

Summary & Recommendations

I recommend that Air Quality Permit No. 2499-075-0028-E-01-0 be issued to Spectrum Energy Georgia, LLC for construction and operation of pellet mill. When the Phase II starts, Phase I sunsets and terms and conditions pertaining to Phase I becomes null and void and are no longer effective.

A public advisory was issued for this permit application on October 20, 2021; comments are due by November 19, 2021. Comments were received from Environmental Integrity Project (EIP) and WWALS Watershed Coalition, Inc. Many of the comments are that the application does not include detailed information of the emission units and control devices, and the emission factors are questionable. As discussed previously, there is not much credible information available for pellet mill emission factors. And available data shows widely varying emission factors. The Division would accept all the emission factors provided by the applicant on one condition, that the facility must validate these emission factors in initial performance tests and subsequent testing. All the testing requirements are included in Section 6 of the permit.

Another major comment is that the PSD SM limits are set close to the PSD major source thresholds. This is a common practice for all industries requesting for SM limits. In order to ensure that these limits are not exceeded, the permit contains many record keeping requirements that the facility must closely track their actual emissions. In order to ensure the accuracy of the emission factors used in the tracking equations, the facility must either use a VOC CEMS or conduct periodic testing.

EPD's stationary source compliance program will be responsible for facility inspections and overall compliance oversight.