

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

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

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Table 7.11: Total PM Emission Factor That Should Be Used Before Any Test Results Are Available

| Pollutant | Stack S1 (RTO Outlet) | Stack S2 (BIO Outlet) |
|-----------|---------------------------|--|
| | | ES/DRY1 – DRY3 DWB1 & DWB2 DHM1 – DHM8 |
| Total PM | 0.226lb / ton wood output | 0.119lbs / ton wood output |

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

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

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

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

Where:

- ER_{HAP} = Monthly HAP emission rate from the entire facility, in tons per month.
- EF_{HAP/S1} = Uncontrolled HAP emission factor prior to RTO, in lbs HAP/ton wood, determined in the most recent performance tests per Condition 6.6i. Before the initial performance test is conducted, the Permittee is allowed to use the HAP emission factor in Table 7.12 below.
- W_{DR} = Monthly throughput of Dryers DRY1 – DRY3, combined, determined and recorded in accordance with Condition 7.6a.
- 50 = Multiply factor when dryer HAP emissions are not controlled by RTO.
- %DT = RTO percent down time, in percentage. Since RTO does not control HCl, %DT for HCl is always 0%.
- 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_{HAP/BLR} = U.S. EPA AP-42 HAP emission factor for Boiler BLR, 1.8 lbs hexane/MMcf NG (single HAP) and 1.89 lbs combined HAP/MMcf NG.