

Condition 2.3 requires operation of all control devices such as the wet ESP, Biofilter and RTO (in Phase II) whenever the associated sources are in operation.

Condition 2.4 requires operation of all baghouses and cyclones in both phases whenever the associated sources are in operation.

As discussed previously, the facility used many after-control emission factors to calculate facility-wide PTE and will be required to use these after-control emission factors to track actual emissions. Therefore, operating the control devices at all times when the associated emission units are in operation, as specified in Conditions 2.3 and 2.4, are part of the PSD avoidance limits.

Condition 2.5 allows firing of wood only in the dryer burners in both phases.

Condition 2.6 allows firing of natural gas only in the RTO burners.

Condition 2.7 contains the GA Rule (b) visible emission limit.

Condition 2.8 contains the GA Rule (e) PM emission limits.

As discussed previously, the facility claimed that burning virgin wood in the dryer burners would not emit any arsenic and hexavalent chromium and refused to conduct a TIA to demonstrate compliance with the GA Air Toxics Guidelines for these two metal HAPs. The only way to avoid a toxic modeling for these HAPs is when facility-wide PTE for the two HAPs, in pounds per year (lbs/yr), is each below the associated minimum emission rate (MER) specified in the guidelines. Therefore, the Division includes the As and Cr VI MER's in Conditions 2.9 and 2.10 as their annual emission caps.

Condition 2.11 states that all permit conditions that apply to Phase I of the project would become null and void after the initial startup of Phase II. All of the conditions in Section 5 (monitoring), Section 6 (Testing), and Section 7 (record keeping and reporting) are divided into two groups, Phase I and Phase II. Condition 2.11 specifies the condition numbers for the Phase I group that will be revoked once Phase II comes online.

Condition 3.2 limit fugitive emission opacity to 20% or less per Georgia Rule (n)2.

Condition 4.2 requires RTO to maintain combustion zone temperature of the RTO to 1500 °F after startup of Phase II of the project until source tests. After the performance tests, the RTO needs to be operated at or above the minimum temperature established during the tests.

The following are the monitoring requirements for Phase I:

- Condition 5.2 requires that the facility use a VOC continuous emission monitoring system (CEMS) to continuously monitor VOC emissions from the biofilter.
- Condition 5.3 contains the periodic operating parameter monitoring for all PM control devices.
- Condition 5.4 includes an equation for tracking/calculating the secondary power for each field of the wet electrostatic precipitators.
- Condition 5.5 includes the daily visible emission check (VE check) requirements for each stack (from a control device).