

- Condition 5.6 requires a Preventive Maintenance Program (PMP) for each of the baghouses.
- Condition 5.7 contains the operation and maintenance checks for the cyclone.
- Condition 5.8 contains the daily VE Check requirements for fugitive sources.

The following are the monitoring requirements for Phase II:

- Condition 5.9a. requires that the facility use a VOC CEMS to continuous monitor VOC emissions from the biofilter.
- Condition 5.9b. requires that the facility continuously monitor the RTO combustion zone temperature.
- Condition 5.10 contains the periodic operating parameter monitoring for all PM control devices.
- Condition 5.11 includes an equation for tracking/calculating the secondary power for each field of the wet electrostatic precipitators.
- Condition 5.12 includes the daily visible emission check (VE check) requirements for each stack (from a control device).
- Condition 5.13 requires a Preventive Maintenance Program (PMP) for each of the baghouses.
- Condition 5.14 contains the operation and maintenance checks for the cyclone.
- Condition 5.15 requires a Preventive Maintenance Program (PMP) for the RTO.
- Condition 5.16 contains the daily VE Check requirements for fugitive sources.

Condition 6.2 specifies test methods to be used for the performance tests required by the permit.

The following are the testing requirements for Phase I:

- Condition 6.3 contains all the initial performance tests in order to validate the uncontrolled NO<sub>x</sub> and CO emission factors and after-control VOC, Total PM, and HAP emission factors. Condition 6.3 also includes the initial performance test to validate the 0 lb/ton As, and Cr VI emission factors.
- Note that VOC emissions from the biofilter are monitored with the VOC CEMS, so repeated VOC testing for the biofilter stack is not needed.
- The initial performance tests for As and Cr VI is needed to prove the facility's claim that burning virgin wood would not emit any As and Cr VI. No repeated test is needed if the initial test results are zero.

If the initial tests detect As and/or Cr VI, the facility will be required to submit an application that will either update the As or Cr VI emission factor in Section 7 or remove the MER caps by submitting a TIA. Whether repeated tests is needed will be determined during the review of that application.