

Condition 8.3 requires the Permittee to submit a Title V permit application electronically using GEOS within 12 months after the initial startup of the facility (in Phase I).

Toxic Impact Assessment

The applicant conducted a Toxic Impact Assessment for both phases of the project.

Phase I TIA. The applicant compared the sitewide PTE to MERs for Acetaldehyde, Acrolein, Formaldehyde, HCl, Methanol, Phenol, and Propionaldehyde and found that PTEs for Acetaldehyde, Acrolein, and Formaldehyde exceed their MER values. The applicant did not evaluate the impact of Arsenic and Chromium VI emissions in its TIA.

HAP	CAS	PTE (tpy)	PTE (lb/yr)	MER (lb/yr)	Model?
Acetaldehyde	75-07-0	2.79	5,577	1,110	Yes
Acrolein	107-02-8	0.45	894	4.87	Yes
Formaldehyde	50-00-0	3.62	7,233	267	Yes
HCl	7647-01-0	1.12	2,240	4,870	No
Methanol	67-56-1	2.90	5,793	30,100	No
Phenol	108-95-2	0.42	835	2,200	No
Propionaldehyde	123-38-6	0.14	273	1,950	No

The Permittee then modeled emissions of Acetaldehyde, Formaldehyde and Methanol and looked at the short term (15-minutes) and long-term (annual) impacts of emission of these three pollutants and compared them against the AACs for these three HAPs for the 15-minute and Annual time period. In its modeling the Permittee modeled emissions from the biofilter stack (point source) and the HAP emissions from the pellet storage silos (Area sources). From the modeled results the short term and the long term MGLC's were lower than the respective AACs.

EPD confirmed the modeling results. EPD's findings are listed below.

TAP	Averaging Period	AAC ($\mu\text{g}/\text{m}^3$)	Max. Modeled Conc. ($\mu\text{g}/\text{m}^3$)
Acetaldehyde	15-min	4,500	1.54
	Annual	4.55	0.027
Acrolein	15-min	23	0.25
	Annual	0.35*	0.004
Formaldehyde	15-min	245	1.91
	Annual	1.1	0.034

* SSPP approved applicant's case-by-case request to use a revised annual AAC of $0.35 \mu\text{g}/\text{m}^3$ for acrolein.