

Existing Condition 7.6 has been modified to apply to the revised emission units, control devices, and the associated ID numbers. The requirement to record the monthly amount of natural gas consumption in Boiler BLR is added in Condition 7.6; such records will be used to calculate BLR's emissions.

In case if Boiler BLR is kept in Phase II, its emissions should also be included in the facility-wide actual emissions. A similar change has been made to Condition 7.17.

Existing Condition 7.7 was removed because the facility will no longer have sizing/screening/transport operations or a fuel dust silo.

Existing Conditions 7.8 through 7.14 have been modified for the following reasons:

- To apply to the revised emission units, control devices, and the associated ID numbers.
- To add the boiler (ID No. BLR) emissions to the facility-wide totals. Every equation has been updated with the additional terms to calculate boiler emissions.
- Since the facility requested to test the RTO emission rates at the outlet only, they proposed to multiply outlet VOC and HAP emissions by 50 when the RTO is not properly controlling emissions, which is called RTO downtime. Such RTO downtime would occur when (1) RTO has been bypassed or (2) any 3-hr average RTO combustion zone temperature falls below the minimum temperature set point established during the most recent testing. The rationale for the multiplying factor, 50, is based on a assumed 98-percent VOC DRE that (compared to a lower VOC DRE) will end up with a higher uncontrolled VOC emission factor. Recent pellet mill and RTO test data obtained from U.S. EPA Region IV are mostly 98% VOC DRE and below. Therefore, the Division agrees with the facility that the 50-multiplying factor is a conservative factor and has incorporated it in Conditions 7.10 and 7.12.
- The modified application emission factors have been incorporated in these conditions.
- To incorporate the Division's new policy on all pellet mills. These conditions now require the facility to use the most recent performance test results to calculate their actual emissions. The emission factors in the tables are the application emission factors and are only allowed to be used before the initial performance tests are conducted.

Although Phase II will generally remain the same, and the facility specifically requested that all conditions for Phase II remain unchanged, existing Conditions 7.18 through 7.24 have been modified for the following. There are no modifications to the emission units or the emission unit list in Phase II identified in the E-01-0 permit. To test VOC DRE for the RTO and use it in the VOC and HAP emission calculations also remains the same for Phase II; the facility did not make the same request for Phase I (applying the 50-multiplying factor when RTO is not properly controlling emissions) for Phase II.

- To add the boiler (ID No. BLR) emissions to the facility-wide totals. Every equation has been updated with the additional terms to calculate boiler emissions. This is the change in Phase I.
- To incorporate the Division's new policy on all pellet mills. These conditions now require the facility to use the most recent performance test results to calculate their actual emissions. The emission factors in the tables are the application emission factors and are only allowed to be used before the initial performance tests are conducted.