

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

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

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Before the initial performance test is conducted, the Permittee is allowed to use the VOC emission factor in Table 7.10 below.

- $W_{SILO}$  = Monthly throughput of Silos SILO1 – SILO6, determined and recorded in accordance with Condition 7.6c.
- 2,000 = Conversion factor to convert pounds into tons.

**Table 7.10: VOC Emission Factor That Should Be Used Before Any Test Results Are Available**

| Pollutant | Stack S1 (RTO Outlet)      | Stack S2 (BIO Outlet)                        | No Stack ID                 |
|-----------|----------------------------|--|-----------------------------|
|           |                            | ES/DRY1 – DRY3<br>DHM1 – DHM8<br>DWB1 & DWB2 | PM1 – PM8<br>COOL1 & COOL2  |
| VOC       | 0.176 lb / ton wood output | 0.64 lb / ton wood output                    | 0.0029 lb / ton wood output |

The Permittee shall use the monthly records to calculate the facility-wide VOC emissions during each calendar month. The Permittee shall notify the Division in writing if the facility-wide VOC 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 VOC emission limitation in Condition 2.1.

- 7.11 The Permittee shall calculate and record the amount of Total PM emissions from the entire facility in each calendar month, using the following equation:  
[391-3-1-.02(6)(b)1.]

$$ER_{PM} = [(EF_{PM/S1} * W_{DR}) + (EF_{PM/BLR}) * (H_{BLR}) + (EF_{PM/S2} * W_{COOL})] / 2,000$$

Where:

- $ER_{PM}$  = Monthly Total PM emission rate from the entire facility, in tons per month.
- $EF_{PM/S1}$  = Total PM emission factor for Stack S1, in lbs Total PM/ton wood, determined in the most recent performance tests per Condition 6.6g. Before the initial performance test is conducted, the Permittee is allowed to use the PM emission factor in Table 7.11 below.
- $W_{DR}$  = Monthly throughput of Dryers DRY1 – DRY3, combined, determined and recorded in accordance with Condition 7.6a.
- $EF_{PM/BLR}$  = U.S. EPA AP-42 PM emission factor for Boiler BLR, 7.6 lbs PM/MMcf NG.
- $H_{BLR}$  = Monthly natural gas consumption by Boiler BLR, in MMcf NG/mo, determined and recorded in accordance with Condition 7.6i.
- $EF_{PM/S2}$  = Total PM emission factor for Stack S2, in lbs Total PM/ton, determined in the most recent performance tests per Condition 6.6h. Before the initial performance test is conducted, the Permittee is allowed to use the PM emission factor in Table 7.11 below.
- $W_{COOL}$  = Monthly throughput of Coolers COOL1 and COOL2, combined, determined and recorded in accordance with Condition 7.6b.
- 2,000 = Conversion factor to convert pounds to tons.