

ENVIRONMENTAL PROTECTION DIVISION

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NARRATIVE

FROM:

TO: Jeng-Hon Su

DATE: February 3, 2022

S. Ganapathy

Facility Name: Spectrum Energy Georgia, LLC

AIRS No.: 075-00028

Location: Adel, GA (Cook County)

Application #: 28143

Date of Application: October 6, 2021

Background Information

On October 6, 2021, Spectrum Energy Georgia, LLC's (hereinafter "facility") consultant, Mr. Todd Cloud, submitted a SIP permit application (assigned Application No. 28143) to EPD for the construction and operation of a greenfield wood pellet manufacturing facility located at 801 Cook Street, Adel, Georgia 31620 (Cook County). Based on potential emissions, the proposed facility will be a "major" source with respect to the Title V operating permit program and an "area" source with respect to the National Emission Standards for Hazardous air Pollutants (NESHAP) program. According to the application, the potential-to-emit (PTE) for nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOC), and particulate matter (PM/PM₁₀/PM_{2.5}) will be greater than 100 tons per year (tpy), each. Application No. 28143 is submitted for a E permit, which is a SIP permit that allows the construction and operation of the facility and will require the submittal of a Title V operation permit application.

In order to avoid triggering a PSD review, the facility requested in Application No. 28143 that facility-wide emissions for each of NOx, CO, VOC, and Total PM be capped below 250 tpy. In order to be an area source for hazardous air pollutant (HAP) emissions and avoid being subject to any maximum available control technology (MACT) requirements, the facility also proposed to cap the facility-wide single and combined HAP emissions below 10 tpy and 25 tpy, respectively.

A Toxic Impact Assessment was done for the proposed pellet mill except for arsenic (As) and hexavalent chromium (Cr VI). A public advisory was issued for this permit application on October 20, 2021. The Permittee has proposed two phases for the project; the two phases will share some emission units, but will include different burners and dryers. Phase II also has more process equipment than Phase I.

The initial phase (Phase I) ends/sunsets at the start of the next phase (Phase II) of the project. The applicant requested both phases permitted at once.