

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Permit No. 2499-075-0028-E-01-1

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The Permittee shall use the monthly records to calculate the facility-wide CO emissions during each calendar month. The Permittee shall notify the Division in writing if the facility-wide CO emissions exceed 20.75 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the CO emission limitation in Condition 2.1.

7.10 The Permittee shall calculate and record the amount of VOC emissions from the entire facility in each calendar month, using the following equation:

[391-3-1-.02(6)(b)1.]

$$ER_{VOC} = \{(EF_{VOC/S1} * W_{DR}) * [50 * \%DT/100 + (1 - \%DT/100)] + (EF_{VOC/BLR}) * (H_{BLR}) + (EF_{VOC/S2} * W_{COOL}) + (EF_{VOC/SILO} * W_{SILO})\} / 2,000$$

$$\%DT = (T_{DT}/T_{DR}) * 100\%$$

Where:

- $ER_{VOC}$  = Monthly VOC emission rate from the entire facility, in tons per month.
- $EF_{VOC/S1}$  = Uncontrolled VOC emission factor prior to RTO, in lbs VOC/ton wood, determined in the most recent performance tests per Condition 6.6d. Before the initial performance test is conducted, the Permittee is allowed to use the VOC emission factor in Table 7.10 below.
- $W_{DR}$  = Monthly throughput of Dryers DRY1 – DRY3, combined, determined and recorded in accordance with Condition 7.6a.
- 50 = Multiply factor when dryer VOC emissions are not controlled by RTO.
- $\%DT$  = RTO percent down time, in percentage.
- $T_{DT}$  = Total hours per month that (1) the three-hour rolling average RTO combustion zone temperature falls below the minimum combustion zone temperature set point, determined and recorded in accordance with Condition 7.6f.; and (2) exhaust from ES, DRY1, DRY2, or DRY3 bypasses the RTO, determined in accordance with Condition 7.6g.; **combined**, in hours per month.
- $T_{DR}$  = Total operating hours per month that either DRY1, DRY2, or DRY3 is in operation (non-cumulative), determined in accordance with Condition 7.6h.
- $EF_{VOC/BLR}$  = U.S. EPA AP-42 VOC emission factor for Boiler BLR, 5.5 lbs VOC/MMcf NG.
- $H_{BLR}$  = Monthly natural gas consumption by Boiler BLR, in MMcf NG/mo, determined and recorded in accordance with Condition 7.6i.
- $EF_{VOC/S2}$  = VOC emission factor for Stack S2, in lbs VOC/ton wood, determined in the most recent performance tests per Condition 6.6e. Before the initial performance test is conducted, the Permittee is allowed to use the VOC emission factor in Table 7.10 below.
- $W_{COOL}$  = Monthly throughput of Coolers COOL1 – COOL2, combined, determined and recorded in accordance with Condition 7.6b.
- $EF_{VOC/SILO}$  = VOC emission factor for Finished Pellet Silos SILO1 – SILO6, in lbs VOC/ton wood, determined in the most recent performance tests per Condition 6.6f.