

New Condition 5.17 requires the facility to develop and implement a Preventative Maintenance Program (PMP) for the RTO. This is a Phase I Condition that will become null and void upon startup of Phase II.

Modified Condition 6.3 requires the facility to conduct NO_x, CO, VOC, Total PM, HAP, arsenic, and hexavalent chromium performance tests on the Phase I emission units in order to validate the application emission factors and update the emission factors that will be used to calculate emissions. Below note the changes in this condition:

- Since the dryers and their heat source, dry wood bins, and dry hammermills will be controlled by the RTO instead of the biofilter, the test for these emission units have been modified to be tested at the RTO outlet.
- Tests for the pellet mills and pellet coolers will remain at the biofilter outlet.

The required tests that do not require repeated tests have been updated with the revised condition numbers in Condition 6.4.

Existing Condition 6.5 has been modified to update the revised emission units, control devices, and their ID numbers. In order to obtain emission factors that would represent the facility's normal operation, Paragraph c. has been modified to require that the facility also monitor the moisture content of the product exiting Dryers DRY1 – DRY3 during the RTO VOC test.

Existing Condition 6.6 has been modified to add the RTO outlet emission factors for NO_x, CO, VOC, PM, and HAPs. This condition has also been modified to allow the facility to use the most recent performance test results to calculate their actual emissions.

Due to the new policy for all pellet mills, the special language about using the higher tested results and the permit factors when tested results are lower in existing Condition 6.7 has been removed. However, if any results of the initial HAP emission testing are higher than the emission factors in Section 7 (also in Application No. 29318), those would indicate that the actual HAP emission rate in the unit of pound per hour would be greater than those in Application No. 29318. Then the facility must re-access their toxic impacts with the higher hourly emission rates. This has been incorporated into modified Condition 6.7.

Existing Condition 6.8 has been modified to apply to the revised emission units, control devices, and the associated ID numbers.

Although Phase II is expected to remain the same, and the facility specifically requested that all conditions for Phase II remain unchanged, existing Condition 6.13 has been modified to incorporate the new pellet mill emission calculation policy as described in the rationale explaining the changes in Condition 6.7. This just documents the Division's policy change for all pellet mills. This does not indicate any modifications to the emission unit list in Phase II identified in the E-01-0 permit.

Existing Condition 7.5 has been modified to apply to the revised emission units, control devices, and the associated ID numbers for Phase I. In addition, the MER value for Cr(VI) in Condition 7.5b.v. has been updated.

Note that all Phase II Conditions (7.5c.vii. – 7.5c.xii) remain unchanged from the previous permit.