

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Judson H. Turner, Director

NARRATIVE

TO: David Matos

FROM: Chan Spraley

DATE: October 30, 2014

Facility Name: **Sterigenics U.S. LLC**
AIRS No.: 067-00093
Location: Atlanta, GA (Cobb County)
Application #: 22691
Date of Application: June 25, 2014

Background Information

Sterigenics U.S. LLC (“Sterigenics”) is permitted as an ethylene oxide and propylene oxide sterilization facility located at 2973 Olympic Industrial Park, Atlanta, Georgia (Cobb County). The facility operates under Permit No. 7389-067-0093-S-05-0, issued May 27, 2014. The facility is subject to 40 CFR 63 Subpart O – “Ethylene Oxide Emission Standards for Sterilization Facilities.” The facility was re-classified from Title V to Synthetic Minor with the most current permit.

Purpose of Application

Sterigenics submitted Application No. 22691, dated June 25, 2014, for a change of address notification and a boiler replacement notification. The facility located at 2973 Olympic Industrial Drive was notified on June 24, 2014 by the United State Postal Service that the facility city and zip code changed as of July 1, 2014 to: Atlanta, GA 30339. The facility also requires a new boiler, which is larger than the existing boiler and more efficient. The new replacement boiler is a 3.35 MMBtu/hr boiler that only burns natural gas. Liquid fuels will only be burned during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Emissions Summary

Potential emissions will not change. Actual emissions decreased because the new boiler is more efficient.

Regulatory Applicability

The proposed address change and replacement boiler will not trigger applicability to any State or Federal Air Quality Rules.

In accordance with *Georgia Rules for Air Quality Control*, Chapter 391-3-1-.03, section (6) thereof relating to "Exemptions", the proposed boiler does not require an Air Quality Permit in accordance with Georgia Rule 391-3-1-.03(6)(b)1. Georgia Rule 391-3-1-.03(6)(b)1 states that fuel-burning equipment having a total heat input capacity of less than 10 MMBtu/hr burning only natural gas, LPG and/or distillate fuel oil containing 0.50% sulfur by weight or less are exempt from permitting.

The new proposed 3.35 MMBtu/hr replacement boiler meets the definition of *gas-fired boiler* as defined in 40 CFR 63.11237, and is therefore exempt from the Boiler GACT requirements.

Toxic Impact Assessment

A new toxic impact assessment is not required for this permitting action.

Summary & Recommendations

I recommend issuing Air Quality Permit Amendment No. 7389-067-0093-S-05-1 to Sterigenics for the change in address and the replacement of an existing boiler with a more efficient 3.35 MMBtu/hr natural gas fired boiler. No public advisory for this application was necessary because the proposed boiler is exempt from permitting. All information contained in the submitted application will be kept on file for future reference.