

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2499-075-0028-E-01-0**

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The Permittee shall use the monthly records to calculate the facility-wide CO emissions during each calendar month. The Permittee shall notify the Division in writing if the facility-wide CO emissions exceed 20.75 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the CO emission limitation in Condition 2.1.

7.20 Upon the initial startup of Phase II, the Permittee shall calculate and record the amount of VOC emissions from the entire facility in each calendar month, using the following equation:
[391-3-1-.02(6)(b)1.]

$$ER_{VOC} = \{ EF_{VOC/DR} * W_{DR} * [\%DT + (1 - DRE) * (1 - \%DT)] + EF_{VOC/S2} * W_{COOL} \} / 2,000$$

$$\%DT = (T_{DT} / T_{DR}) * 100\%$$

Where:

- ER_{VOC} = Monthly VOC emission rate from the entire facility, in tons per month.
- EF_{VOC/DR} = Uncontrolled VOC emission factor prior to RTO, in lbs VOC/ton wood.
- W_{DR} = Monthly throughput of Dryers DRY5 and DRY6, combined, determined and recorded in accordance with Condition 7.16a.
- %DT = RTO percent down time, in percentage.
- T_{DT} = Total hours per month that (1) the three-hour rolling average RTO combustion zone temperature falls below the minimum combustion zone temperature set point, determined and recorded in accordance with Condition 7.17d.; and (2) exhausts from BUR5, BUR6, DRY5, or DRY6 bypasses RTO, determined in accordance with Condition 7.17e.; **combined**, in hours per month.
- T_{DR} = Total operating hours per month that either DRY5 or DRY6 is in operation (non-cumulative), determined in accordance with Condition 7.17f.
- DRE = RTO control efficiency, in percentage.
- EF_{VOC/S2} = VOC emission factor for Stack S2, in lbs VOC/ton wood.
- W_{COOL} = Monthly throughput of COOL1 – COOL4, combined, determined and recorded in accordance with Condition 7.16b.
- 2,000 = Conversion Factor to Convert Pound into Ton.

The Permittee shall calculate VOC emissions from the entire facility by using the following emission factor and the equation provided in this condition prior to initial performance tests. If any performance testing required in Conditions 6.9c.i., 6.9c.ii., and 6.10 reveals emission factors higher than the emission factor listed below, the Permittee shall comply with Condition 6.13.