

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

4244 International Parkway • Suite 120 • Atlanta • Georgia 30354

404/363-7000 • Fax: 404/363-7100

Noel Holcomb, Commissioner

Carol A. Couch, Ph. D., Director

JUL 24 2006

Jonathan Wallace
Sterilization Services of Georgia
6005 Boatrock Blvd.
Atlanta, Georgia 30336

Re: Title V Application No. TV-16785 dated 6/15/2006, submitted as an update to Application No. 16672
Sterilization Services of Georgia, Atlanta (Fulton County)
Request for a Synthetic Minor Permit in Accordance with 40 CFR 63.360(f)

Dear Mr. Wallace:

Enclosed please find Air Quality Permit No. 3841-121-0010-S-02-0 for the operation of an ethylene oxide sterilization facility at Sterilization Services of Georgia in Atlanta, Georgia. This permit is also issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V and Title III of the Clean Air Act Amendments of 1990.

Note that any future modifications that might affect potential emissions from your facility will require review and possible permitting through this office.

The following types of correspondence should be sent to the Division personnel indicated:

- Testing: Ross Winne – Program Manager, Industrial Source Monitoring Program
- Monitoring and Compliance (reports): Karen Hays - Unit Manager, Stationary Source Compliance Program.

Thank you for your cooperation. If you have any questions or need more information, please contact me at (404) 363-7044 or via email at beth_chalk@dnr.state.ga.us.

Sincerely,



Beth Anne Chalk
Environmental Engineer
Stationary Source Permitting Program

Enclosure

c: Ender Serefli, Cartersville



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch



AIR QUALITY PERMIT

Permit No.
3841-121-0010-S-02-0

Effective Date

JUL 24 2008

In accordance with the provisions of 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 and in effect under that Act,

Facility Name: **Sterilization Services of Georgia**

Mailing Address: 6005 Boatrock Boulevard
Atlanta, Georgia 30336

is issued a Permit for the following:

Operation of an ethylene oxide sterilization facility. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V and Title III of the Clean Air Act Amendments of 1990.

Facility Location: 6005 Boatrock Boulevard
Atlanta, Georgia 30336 (Fulton County)

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 16785 dated 6/15/2006; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 7 pages, which pages are a part of this Permit.

Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall comply with the applicable provisions of 40 CFR 63 Subpart O—“Ethylene Oxide Emissions Standards for Sterilization Facilities.”
- 2.2 The Permittee shall reduce ethylene oxide emissions to the atmosphere from each sterilization chamber vent by at least 99%.
[40 CFR 63.362(c) and 40 CFR 70 Avoidance for HAP and VOC]

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- 2.3 The Permittee shall reduce ethylene oxide emissions to the atmosphere from each aeration room vent to a maximum concentration of 1 ppmv, or by at least 99%, whichever is less stringent.
[40 CFR 63.362(d) and 40 CFR 70 Avoidance for HAP and VOC]
- 2.4 The emission limits in Condition Nos. 2.2 and 2.3 apply during sterilization operation. The emission limits do not apply during periods of malfunction.
[40 CFR 63.362(b)]
- 2.5 The Permittee shall not use more than 168 tons of ethylene oxide during any 12 consecutive month period.
[40 CFR 70 Avoidance for HAP and VOC]

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.
- 4.2 A spare parts inventory for control equipment shall be maintained by the Permittee. A list of such parts shall be submitted to the Division for approval upon request.
- 4.3 The Permittee shall comply with one of the work practice standards specified under 40 CFR 63.363(b)(4) for the Catalytic Oxidizer (APCD ID No. 1OX).

5. Monitoring

- 5.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

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- 5.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record oxidation temperature at the outlet of the catalyst bed for the Catalytic Oxidizer (APCD ID No. 1OX). The temperature monitor shall be accurate within ± 5.6 degrees Celsius (± 10 degrees Fahrenheit). Where such performance specification(s) exist, this system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[40 CFR 63.364(c)]
- 5.3 The Permittee shall verify the accuracy of the temperature monitor required by Condition No. 5.2 twice each calendar year with a reference temperature monitor (traceable to National Institute of Standards and Technology (NIST) standards or an independent temperature measurement device dedicated for this purpose). During accuracy checking, the probe of the reference device shall be at the same location as that of the temperature monitor being tested. As an alternative, the accuracy temperature monitor may be verified in a calibrated oven (traceable to NIST standards).
[40 CFR 63.364(c)(4)]
- 5.4 The Permittee shall measure and record the scrubber liquor level weekly in the recirculation tank for the Scrubber (APCD ID No. 1SC). The Permittee shall install, maintain, and use a liquid level indicator to measure the scrubber liquor tank level (i.e. a marker on the tank wall, a dipstick, a magnetic indicator, etc.).
[40 CFR 63.364(b)(2)]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days (or sixty (60) days for test required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

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- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
- 6.2 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Section 2 are as follows:
- a. Method 1 for sample point locations,
 - b. Method 2 for the determination of flow rate,
 - c. Method 3 for the determination of stack gas molecular weight,
 - d. Method 4 for the determination of stack moisture,
 - e. Method 5 for the determination of particulate matter,
 - f. Method 9 and the Procedures of Section 1.3 for the determination of the opacity of visual emissions,
 - g. Method 18 for the determination of the concentration of ethylene oxide,
Note: For Method 18 the integrated bag sampling procedures shall be used.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

- 6.3 If a performance test must be rescheduled due to unforeseeable circumstances beyond the Permittee's control, the Permittee shall notify the Division within 5 days prior to the scheduled date of the test and shall specify the date when the test is rescheduled.
[40 CFR 63.7(b)]
- 6.4 The Permittee shall submit a site-specific test plan along with the notification of intent to conduct a performance test.
[40 CFR 63.7(c)(2)]
- 6.5 The Permittee shall analyze performance audit samples during each performance test.
[40 CFR 63.7(c)(4)]
- 6.6 The Permittee shall provide performance testing facilities as specified in 40 CFR 63.7(d).

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- 6.7 Performance tests shall be conducted under conditions based on representative performance of the source and as otherwise specified in 40 CFR 63.7(e).
- 6.8 The Permittee shall submit the results of a performance test and notification of compliance status within 60 days following completion of the test.
[40 CFR 63.7(g), 63.9(h), 63.10(d) and 63.366(a)]
- 6.9 The Permittee shall determine compliance with the emission limits using procedures contained in 40 CFR 63.363(b), (c) and (d).
- 6.10 Within 90 days following the issuance of this permit, after the blanking off of two of the four beds of the Catalytic Oxidizer (APCD ID No. 10X), the Permittee shall conduct a performance test on the Catalytic Oxidizer for ethylene oxide emissions. The Permittee shall use the test methods specified under Condition 6.2 and the testing procedures under 40 CFR 63.365 to perform this test. The test shall be conducted under conditions representative of maximum normal ethylene oxide loading to the Catalytic Oxidizer. As part of the test result submittal required under Condition 6.1, the Permittee shall verify that the control device is complying with the reduction requirements of Condition 2.3 in accordance with one of the following options:
 - a. The Permittee shall verify that the control device is at least 99% effective or complies with the 1 ppmv standard at the current manufacturer's recommended minimum oxidation temperature, and shall verify the current oxidation temperature deviation value specified in Condition 7.4b, or
 - b. The Permittee shall verify that the control device is at least 99% effective or complies with the 1 ppmv standard at a new minimum oxidation temperature, and shall submit with the test result submittal the new oxidation temperature deviation value for the Division's approval.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment or any periods during which a continuous monitoring system or monitoring device is inoperative. The Permittee shall retain these records for a period of at least five (5) years after the date of any such startup, shutdown, or malfunction.

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- 7.2 In the event of any malfunction or breakdown of process or emission control equipment for a period of four hours or more which results in increased emissions, the owner or operator shall submit a written report which describes the cause of the breakdown, the corrective actions taken, and the plans to prevent future occurrences. This report must be submitted by means that would ensure the Division's receipt of the report by no later than seven days after the occurrence. The information submitted shall be adequate to allow the Division to determine if the increased emissions were due to a sudden and unavoidable breakdown. Such a report shall in no way serve to excuse, otherwise justify or in any manner affect any potential liability or enforcement action.
- 7.3 The Permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this Permit. The information shall be recorded in a permanent form suitable and available for inspection and shall be retained for at least five (5) years following the date of such measurements maintenance, reports, and records.
- 7.4 The Permittee shall submit written reports semiannually, divided monthly, in accordance with Section 1.4 of the Division's Procedure for Testing and Monitoring Sources of Air Pollutants, 40 CFR 63 Subpart O, and 40 CFR 63 Subpart A as appropriate, of all operating parameter deviations and all periods of monitoring system downtime for the following control device systems. Operating parameter deviations are defined as follows:
- a. Any reading of the scrubber liquor recirculation tank level for the Scrubber (APCD ID No. 1SC) that is above 9,200 gallons.
 - b. Any 24-hour average of the oxidation temperature for the Catalytic Oxidizer (APCD ID No. 1OX) that is either less than 269 degrees Fahrenheit or less than the oxidation temperature approved by the Division and established in accordance with Condition 6.10b.

For each operating parameter deviation and each period of monitoring system downtime, the Permittee shall record the time of occurrence, the nature, the cause, and the corrective action taken to address the deviation or system downtime.

- 7.5 The data acquisition system for the temperature monitor required by Condition 5.2 shall compute and record a daily average oxidation temperature from the 15-minute or shorter period temperature values. Strip chart data shall be converted to record a daily average oxidation temperature each day any instantaneous temperature recording falls below the minimum temperature.
[40 CFR 63.364(c)]
- 7.6 The Permittee shall abide by the recordkeeping provisions of 63.367(d) for the Catalytic Oxidizer (APCD ID No. 1OX).

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- 7.7 The Permittee shall maintain general records and CMS records as specified by 40 CFR 63.10(b)(2) and (c), respectively, and Table 1 of 40 CFR 63 Subpart O.
- 7.8 The Permittee shall maintain monthly records of the facility's ethylene oxide usage. At the end of each calendar month, these monthly records shall be used to calculate and record the twelve consecutive month total of the facility's ethylene oxide usage. These records shall be kept in a form suitable for inspection by or submittal to the Division for a period of five years following the date of record. The Permittee shall report to the Division any twelve consecutive month total that exceeds 168 tons of ethylene oxide usage by the 15th of the following calendar month.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."
- 8.3 Georgia Air Quality Permit No. 3841-121-0010-V-01-0 and all associated amendments are hereby revoked in their entirety.