

The following are the record keeping and reporting requirements for Phase II:

- Condition 7.16 requires that the facility maintain records of throughput data, which will be used to track actual emissions with emission factors in the unit of lb/ton. Condition 7.16 also requires that the facility tracking the amount of wet wood and dry wood burned in the burners, combined, which will be used to track actual emissions with emission factors in the unit of lb/MMBtu.
- Condition 7.17 requires that the facility maintain records of operating hours for the emission units with Total PM emission factors in the unit of lb/hr. Operating hours of Dryers DRY5 and DRY6, operating hours of RTO when three-hour rolling average RTO combustion zone temperature falls below the minimum combustion zone temperature set point, and RTO bypass event (hours) are needed to determine the percentage of monthly operating time that the RTO has no control efficiency over VOC and HAP emissions (percent down time or %DT).
- Condition 7.18 includes the NO_x emission tracking equation. Note that the dryer burners are the only combustion source and are therefore the only source of NO_x emissions. Below shows how the NO_x emission factor is calculated using the application data.

Stack	Emission Unit	Application E.F. (lb/MMBtu)
S1	BUR5 & BUR6	0.194

- Condition 7.19 includes the CO emission tracking equation. Note that the dryer burners are the only combustion source and are therefore the only source of CO emissions. Below shows how the CO emission factor is calculated using the application data. The facility did not claim any control efficiency over CO emissions by the RTO.

Stack	Emission Unit	Application E.F. (lb/MMBtu)
S1	BUR5 & BUR6	0.194

- Condition 7.20 includes the VOC emission tracking equation. All the processes that duct to Stack S1 (burners/dryers) and Stack S2 (dry wood silos, dry hammermills, pellet mills, and pellet coolers) are the only point sources of VOC emissions. Below shows how the VOC emission factor is calculated using the application data. A 98% control efficiency for the RTO is used initially; for any 3-hour period that the combustion zone temperature falling below the set point, and any RTO bypass event, the control efficiency is not considered during that period. Any malfunction of the biofilter will be noticed by the VOC CEMS; therefore, after-control VOC emission factor for Stack S1 is used.

Stack	Emission Unit	PTE (tpy)	Annual Throughput (tpy)	Application E.F. (lb/ton wood)
S1	BUR5 & BUR6 DRY5 & DRY6			6 (Uncontrolled) 98% DRE
S2	DWS1 & DWS2	14.6	1,320,000	0.233
	DHM1 – DHM6	116		
	PM1 – PM32 COOL1 – COOL4	23.1		