

Table 4: Summary of Toxic Impact Analysis

Pollutant	AAC, µg/m ³		SCREEN3 Modeling Results/MGCL, µg/m ³			Acceptability of the Predicted MGCL/Ambient Impact	
	15-Minute	Annual	1-Hour	15-Minute	Annual	15-Minute	Annual Impact
Acetaldehyde	4,500	4.55	2.46	3.24	0.20	Acceptable	Acceptable
Acrolein	23	0.35*	4.28	5.65	0.34	Acceptable	Acceptable
Formaldehyde	245	1.10	3.74	4.94	0.30	Acceptable	Acceptable

*Use of alternative AAC for acrolein approved by Division. Referenced from EPA's *Residual Risk Assessment for Plywood and Composite Wood Products*.

Based on a unit emission rate of 1 g/s, the unit MGLC was found to be 84.86 micrograms per cubic meter (µg/m³), located 240 meters from the stack. The short-term (15-minute) and long-term (annual) MGLC for all three pollutants are each below their respective acceptable ambient concentrations (AAC), and therefore all pollutants comply with the Georgia Air Toxics Guideline. No further modeling is needed.

MER and AAC values for each HAP (except acrolein) were referenced from Appendix A of the Summary of Ambient Impact Assessment of Toxic Air Pollutant Emissions (2018).

Public Advisory Comments

A Public Advisory comment from 4C, received on July 12, 2024, raised concerns that the modifications proposed to Phase I of the Permit would be incompatible with Phase II and requested the revocation of authorization to construct Phase II with the issuance of this Amendment.

EPD Response:

The facility has requested to keep their facility-wide production throughput unchanged (600,000 tpy); additionally, all facility-wide emissions of criteria pollutants will remain below 250 tpy, and all facility-wide emissions of single/combined HAP will remain below 10/25 tpy, respectively. No previously permitted limits in Phase I or Phase II will be exceeded as a result of the modifications requested in the application. Conditions in the E-01-0 Permit and the proposed Permit Amendment have been clearly delineated which Conditions apply to Phase I, Phase II, or both. Modified Condition 2.11 identifies all the Phase I conditions and ensures that all Phase I conditions will become null and void upon startup of Phase II of the project, to avoid any inconsistencies or ~~incompatibility~~ ~~incompatibilities~~ ~~Conditions~~ between the Phases. The Division does not expect the two Phases to be incompatible.

Another comment from 4C raised concerns about heavy dust resulting from the facility's operation of a logyard, chipper, and debarker near a residential area.

EPD Response:

As mentioned in the comment, Condition 3.3 of the original Permit requires the facility to develop a more site-specific dust control plan for fugitive sources that will potentially impact the surrounding community; additionally, Conditions 3.1 and 3.2 of the original Permit contain general requirements for fugitive dust control as required by Georgia Rule (n). Conditions 5.8 (for Phase I) and 5.16 (for Phase II) contains the daily visible emission (VE) check for the logyard, chipper, debarker, and other fugitive PM sources. These are already the most stringent permit requirements that are uncommon to many fugitive PM sources at other