Pollutant	Potential Emissions
Total HAP	<25 (by permit limit) 7.52 (in the application)

Regulatory Applicability

40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units

Per 40 CFR 60.40c(a), because the boiler (ID No. BLR) has a heat input capacity of less than 10 MMBtu/hr, it is not subject to Subpart Dc requirements.

40 CFR 63 Subpart B – Case-by-case MACT

The case-by-case MACT requirement specified in 40 CFR 63 Subpart B is triggered when a facility is major for HAP emissions under Title V, and any major HAP emitting sources at the facility are not subject to any specific MACT rules in 40 CFR 63. Since the facility will be a minor/area source for HAP emissions with the HAP emission limits in Condition 2.2, the facility (pellet mill) will not trigger the case-by-case MACT requirements.

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

40 CFR 63 Subpart DDDD potentially applies to facilities that manufacture plywood and composite wood products and that are major sources of HAP emissions. Facility-wide single and combined HAP emissions are restricted to no more than 10 and 25 tpy, respectively, to keep the facility a minor source of HAP emissions. In addition, the facility (pellet mill) does not meet the definition of plywood and composite wood products manufacturing facility in 40 CFR 63.2292. Therefore, the subpart does not apply.

40 CFR 63 Subpart JJJJJJ – NESHAP for Industrial, Commercial, and Institutional Boilers for Area Sources

Because the facility is a minor source of HAP emissions, the new boiler (ID No. BLR) could potentially be subject to 40 CFR 63 Subpart JJJJJJ. However, per 40 CFR 63.11195, because Boiler BLR combusts only natural gas, it is considered a gas-fired boiler and is therefore not subject to Subpart JJJJJJ.

Georgia Rule 391-3-1-.02(2)(b), Visible Emissions

GA Rule (b) limits visible emissions from manufacturing processes to no more than 40% opacity. Operation of the wood dryers (ID Nos. DRY1, DRY2, and DRY3) and associated energy system (ID No. ES) will be controlled by the wet ESP (ID No. WESP) and the regenerative thermal oxidizer (ID No. RTO). PM emissions from three of the hammermills (ID Nos. DHM1-DHM3) will be controlled by cyclones (ID Nos. CYC1-CYC3) and three baghouses (ID No. BGH) and emissions from the remaining five (ID Nos. DHM4-DHM8) will be controlled by cyclones (ID Nos. CYC4-CYC8) and the wet electrostatic precipitator (ID No. WESP). The pellet mills (ID Nos. PM1-PM8) will be directly controlled by a biofilter (ID No. BIO), and the pellet coolers (ID Nos. COOL1 and COOL2) will be controlled by quad cyclones (ID Nos. QUAD1-QUAD2) routing to the biofilter. PM emissions from the dry wood bins (ID Nos. DWB1 and DWB2) will be controlled by the wet ESP (ID No. WESP). Debarking, shredding, and chipping operations mainly