

The proposed dryer burner will supply heat to the drying process and thus, meets the definition of fuel burning equipment and will be subject to this rule. The diesel-fired emergency fire pump engine will be used to produce electricity, not thermal energy; hence the unit is not subject to this regulation.

This regulation limits PM emissions from all fuel-burning equipment based on the heating capacity of the equipment units. The dryer burner will have a heat input capacity equal to or greater than 10 MMBtu/hr, and equal to or less than 2,000 MMBtu/hr. Therefore, the unit is limited to PM emissions determined from the following equation:

$$P = 0.7 * (10 / R)^{0.202}$$

Where:

P = allowable weight of PM emissions (pounds per MMBtu heat input)

R = heat input of fuel-burning equipment (MMBtu/hr)

In addition, opacity is limited to 20% except for one six-minute period per hour, which may be up to 27%.

4.6.3 GRAQC 391-3-1-.02(2)(e) - PM Emissions from Manufacturing Processes

This regulation, commonly known as the process weight rule (PWR), establishes PM limits for all sources if not specified elsewhere. The PM emissions are limited based on the following equations (for equipment constructed or modified after July 2, 1968), where equation (a) applies to sources with a process input rate of less than or equal to 30 tph, while equation (b) applies to sources with a process input rate of more than 30 tph:⁹

$$(a) E = 4.10 \times P^{0.67} \qquad (b) E = 55.0 \times P^{0.11} - 40$$

where: E = allowable PM emission rate (lb/hr)
P = process input weight rate (tons/hr)

This regulation applies to the raw material and pellets processing and handling systems. Since the dryer and dryer burner are subject to a PM limit under Rule (d), this rule does not apply to the units.

4.6.4 GRAQC 391-3-1-.02(2)(g) - Sulfur Dioxide

This regulation establishes SO₂ emission limits for fuel-burning sources, not “equipment”. The proposed diesel fire pump engine has a maximum heat input capacity less than 100 MMBtu/hr and is hence, subject to a fuel sulfur content limit of 2.5%, by weight, for any fuel fired. The dryer burner has a maximum heat input capacity greater than or equal to 100 MMBtu/hr and is subject to a fuel sulfur limit of 3% by weight. The emergency fire pump engine will be subject to a more stringent fuel sulfur standard of 15 ppm through NSPS Subpart IIII, thereby subsuming the Rule (g) sulfur limit.

4.6.5 GRAQC 391-3-1-.02(2)(n) - Fugitive Dust

This regulation requires facilities to take reasonable precautions to prevent fugitive dust from becoming airborne. Operations at the facility, including the wood chips, sawdust, and pellets handling and storage systems, are covered by this generally applicable rule. The appropriate precautions will be taken to prevent

⁹ GRAQC 391-3-1-.02(2)(e)(1)(i)