSI unit whose operation is not permitted in a Title V permit to submit a Title V application for the subject unit's operation. The application must be submitted to the Division no later than the approval date of the Georgia State Plan by the EPA. Those facilities that have Title V permitted SSI units which need to add air pollution controls to comply with the emission limits will need to submit Title V applications for the controls. These applications must be submitted in time to obtain a final permit modification prior to the compliance date for the SSI emission guidelines. The permits of facilities that have Title V permits but do not need to add controls will be amended to address the SSI emission guidelines in accordance with the typical practice of EPD's Stationary Source Permitting Program. Table 3-1 shows which facilities have Title V permits as of the cover date of this plan.

11.0 Other Plan Requirements

Other plan requirements include:

- Documentation of public notification and participation
- Identification of enforceable state mechanisms for implementing the emission guidelines
- Demonstration of the State's legal authority to carry out the plan

These requirements are addressed in this section.

11.1 Documentation of Public Notification and Participation

Public notice of changes to Georgia Rule (www) and the opportunity to comment on the changes was posted on November 8, 2017. A public hearing on the incorporation of SSI requirements into the Georgia Rules for Air Quality Control was held at 2:00 p.m. on December 11, 2017, at the Environmental Protection Division Training Center, Atlanta Tradeport, 4244 International Parkway, Suite 116, Atlanta, GA 30354. No comments were received from the public.

On February 28, 2019, EPA provided comments for EPD to address prior to releasing the prehearing draft to the public. These changes necessitated additional changes to the "Procedures for Testing and Monitoring Sources of Air Pollutants" to reflect revised testing and monitoring requirements for SSI units to provide consistency between 2.130.3(a) and 2.130.4(f). Georgia Rule 391-3-1-.01(nnnn) required a date update to capture the change. The public notice and the opportunity to comment on these changes was posted as a part of

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Georgia's Miscellaneous Rule Package on May 23, 2019. A public hearing on the Miscellaneous Rule changes of the Georgia Rules for Air Quality Control was held at 2:00 p.m. on June 25, 2019, at the Environmental Protection Division Training Center, Atlanta Tradeport, 4244 International Parkway, Suite 116, Atlanta, GA 30354. No comments were received from the public.

Public notice of the proposed State Plan and the opportunity to comment on it was posted on October 28, 2019. A public hearing on the State Plan was held at 1:30 p.m. on December 2, 2019, at the Environmental Protection Division Training Center, Atlanta Tradeport, 4244 International Parkway, Suite 116, Atlanta, GA 30354.

11.2 Identification of enforceable state mechanisms for implementing the emission guidelines

40 CFR part 60, subpart Mmmm *Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units* was adopted as Rule 391-3-1-.02(2)(www) of the Georgia Rules for Air Quality Control. The rule became effective on March 28, 2018.

11.3 Demonstration of the State's legal authority to carry out the plan

In Appendix D, Georgia EPD demonstrates that it has adequate legal authority to carry out all aspects of Georgia's State Plan to implement and enforce the Emissions Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units codified at 40 CFR Part 60, Subpart Mmmm.

12.0 Plan Revisions by the State

Requirements for plan revisions by the State are addressed in 40 CFR 60.28. A revision of the plan is subject to public hearing (40 CFR 60.23(c)) and to approval by U.S. EPA (40 CFR 60.28(c)).