

Georgia EPD Air Permitting Process – May 2, 2022
James Boylan, Ph.D. – Assistant Branch Chief, Air Protection Branch

Georgia EPD has not yet received an air permit application from Rivian. We expect the primary air pollutants to be volatile organic compounds (VOCs) from the painting operations and battery manufacturing along with nitrogen oxides (NO_x) and carbon monoxide (CO) from the boilers. In addition, the facility will have particulate matter (PM) emissions. Emission control devices will be installed to reduce those pollutants. If the emissions from any pollutant are over 100 tons/year, the facility will be classified as a major source and be required to obtain a Title V operating permit. In addition, if the emissions from any pollutant are over 250 tons/year, the facility will have additional permitting requirements under the federal Prevention of Significant Deterioration (PSD) program.

All major source permit applications will include:

1. details on the process and control equipment,
2. regulatory analysis of applicable rules,
3. emission calculations, and
4. toxic air pollutants (TAPs) modeling, if any of the TAPs are greater than the applicable thresholds.

If the permit triggers PSD, the applicant will need to:

1. perform a Best Available Control Technology (BACT) analysis for all control options,
2. perform modeling for criteria air pollutants (such as NO₂, CO, and PM) to compare against the National Ambient Air Quality Standards (NAAQS) and PSD Increment, and
3. perform a Class I Areas impact analysis in conjunction with the Federal Land Managers (FLMs).

When the permit application is submitted, GA EPD will publish a Public Advisory¹. If you would like to be notified, you can go to our website at epd.georgia.gov/public-announcements. Click “See Air Announcements” then you can register under “Subscribe to Air Notices.” This advisory will provide links for the permit application and supporting documentation on our website. There is a 30-day comment period on the permit application. Comments made by the public are considered during the development of the draft permit.

If the facility does not provide information that shows they will be protective to public health or the ability to meet regulatory requirements, the permit will not be approved. If the determination is to move forward with a permit, it will be drafted and move to the next step.

When the draft permit is ready, the applicant will publish a public notice in the local newspaper and Georgia EPD will send out an email to all participants in our Public Notice listserv (same listserv as mentioned earlier). This allows for the public to review the draft permit and supporting documents on our website and make comments. There is a 30-day comment period on the draft permit. If requested, a public hearing may be held to allow for verbal comments on the permit. All verbal and written comments are taken into consideration and addressed in the narrative of the permit. Comments that lead to changes will be incorporated into the final permit.

After the final permit is issued, the public has a 30-day window to file a petition to appeal if the permit is not in compliance with any federal or state requirements. After the facility is constructed and becomes operational, the facility will be required to perform stack tests on all control equipment to ensure it is operating properly. In addition, GA EPD will complete on-site compliance inspections at least every other year to make sure that all the air permit conditions are being met.

¹ <https://public.govdelivery.com/accounts/GADNR/subscriber/new?preferences=true>