

The Coca-Cola Company

BEVERAGE BASE PLANT
ATLANTA, GEORGIA

September 10, 2018

Mr. Eric Cornwell
SSPP Manager, Air Protection Branch
Georgia Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

ADDRESS REPLY TO
1001 GREAT SOUTHWEST PARKWAY
ATLANTA, GA 30336
404 676-1300

RE: SIP Construction Permit Application (Amendment No. 2086-121-0703-B-01-1)

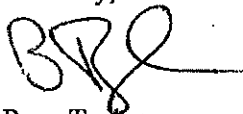
Dear Mr. Cornwell,

The Coca-Cola Company's Atlanta Beverage Base Plant (BBP) hereby submits a SIP air construction permit application for the installation of a 16.5 MMBtu/hr natural gas-fired boiler. This boiler will replace an existing 10.5 MMBtu/hr boiler which is currently permitted under the above referenced permit amendment. Enclosed are GA SIP Application Forms 1.0, 2.0, 2.01 and 4.0. Also enclosed is "GA EPD Expedited Permitted Program -Application for Entry to Program for Air Permits" which allows BBP to request expedited processing of this permit application. Please make note of the following points in reference to this permit application:

- 1) BBP is a true minor source of air pollutants and currently has two boilers (16.5 MMBtu/hr and 10.5 MMBtu/hr) both permitted under Permit No. 2086-121-0703-B-01-1.
- 2) To allow for operational flexibility, we intend to replace the smaller of the two boilers (Source Code B002) with a 16.5 MMBtu boiler (Proposed Source Code B004).
- 3) Since BBP is a true minor source for all air pollutants, we are requesting exemption from Generally Achievable Control Technology (GACT) under 40 CFR 63 Subpart JJJJJ.
- 4) The new boiler (B004) will be identical to boiler source code B003 that is permitted in the above-referenced existing permit.
- 5) The new boiler (B004) will use natural gas as the primary fuel. In the event of a natural gas curtailment, #2 fuel oil will be used as a backup fuel. BBP requests that the revised permit allows for the use of diesel during natural gas curtailment periods without any restriction on operational hours.
- 6) To allow for operational flexibility, BBP requests that the tune-up requirement for both boilers be adjusted to once, per boiler, per calendar year, anytime during the months of January through May.
- 7) Per your communication with Ms Butala, a separate meeting to request expedited processing is not required.

Should you have any questions or need any additional information, please contact Reshmi Butala, ABBP Environmental Manager, at (470) 233-0196 or via email at rbutala@coca-cola.com; or Chris Cherven, Engineering Manager at (404) 548-9508 or via email at ccherven@coca-cola.com

Sincerely,



Ryan Taylor
ABBP General Manager

Attachments



SIP AIR PERMIT APPLICATION

EPD Use Only

Date Received: _____

Application No. _____

FORM 1.00: GENERAL INFORMATION

1. Facility Information

Facility Name: Coca Cola Beverage Base Plant
AIRS No. (if known): 12100703
Facility Location: Street: 1001 Great Southwest Parkway
City: Atlanta Georgia Zip: GA County: Fulton
Is this facility a "small business" as defined in the instructions? Yes: No:

2. Facility Coordinates

Latitude: 33° 44' 5.294" NORTH Longitude: 84° 34' 10.196" WEST
UTM Coordinates: EAST NORTH ZONE

3. Facility Owner

Name of Owner: The Coca-Cola Company
Owner Address Street: One Coca Cola Plaza
City: Atlanta State: GA Zip: 30313

4. Permitting Contact and Mailing Address

Contact Person: Reshmi Butala Title: Environmental Manager
Telephone No.: 470-233-0196 Ext. Fax No.:
Email Address: rbutala@coca-cola.com
Mailing Address: Same as: Facility Location: Owner Address: Other:
If Other: Street Address:
City: State: Zip:

5. Authorized Official

Name: Ryan Taylor Title: Plant Manager
Address of Official Street: 1001 Great Southwest Parkway
City: Atlanta State: GA Zip: 30336

This application is submitted in accordance with the provisions of the Georgia Rules for Air Quality Control and, to the best of my knowledge, is complete and correct.

Signature:  Date: 9/10/18

6. Reason for Application: (Check all that apply)

- New Facility (to be constructed) Revision of Data Submitted in an Earlier Application
 Existing Facility (initial or modification application) Application No.: _____
 Permit to Construct Date of Original Submittal: _____
 Permit to Operate
 Change of Location
 Permit to Modify Existing Equipment: Affected Permit No.: _____

7. Permitting Exemption Activities (for permitted facilities only):

Have any exempt modifications based on emission level per Georgia Rule 391-3-1-.03(6)(l)(3) been performed at the facility that have not been previously incorporated in a permit?

- No Yes, please fill out the SIP Exemption Attachment (See Instructions for the attachment download)

8. Has assistance been provided to you for any part of this application?

- No Yes, SBAP Yes, a consultant has been employed or will be employed.

If yes, please provide the following information:

Name of Consulting Company: _____
 Name of Contact: _____
 Telephone No.: _____ Fax No.: _____
 Email Address: _____
 Mailing Address: Street: _____
 City: _____ State: _____ Zip: _____

Describe the Consultant's Involvement:

9. Submitted Application Forms: Select only the necessary forms for the facility application that will be submitted.

No. of Forms	Form
1	2.00 Emission Unit List
1	2.01 Boilers and Fuel Burning Equipment
	2.02 Storage Tank Physical Data
	2.03 Printing Operations
	2.04 Surface Coating Operations
	2.05 Waste Incinerators (solid/liquid waste destruction)
	2.06 Manufacturing and Operational Data
	3.00 Air Pollution Control Devices (APCD)
	3.01 Scrubbers
	3.02 Baghouses & Other Filter Collectors
	3.03 Electrostatic Precipitators
1	4.00 Emissions Data
	5.00 Monitoring Information
	6.00 Fugitive Emission Sources
	7.00 Air Modeling Information

10. Construction or Modification Date

Estimated Start Date: October 2018

11. If confidential information is being submitted in this application, were the guidelines followed in the "Procedures for Requesting that Submitted Information be treated as Confidential"?

No Yes

12. New Facility Emissions Summary

Criteria Pollutant	New Facility	
	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)	2.67	1.99
Nitrogen oxides (NOx)	7.85	1.86
Particulate Matter (PM) (filterable only)	1.96	0.19
PM <10 microns (PM10)	1.62	0.397
PM <2.5 microns (PM2.5)	1.62	0.397
Sulfur dioxide (SO ₂)	2.7	0.03
Volatile Organic Compounds (VOC)	0.25	0.19
Greenhouse Gases (GHGs) (in CO ₂ e)	11,426	6,304
Total Hazardous Air Pollutants (HAPs)	N/A	N/A
Individual HAPs Listed Below:		

13. Existing Facility Emissions Summary

Criteria Pollutant	Current Facility		After Modification	
	Potential (tpy)	Actual (tpy)	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)	6.54	4.89	5.35	3.99
Nitrogen oxides (NOx)	12.45	5.31	15.7	3.73
Particulate Matter (PM) (filterable only)	2.31	0.460	3.92	0.396
PM <10 microns (PM10)	1.88	0.59	3.23	0.794
PM <2.5 microns (PM2.5)	1.7	0.463	3.23	0.794
Sulfur dioxide (SO ₂)	2.7	0.38	5.4	0.06
Volatile Organic Compounds (VOC)	0.51	0.44	0.51	0.38
Greenhouse Gases (GHGs) (in CO ₂ e)	16,945	10,443	22,853	12,608
Total Hazardous Air Pollutants (HAPs)	N/A	N/A	N/A	N/A
Individual HAPs Listed Below:				

14. 4-Digit Facility Identification Code:

SIC Code: 31193 SIC Description: Manufacture of soft drink beverages

NAICS Code: _____ NAICS Description: _____

15. Description of general production process and operation for which a permit is being requested. If necessary, attach additional sheets to give an adequate description. Include layout drawings, as necessary, to describe each process. References should be made to source codes used in the application.

Replacement of 10.5 MMBtu/hr natural gas fired boiler (EU B001) with 16.5 MMBtu natural gas fired boiler. #2 Fuel oil will be a back-up fuel in the event of a natural gas shortage.

16. Additional information provided in attachments as listed below:

- Attachment A - _____
- Attachment B - _____
- Attachment C - _____
- Attachment D - _____
- Attachment E - _____
- Attachment F - _____

17. Additional Information: Unless previously submitted, include the following two items:

- Plot plan/map of facility location or date of previous submittal: Refer to SIP permit application dt. 1993
- Flow Diagram or date of previous submittal: Refer to SIP permit application dt. 1993

18. Other Environmental Permitting Needs:

Will this facility/modification trigger the need for environmental permits/approvals (other than air) such as Hazardous Waste Generation, Solid Waste Handling, Water withdrawal, water discharge, SWPPP, mining, landfill, etc.?

- No Yes, please list below:

Facility Name: Coca Cola Beverage Base Plant Date of Application: August 2018

FORM 2.00 – EMISSION UNIT LIST

Emission Unit ID	Name	Manufacturer and Model Number	Description
B004	Boiler No. 3	Cleaver Brooks CBLE-200-400-150ST Steam Boiler	Natural gas-fired boiler

Facility Name: Coca Cola Beverage Base Plant

Date of Application: August 2018

FORM 2.01 - BOILERS AND FUEL BURNING EQUIPMENT

Emission Unit ID	Type of Burner	Type of Draft	Design Capacity of Unit (MMBtu/hr Input)	Percent Excess Air	Dates		Date & Description of Last Modification
					Construction	Installation	
B004	Low NOX		16.3	15	October 2018	N/A	N/A

¹ This column does not have to be completed for natural gas only fired equipment.

Facility Name: Coca Cola Beverage Base Plant

Date of Application: August 2018

FUEL DATA

Emission Unit ID	Fuel Type	Potential Annual Consumption		Percent Use by Season		Hourly Consumption		Heat Content		Percent Sulfur		Percent Ash in Solid Fuel	
		Total Quantity	Units	Ozone Season May 1 - Sept 30	Non-ozone Season Oct 1 - Apr 30	Max	Avg	Min	Avg	Max	Avg	Max	Avg
B004	Natural Gas	746	lb/hr	50	50	746 lb/hr	467 lb/hr	1000 Btu/scf	1000 Btu/scf	N/A	N/A	N/A	N/A
B004	No.2 Fuel Oil (to be used only during natural gas curtailment)	100	gal/hr	N/A	N/A	100 gal/hr	N/A			0.5	N/A	0.01	N/A

Fuel Type	Name of Supplier	Phone Number	Supplier Location			
			Address	City	State	Zip
Natural Gas	Atlanta Gas Light Company	877.427.4321				

Facility Name: Coca Cola Beverage Base Plant

Date of Application: August 2018

FORM 4.00 – EMISSION INFORMATION

Emission Unit ID	Air Pollution Control Device ID	Stack ID	Pollutant Emitted	Emission Rates					Method of Determination
				Hourly Actual Emissions (lb/hr)	Hourly Potential Emissions (lb/hr)	Actual Annual Emission (tpy)	Potential Annual Emission (tpy)		
B004	N/A	B004	CO	0.46	0.61	1.99	2.67	Manufacturer data	
B004	N/A	B004	NOX	0.43	0.57	1.87	7.85	Manufacturer data	
B004	N/A	B004	SO2	0.007	0.009	0.03	2.7	Manufacturer data	
B004	N/A	B004	VOC	0.043	0.058	0.19	0.25	Manufacturer data	
B004	N/A	B004	PM10 (filterable)	0.068	0.03	0.13	0.98	Manufacturer data	
B004	N/A	B004	PM10 (condensable)	0.068	0.09	0.39	0.63	Manufacturer data	
B004	N/A	B004	PM2.5 (filterable)	0.068	0.03	0.13	0.98	Manufacturer data	
B004	N/A	B004	PM2.5 (condensable)	0.068	0.09	0.39	0.63	Manufacturer data	

BOILER EMISSIONS AFTER PROPOSED CHANGES									
Criteria Pollutant Emissions									
B003 (existing boiler) 16.5 MMBtu/hr, maximum heat input capacity. Fuel use: Natural Gas = 1000 Btu/scf. Fuel Oil = 149,159 Btu/gal									
B004 (new boiler) 16.5 MMBtu/hr, maximum heat input capacity. Fuel use: Natural Gas = 1000 Btu/scf. Fuel Oil = 149,159 Btu/gal									
TABLE 1: FACILITY-WIDE BOILER CRITERIA POLLUTANT EMISSIONS AS REPORTED ON SIP FORM 100, Section 12									
Pollutant ⁽¹⁾	NG-EF 10-100 MMBTU lb/MMBtu	Facility-wide Actual emissions per Boiler ⁽²⁾		Total Actual Facility-wide emissions with Proposed Installation	Facility wide Maximum Potential emissions after Proposed Installation ⁽⁵⁾		Maximum Potential Facility-wide emissions after Proposed Installation	Total	
		B003 (existing) tpy	B004 (new) tpy		B003 (existing) Max tpy	B004 (new) Max tpy		B003 & B004 Max tpy	B003 & B004 tpy
PM filterable (includes PM10 and PM2.5)	Emissions data from mfg	0.198	0.198	0.396	1.960	1.960	3.92		
PM ₁₀ (filterable + condensable)	Emissions data from mfg	0.397	0.397	0.794	1.617	1.617	3.23		
PM _{2.5} (filterable + condensable)	Emissions data from mfg	0.397	0.397	0.794	1.617	1.617	3.23		
SO ₂ ⁽⁴⁾	Emissions data from mfg	0.030	0.030	0.060	2.700	2.700	5.40		
NOx	Emissions data from mfg	1.865	1.865	3.730	7.852	7.852	15.70		
VOC	Emissions data from mfg	0.190	0.190	0.380	0.254	0.254	0.51		
CO	Emissions data from mfg	1.998	1.998	3.996	2.674	2.674	5.35		
CO ₂ ⁽⁴⁾	116.31	6,304.29	6,304.29	12,608.59	11,426.61	11,426.61	22,853.22		

1) Pollutant emissions provided by manufacturer.
2) Potential SO2 emissions based on usage of #2 Fuel oil at 0.5% S by weight, vendor provided emission rate of 7.497 lb/hr and 720 hours of operation per year. #2 fuel oil is a backup fuel. The facility has not used #2 fuel oil for the last 5 years at a minimum.
3) Actual emissions based on estimated 6,570 hours of operation per year.
4) Actual CO2 emissions based on estimated 6,570 hours of operation per year using natural gas and emission factor of 116.31 lb/MMBtu provided by boiler manufacturer. Potential CO2 emissions based on 8,760 hours of operation using CO2 emission factor of 158.11 lb/MMBtu for #2 Fuel oil. Emission factor data provided by Boiler manufacturer.
5) Potential emissions of PM and NOx emissions based on usage of #2 fuel oil.

EXISTING BOILER EMISSIONS									
Criteria Pollutant Emissions								MMscf/yr	
B002 (existing boiler) 10.5 MMBtu/hr, maximum heat input capacity. Fuel use: Natural Gas = 1000 Btu/scf. Fuel Oil = 149,159 Btu/gal								0.0105	
B003 (existing boiler) 16.5 MMBtu/hr, maximum heat input capacity. Fuel use: Natural Gas = 1000 Btu/scf. Fuel Oil = 149,159 Btu/gal								0.0165	
TABLE 2: FACILITY-WIDE BOILER CRITERIA POLLUTANT EMISSIONS AS REPORTED ON SIP FORM 100, Section 13									
Pollutant (1) (2)	NG/EF 10-100 MMBtu lb/MMscf	Facility-wide Actual emissions		Total Actual Facility-wide emissions		Facility wide Maximum Potential emissions		Total Maximum Potential Facility-wide emissions for current facility	
		B002 tpy	B003 tpy	B002 & B003 tpy	B002 tpy	B003 tpy	B002 & B003 tpy	B002 & B003 tpy	
PM Total	7.6	0.262	0.198	0.460	0.350	1.960	2.31		
PM ₁₀	5.7	0.197	0.397	0.594	0.262	1.617	1.88		
PM _{2.5}	1.9	0.066	0.397	0.463	0.087	1.617	1.70		
SO ₂	0.6	0.021	0.030	0.051	0.028	2.700	2.73		
NOx	100	3.449	1.865	5.314	4.599	7.852	12.45		
VOC	5.5	0.190	0.190	0.380	0.253	0.254	0.51		
CO	84	2.897	1.998	4.895	3.863	2.674	6.54		
CO ₂ (3)	120000	4139.100	6,304.29	10,443.39	5518.800	11,426.61	16945.41		
1) Pollutant emissions for B003 provided by manufacturer. Emissions for B002 based on US-EPA AP42 emission factors for natural gas combustion.									
2) Actual emissions based on estimated 6,570 hours of operation per year.									

