

industries. In addition, the Division does not have the authority to deny the application so long as all applicable federal and state rules are being met. The Division will thoroughly review the dust control plan submitted by the facility to ensure that the procedures for limiting fugitive dust are ~~suitably stringent~~ suitable and protect the surrounding community from any adverse effects of the lumber yard operations.

Another Public Advisory comment from 4C raised concerns about potential PM_{2.5} National Ambient Air Quality Standards (NAAQS) exceedances as the facility transitions from Phase I to Phase II.

EPD Response:

Since this modification does not trigger a Prevention of Significant Deterioration (PSD) review, the Division does not perform a NAAQS analysis which is a part of a PSD review.

Although Table 14 in the comment letter showed that the total PM_{2.5} maximum ground level concentration (MGLC) after Phase I would be very close to the associated NAAQS, the Division would like to point out that the background PM_{2.5} concentration was already greater than 80 percent of the associated NAAQS. In addition, the facility's consultant has informed the Division that their own NAAQS modeling results after Phase II would also comply with the associated NAAQS. The Division did not receive or review that modeling.

Since both Phase I and Phase II are subject to the PSD synthetic minor emission limits specified in Condition 2.1, no PSD review would be triggered, and no NAAQS assessment would be required. Unless it is clear to the Division that the NAAQS would be exceeded, the proposed modification ~~should will~~ not involve any a NAAQS assessment.

Another Public Advisory comment from 4C raised concerns about the inconsistencies among multiple sections of the application.

EPD Response:

In the application dated May 30, 2024, the facility mentioned three different scenarios of control devices and requested that the proposed permit amendment be flexible for these three scenarios. Note that the E-01-0 permit already contains different conditions for each of the two major phases. The Division denied the facility's request to permit multiple scenarios and ~~requested that required~~ the facility to select just one control device ~~option~~ scenario.

The facility selected the RTO and biofilter option and submitted the updated application on December 30, 2024. The Division summarized the list of emission units and associated control devices in the Table 1 of the narrative. The Division also included all the updated application emission factors for Phase I in the tables in Modified Conditions 7.8 through 7.14 of the proposed SIP-E permit amendment. The Division does not have any issues with any inconsistencies in the application.

The final comment from 4C requested that the Division account for environmental justice concerns in its application review process and deny the proposed modification accordingly.

EPD Response:

GA EPD takes seriously our responsibility for administering the Clean Air Act and Georgia Air Quality Act and incorporating principles of equity and fair treatment in our actions. We are committed to engaging with stakeholders and ensuring that citizens in overburdened communities have meaningful involvement in our decision-making process. GA EPD published a public advisory related to the facility on June 12, 2024, informing the public that it had received an application for the facility and inviting comments on that