

PERMIT NO. 5047-217-0075-B-01-0

ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

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: BD Global Distribution Center
Facility Address: 14201 Lochridge Boulevard
Covington, Georgia 30014 Newton County
Mailing Address: 14201 Lochridge Boulevard
Covington, Georgia 30014
Facility AIRS Number: 04-13-217-00075

is issued a Permit for the following:

Operation of a medical equipment storage and distribution warehouse, including the construction and operation of an indoor air capture system for the Product Storage Area (Source Code PSTR) controlled by Dry Bed System 1 (Source Code SYS1).

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. 27439 dated February 14, 2020 and revised March 11, 2021 and June 10, 2022; 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.



Jeffrey W. Cown, Director
Environmental Protection Division

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EQUIPMENT LIST

Emission Units		Associated Control Devices	
Source Code	Description	Source Code	Description
PSTR	Product Storage Area	SYS1	Dry Bed System 1

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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

Not applicable.

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.

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4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The records shall be retained for at least five (5) years following the date of such maintenance.
- 4.2 A spare parts inventory for control equipment shall be maintained by the Permittee.
- 4.3 Malfunctioning components of air pollution control systems shall be repaired as expeditiously as possible.
- 4.4 The Permittee shall route the air from the Product Storage Area (Source Code PSTR) to Dry Bed System 1 (Source Code SYS1). The Permittee shall only store ethylene oxide sterilized materials in the designated Product Storage Area that is operated under negative pressure with emissions being directed to the control device.
[Georgia Rule 391-3-1-.02(2)(a)(3)(ii)]

5. Monitoring

- 5.1 The Permittee shall maintain and operate Dry Bed System 1 (Source Code SYS1) as follows:
[391-3-1-.02(6)(b)1.]
 - a. Once per calendar month, the Permittee shall collect and record the concentration of a 24-hour sample of ethylene oxide emissions from the outlet of Dry Bed System 1 (Source Code SYS1). If the measured exhaust concentration exceeds 208.0 micrograms per cubic meter, the Permittee shall replace the dry bed material within 30 days. The dates of dry bed material replacement shall be recorded and kept in a form suitable for inspection or submission to the Division.
 - b. The Permittee shall conduct sampling using method T0-15a, the bag sample method, or any other method approved by the Division. When the Permittee is sampling in accordance with this Condition, if the Permittee is using the bag sample method pursuant to the Work Practice Plan, the ethylene oxide concentration shall be recorded within 3 hours of the sampling event. These records shall be kept in a form suitable for inspection or submission to the Division.

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5.2 The Permittee shall develop, implement, and maintain a Work Practice Plan for the Product Storage Area (Source Code PSTR) air system. The Permittee shall operate the facility in accordance with the plan, which shall include a monitoring protocol to demonstrate proper operation of the negative pressure system used to control emissions from the Product Storage Area. Negative pressure system monitoring shall be conducted at least once per day. The plan shall contain a protocol for the dry bed system sampling required by Condition 5.1, including maintenance and calibration of monitoring devices and formulas for conducting calculations related to the sample. All records necessary to demonstrate compliance with the Work Practice Plan shall be kept in a form suitable for inspection or submission to the Division. The Permittee shall submit an updated Work Practice Plan within 60 days after issuance of this permit to ensure consistency with the requirements of this permit. The plan must also include a protocol to minimize ethylene oxide emissions from on-site trucks containing sterilized product.
[391-3-1-.02(6)(b)1.]

5.3 The Permittee shall develop, implement, and maintain an ethylene oxide Leak Detection and Repair Program. The program shall check all outside components (valves, flanges, fittings, etc.) for leaks with, at a minimum, weekly monitoring of all components. The program, and any modifications to the program, shall be subject to review and approval by the Division. A copy of the program shall be submitted to the Division, in writing, no later than 60 days following the date of issuance of this permit.
[391-3-1-.02(6)(b)1.]

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 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.
- 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.

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- 6.2 Within 6 months of the initial issuance date of this permit, the Permittee shall conduct ethylene oxide performance testing of Dry Bed System 1 (Source Code SYS1), according to the test methods approved by EPA and/or the Division. The test report shall list the outlet concentration of ethylene oxide, the final exhaust mass emission rate of ethylene oxide, and the control efficiency of the dry bed system. The performance testing shall be repeated at least once every 5 years.
[Georgia Rule 391-3-1-.02(2)(a)(3)(ii)]

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.
[391-3-1-.02(6)(b)1.]
- 7.2 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.
[391-3-1-.02(6)(b)1.]
- 7.3 For the Dry Bed System sample required by Condition 5.1, the Permittee shall include the following information in the semiannual report required by Condition 7.4.
[391-3-1-.02(6)(b)1.]
- a. For Dry Bed System 1 (Source Code SYS1), records of all monthly ethylene oxide measurements, including date and time taken during the reporting period, with a list of any monthly measurement that exceeds 208.0 micrograms per cubic meter.
 - b. For Dry Bed System 1 (Source Code SYS1), any instance when the bed material is not replaced in accordance with Condition 5.1.
 - c. The date and time of any Dry Bed System 1 (Source Code SYS1) replacement. If no replacement was required during the reporting period, the report shall state so.
 - d. Any instance that negative pressure cannot be verified for the system controlling the Product Storage Area (Source Code PSTR) air as specified in Condition 4.4.

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7.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by July 30 and January 30, respectively. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants** and shall contain the following:
[391-3-1-.02(6)(b)1.]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursion that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

7.5 Any spill or unpermitted release of ethylene oxide at the facility, regardless of the amount of the release, shall be reported to the Air Protection Branch by email (air.releases@dnr.ga.gov) within 24 hours of discovering such spill or release. As used in this condition, the term "spill or release" shall have the same meaning as set forth in the Georgia Code O.C.G.A. § 12-14-1. Emissions of ethylene oxide resulting from an operator error, a malfunction, or other failure of equipment at the facility that results in ethylene oxide not being routed through the air pollution control equipment prescribed in this permit is a release. The full report shall describe (1) the release, (2) its causes, (3) the estimated amount of ethylene oxide released, and (4) the steps taken to contain it and said report shall be submitted within 48 hours of the initial email notification.

[Georgia Code O.C.G.A. § 12-9-7(a) and Georgia Rule 391-3-1-.02(2)(a)(3)(ii)]

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- 7.6 The Permittee shall submit compliance notifications and reports to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354

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.