PERMIT AMENDMENT NO. 4911-195-0020-E-01-3 ISSUANCE DATE: 2/5/2020



ENVIRONMENTAL PROTECTION DIVISION

Air Quality – Permit Amendment

In accordance with The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to or in effect under that Act, Permit No. 4911-195-0020-E-01-0 issued on October 28, 2015 to:

Facility Name:	GRP Madison Renewable Energy Facility, LLC
Facility Address:	125 H.V. Chandler Rd Colbert, Georgia 30628 Madison County
Mailing Address:	125 H.V. Chandler Rd Colbert, Georgia 30628 Madison County
Facility AIRS Number:	04-13-195-00020

for the following: Construction and operation of a 58 MW steam-turbine generator powered by steam from a 700 MMBtu/hr boiler (Source Code: B001) firing a combination of clean cellulosic biomass from clean construction and demolition wood, and small quantities of natural gas during startup and bed stabilization only; ancillary equipment includes a 350-kW emergency generator, a 250-hp fire pump, storage tanks and a cooling tower.

is hereby amended as follows: Usage of railroad ties as fuel in Boiler B001 is limited to 8.75 tons per hour and 20 percent of total heat input to coincide with the operating rates provided by the Permittee in Application No. 26986. Usage of railroad ties is prohibited during startups and planned shutdowns of Boiler B001.

Reason for Amendment: Application No. 27364 – Amendment for Cause letter dated December 19, 2019

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 pages.

This Permit Amendment is hereby made a part of Permit No. 4911-195-0020-E-01-0 and compliance herewith is hereby ordered. Except as amended hereby, the above referenced Permit remains in full force and effect.



[Signed]

Richard E. Dunn, Director Environmental Protection Division

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NEW CONDITIONS

2. Allowable Emissions

- 2.20 The Permittee shall limit the combustion of railroad tie-derived fuel in Boiler B001 to no greater than:
 - a. 8.75 tons per hour, on a daily basis; and
 - b. 20 percent of the total heat input, on a semiannual basis.

For the purposes of this permit amendment, railroad tie-derived fuel means any material from processing (in accordance with Condition 2.19) of creosote treated railroad ties, creosote-borate treated railroad ties, copper naphthenate treated railroad ties, or copper naphthenate-borate treated railroad ties. [391-3-1-.03(2)(c)]

2.21 The use of railroad tie-derived fuel in Boiler B001 is prohibited during times of startup and planned shutdown.

For the purposes of this permit condition, startup means the firing of fuel in the boiler after a shutdown event for any purpose. Startup ends when electricity is generated from the steam turbine and all air pollution control devices are at normal operating conditions. Shutdown begins when the boiler no longer generates electricity or when no fuel is being fed to the boiler, whichever is earlier. Shutdown ends when the boiler no longer generates electricity, and no fuel is being combusted in the boiler.

[391-3-1-.03(2)(c)]

5. Monitoring

- 5.10 The Permittee shall record the weight (in pounds) of the railroad tie-derived fuel added to the fuel mix area from the railroad tie-derived fuel pile for each Boiler operating day. This record shall be done by documenting the weight of a full load of railroad tie-derived fuel in the mover bucket and tracking the total buckets delivered from the railroad tie-derived fuel pile to the mixing area each day. These records shall be in a form suitable for inspection and/or submittal to the Division. An alternative method may be allowed pending written approval by Georgia EPD Air Protection Branch. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 5.11 The Permittee shall record the weight (in pounds) of the railroad tie-derived fuel delivered to the railroad tie-derived fuel pile for each operating day. This record shall be done by documenting the weight of a full load of railroad tie-derived fuel in the transport vehicle and tracking the total number of truckloads delivered to the pile. As an alternative, the Permittee may use a truck scale at the truck onloading station to determine the weight on each load. These records shall be in a form suitable for inspection and/or submittal to the Division. An alternative method may be allowed pending written approval by Georgia EPD Air Protection Branch. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]

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5.12 The Permittee shall record the hours of operation of Boiler B001 for each day. A day is a 24-hour period that starts at 12:00 midnight and ends the following midnight. These records shall be in a form suitable for inspection and/or submittal to the Division. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]

7. Notification, Reporting and Record Keeping Requirements

- 7.22 The Permittee shall, using the records required by Conditions 5.10 and 5.12, record the total amount of railroad tie-derived fuel delivered into Boiler B001 during each operating day. These records shall be in a form suitable for inspection and/or submittal to the Division. The Permittee shall notify the Division in writing if any daily total tons of railroad tie-derived fuel delivered into Boiler B001 exceeds a value equal to: [8.75 * hours of boiler operation] each day. This report shall be submitted within 30 days after the date of occurrence. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 7.23 The Permittee shall, using the records required by Condition 5.11, record the total amount of railroad tie-derived fuel delivered to the railroad tie-derived fuel pile each calendar month. These records shall be in a form suitable for inspection and/or submittal to the Division. The Permittee shall notify the Division in writing if any monthly total tons of railroad tie-derived fuel delivered to the railroad tie-derived fuel pile exceeds 6510 tons. This report shall be submitted within 30 days after the date of occurrence. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 7.24 The Permittee shall document each Boiler B001 startup, and shutdown, detailing the date and time of each event, and its duration in minutes. Furthermore, the Permittee shall identify all shutdowns as either planned or unplanned, and explain in writing why any shutdown is deemed unplanned. For each such startup event or shutdown event, the Permittee shall document in writing whether or not railroad tie-derived fuel was burned during said event. If railroad tie-derived fuel is burned during a startup or planned shutdown, the Permittee shall notify the Division in writing within 30 days after such occurrence.
 [391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 7.25 The Permittee shall include, as part of the submittal required by Condition 7.5, the ratio (by total heat content) of the railroad tie-derived fuel to the total fuel burned in Boiler B001 during the semiannual period. If the ratio exceeds 20%, the Permittee shall explain in writing how it intends to attain compliance with Condition 2.20 b. during the next semiannual period. [391-3-1-.02(3) and 391-3-1-.03(2)(c)]