

facilities not regulated as a specific industrial source type. Potential emissions at the Adel Facility will be below 25 tpy for total HAP and 10 tpy for all individual HAP. Therefore, the facility is an area source of HAP emissions.

Regulatory requirements for facilities subject to Part 61 and Part 63 NESHAP are incorporated by reference in Georgia's Rules for Air Quality Control, 391-3-1-.02(9).

4.5.1 40 CFR 63 Subpart A - General Provisions

NESHAP Subpart A, *General Provisions*, contains national emission standards for HAP defined in Section 112(b) of the Clean Air Act. All affected sources which are subject to another NESHAP are subject to the general provisions of NESHAP Subpart A, unless specifically excluded by the source-specific NESHAP.

4.5.2 40 CFR 63 Subpart DDDD - Plywood and Composite Wood Products

NESHAP Subpart DDDD, *NESHAP for Plywood and Composite Wood Products*, applies to major sources of HAP that manufacture plywood or composite wood products (PCWP) by bonding wood materials (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. The Adel Facility is an area source of HAP emissions; therefore, NESHAP Subpart DDDD does not apply.

4.5.3 40 CFR 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines

NESHAP Subpart ZZZZ regulates HAP emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. Per 40 CFR 63.6590(a)(2)(iii), a stationary RICE at a major source of HAP is considered new if construction commences on or after June 12, 2006. The proposed diesel emergency fire pump engine qualifies as a new stationary RICE. However, compliance per NESHAP for the engine is attained through compliance with the requirements of NSPS IIII.⁷ Renewable Biomass Group will ensure compliance to applicable requirements or limits for the diesel fire pump engine.

4.5.4 40 CFR 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters (Major Sources)

NESHAP Subpart DDDDD, *NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters*, regulates HAP emissions from solid, liquid, and gaseous-fired boilers and process heaters at facilities that are major sources of HAP. The Adel Facility will be an area source of HAP emissions; therefore, the dryer burner at the facility is not subject to Subpart DDDDD.

4.5.5 40 CFR 63 Subpart JJJJJJ - Industrial, Commercial, and Institutional Boilers (Area Sources)

NESHAP Subpart JJJJJJ, *NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources*, regulates HAP emissions from boilers at facilities that are area sources of HAP. The Adel Facility dryer burner and dryer are not defined as boilers per 40 CFR 63.11237, because no portion of the heat from the burner or the dryer is used to generate steam at the facility.

⁷ 40 CFR 63.6590(c)(6)