

On December 30, 2024, the facility submitted a revised application stating that the requested changes will apply only to Phase I of the project and that Phase II would remain entirely untouched, clarifying their chosen operating scenario of a biofilter and regenerative thermal oxidizer, and updating the emission unit list and emission factors. The Division will not amend any emission units of Phase II at this time.

In the modified Phase I, operations will begin with weighing and screening of wood scrap, which will be received by the facility in trucks or created from logs debarked, chipped, and shredded onsite. The wood will then be dried in one of the three dryers (ID Nos. DRY1, DRY2, and DRY3), which will all be heated by a wood-fired energy system (ID No. ES). Despite the dryer changes, the designed annual throughput for Phase I remains at 600,000 tons pellets (final product). Emissions from the dryers will be controlled by one wet electrostatic precipitator (ID No. WESP) and one regenerative thermal oxidizer (ID No. RTO). The dried wood will then be processed in the hammermills (ID Nos. DHM1-DHM8), pelletized in the pellet mills (ID Nos. PM1-PM8) and cooled in the pellet coolers (ID Nos. COOL1 and COOL2). Dried wood from the dryers and hammermills will be stored in bins (ID Nos. DWB1 & DWB2), which will also be controlled by the WESP and RTO. Finished pellets from the pellet coolers will be stored in one of six silos (ID Nos. SILO1 – SILO6).

Emissions from three of the dry hammermills (ID Nos. DHM1-DHM3) will be controlled by three respective cyclones (ID Nos. CYC1-CYC3), three baghouses (Group ID No. BGH), and one energy system (ID No. ES). Emissions from the remaining dry hammermills (ID Nos. DHM4-DHM8) will be controlled by five respective cyclones (ID Nos. CYC4-CYC8), the WESP, and the RTO. The baghouses (Group ID No. BGH) and WESP are the primary particulate matter control devices.

Emissions from the pellet mills will be controlled directly by a biofilter (ID No. BIO) and emissions from the pellet coolers will be controlled by two quad cyclones (ID Nos. QUAD1 and QUAD2) followed by the biofilter (ID No. BIO).

The facility will also operate a 9.9 MMBtu/hr natural gas-fired boiler (ID No. BLR) to condition the pellets during the pelletizing process. Although a natural gas fired boiler could be exempt from permitting, its emissions should be counted toward the facility-wide emissions; therefore, Boiler BLR is included in the proposed permit amendment.

Updated Equipment List

Table 1: Phase I Equipment List

Emission Units			Associated Control Devices	
Source Code	Description	Applicable Requirements	Source Code	Description
LOG	Log yard	391-3-1-.02(2)(n)	--	--
BARK1	One (1) debarker	391-3-1-.02(2)(n)	--	--
CHIP	One (1) chipper	391-3-1-.02(2)(n)	--	--
TRUCK1&2	Two (2) truck dumps	391-3-1-.02(2)(n)	--	--
CLAR1&2	Two (2) Clarke bins	391-3-1-.02(2)(n)	--	--
SHRED1-4	Four (4) shredders	391-3-1-.02(2)(n)	--	--
ROAD	Plant road traffic	391-3-1-.02(2)(n)	--	--