

produce larger wood scrap that is not expected to become airborne. Therefore, the facility is expected to comply with the limits of Georgia Rule (b).

Georgia Rule 391-3-1-.02(2)(d), Fuel-Burning Equipment

Georgia Rule (d)2.(i) and (d)3. limits the rate of PM emissions and visible emissions from fuel burning equipment with a capacity less than 10 MMBtu/hr. Because the energy system (ID No. ES) provides direct heat to the dryers through the combustion of fuel and does not provide heat via the heating of another medium, it does not qualify as fuel-burning equipment and is therefore not subject to the PM emission limits of Georgia Rule (d). Because the boiler (ID No. BLR) will fire natural gas, whose combustion is not expected to produce significant PM emissions, it is expected to comply with Georgia Rule (d) limits.

Georgia Rule 391-3-1-.02(2)(e), Particulate Emissions from Manufacturing Processes

Georgia Rule (e) limits the emission of PM from all manufacturing processes according to the following equations:

$$E = 4.1 * P^{0.67} \quad \text{for process input weight rate up to and including 30 tons per hour.}$$
$$E = 55 * P^{0.11} - 40 \quad \text{for process input weight rate above 30 tons per hour.}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the process input weight rate in tons per hour.

As discussed previously, PM emissions from the operation of the wood dryers (ID Nos. DRY1, DRY2, and DRY3), hammermills (ID Nos. DHM1-DHM8), dry wood bins (ID Nos. DWB1 and DWB2), pellet mills (ID Nos. PM1-PM8), and pellet coolers (ID Nos. COOL1 and COOL2) will all be controlled by cyclones, baghouses, a wet ESP, and a biofilter. Debarking, shredding, and chipping operations are not expected to produce significant airborne PM emissions. Therefore, the facility is expected to comply with the Georgia Rule (e) PM emission limits.

Georgia Rule 391-3-1-.02(2)(g), Sulfur Dioxide

Georgia Rule (g) limits fuel-burning sources with a heat input capacity less than 100 MMBtu/hr to burning fuels containing less than 2.5 percent sulfur. The energy system burner (ID No. ES) fires only wood, which has a natural fuel sulfur content of much less than 2.5%. Therefore, compliance with the fuel sulfur limits of Georgia Rule (g) is expected.

The boiler (ID No. BLR) fires exclusively on natural gas, which also contains minimal amount of sulfur. Compliance with the GA Rule (g) sulfur content limit is also expected for BLR.

Georgia Rule 391-3-1-.02(2)(tt), VOC Emissions from Major Sources

Georgia Rule (tt) limits VOC emissions from sources emitting more than 25 tpy VOC. The facility is located in Cook County, which is not one of the named counties subject to the requirements of Georgia Rule (tt). Therefore, it does not apply.