

TIA Phase II

The applicant did the same analysis for Phase II. The comparison of the sitewide PTE vs the MERs in Phase II are listed in Table below:

Air Toxic	CAS	PTE (tpy)	PTE (lb/yr)	MER (lb/yr)	Model?
Acetaldehyde	75070	1.74	3,485	1,110	Yes
Acrolein	107028	0.65	1,299	4.87	Yes
Formaldehyde	50000	2.35	4,692	267	Yes
HCl	7647-01-0	2.46	4,927	4,870	Yes
Methanol	67-56-1	1.97	3,932	30,100	No
Phenol	108-95-2	0.52	1,048	2,200	No
Propionaldehyde	123-38-6	0.20	390	1,950	No

In Phase II, the applicant did not evaluate the impact of Arsenic and Chromium VI emissions in its TIA, either. The applicant found Acetaldehyde, Formaldehyde, Methanol, and HCl PTE's exceeded the MERs for these HAPs and modeled the short-term and long-term impacts of these HAP emissions and compared them with the AACs for these HAPs. In Phase II, the Permittee modeled the RTO stack, the biofilter stack and the pellet silos. The RTO stack and the biofilter stack was modeled as point sources and the pellet silos were modeled as area sources. The model results confirmed that both short term and long term impacts of these HAP emissions were less than their respective AACs.

EPD confirmed the modeling results which are listed below:

TAP	Averaging Period	AAC ($\mu\text{g}/\text{m}^3$)	Max. Modeled Conc. ($\mu\text{g}/\text{m}^3$)
Acetaldehyde	15-min	4,500	1.44
	Annual	4.35	0.036
Acrolein	15-min	23	0.31
	Annual	0.35*	0.005
Formaldehyde	15-min	245	1.82
	Annual	1.1	0.045
HCl	15-min	700	2.43
	Annual	20	0.053

* SSPP approved applicant's case-by-case request to use a revised annual AAC of $0.35 \mu\text{g}/\text{m}^3$ for acrolein