PERMIT AMENDMENT NO. 2421-065-0016-V-02-2
ISSUANCE DATE: 12/04/2024

GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: **Conner Holdings, LLC**

Facility Address: **4153 Bypass Rd**
Homerville, Georgia 31634 Clinch County

Mailing Address: **P.O. Box 208**
Homerville, Georgia 31634

Parent/Holding Company: **Conner Holdings, LLC**

Facility AIRS Number: **04-13-065-00016**

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:
A wood pellet manufacturing operation at the existing lumber mill.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-065-0016-V-02-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **823591** dated **February 14, 2024 (updated May 16, 2024)**; any other applications upon which this Amendment or Permit No. 2421-065-0016-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **21** pages.

Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.4 Process Description of Modification

Conner Holdings, LLC (hereinafter "facility") plans to install a pelletizing system to further process their wood chips generated by the existing Sawmill (ID No. SAW) and the shavings generated by the existing Planer Mill (ID No. PLM1). The transfer of the wood chips and shavings will be accomplished via loaders.

Green Wood Processing and Material Drying
The green wood chips from the Sawmill will be transferred to the Green Hammermill Screener (ID No. PLS1). The larger chips will go to the Green Hammermill (ID No. HM01), which will shred the chips into green shreddings. The shredded wood will then be dried using the indirect heat from a proposed 30.0 MMBtu/hr natural gas fired Boiler (ID No. BL01). The moisture rich exhaust gases are anticipated to be mixed with particulate matter ($PM/PM_{10}/PM_{2.5}$), volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), and this exhaust stream will be exhausted to the outdoor atmosphere on an uncontrolled basis through two parallel dryer stacks.

Wood Pelletizing Lines
The dried wood material is transferred via mechanical conveyance into one of the two dry hammermills (ID Nos. HM02 and HM03) that process the dried material to the desired size. The shavings from the existing Planer Mill will be mechanically conveyed to one of the proposed dry hammermills as well. Each dry hammermill exhausts to the outdoor atmosphere through its own cyclone (ID Nos. HM02/PLC1 and HM03/PLC2).

In the pelletizing area there are five pellet mills which receive dried materials from the two dry hammermills via the dry hammermill cyclones. In each pellet mill, rollers push the material through the holes of a die plate. Knives on the exterior of the die plate cut the wood pellets from the plate once the pellets achieve the required length. An exhaust system at the discharge of the pellet mills (combined) will pneumatically convey the exhaust heat and moisture to cyclone with ID No. PLC3.

Wood pellets from each pelletizing line are discharged into one pellet cooler (PC01). Wood pellets enter the cooling chamber and flow countercurrent to a stream of ambient air introduced in the cooler. The air flow reduces the temperature of the wood pellets at the point of pellet discharge. The captured exhaust is routed to cyclone with ID No. PLC4, and this exhaust gas system will be uncontrolled for VOC and HAP emissions.

Cyclones with ID Nos. PLC3 and PLC4 will exhaust to the outdoor atmosphere through a common stack.

Materials collected in cyclone with ID No. PLC3 will be too wet to be recycled into pellets, but it will be reused elsewhere at the facility. Materials collected in cyclone with ID No. PLC4 can be recycled to be repelletized.

Screening Process
There will be three parts of the proposed project where there are screening operations. There will be a Green Hammermill Screener (ID No. PLS1), Dry Hammermill Screener (ID No. PLS2), and a Pellet Sifter (ID No. PLS3). Screening operations result in fugitive PM emissions.

Pellet Storage and Loadout

Wood pellets will be mechanically conveyed directly to final storage (ID No. PST1). From the storage piles, the pellets are loaded onto trucks to be sold.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

New Condition

2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any single hazardous air pollutant which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any twelve consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive months.
[Avoidance of Major Source MACT per 40 CFR 63]

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

Modified Condition

3.1 Updated Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
DK01	Continuous Direct-Fired Lumber Kiln with Green Sawdust/Natural Gas Fired Burner rated at 40 MMBtu/hr	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)	N/A	N/A
PCH1	Planer Mill Chipper 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.	PCY1	**Planer Mill Cyclone 1**
HM01	**Green Hammermill Max. Input Rate = 227,919 tons per year**	**391-3-1-.02(2)(n)**	**N/A**	**N/A**
DR01	**Belt Dryer Max. Input Rate=139,284 tons per year**	**391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.**	**N/A**	**N/A**
BL01	**30 MMBtu/hr Natural Gas Fired Boiler**	**391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc**	**N/A**	**N/A**
HM02	**Dry Hammermill 1 Max. Input Rate=98,550 tons per year**	**391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.**	**PLC1**	**Dry Hammermill Cyclone 1**
HM03	**Dry Hammermill 2 Max. Input Rate=98,550 tons per year**	**391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.**	**PLC2**	**Dry Hammermill Cyclone 2**
PL01-PL05	**Pellet Mills 1 through 5 Total Max. Input Rate=197,100 tons per year**	**391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.**	**PLC3**	**Pellet Mill Cyclone**
PC01	**Pellet Cooler Max. Input Rate=197,100 tons per year**	**391-3-1-.02(2)(b) 391-3-1-.02(2)(e)1.**	**PLC4**	**Pellet Cooler Cyclone**
PST1	**Pellet Storage**	**391-3-1-.02(2)(n)**	**N/A**	**N/A**

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

Deleted Condition

3.1.1 Deleted.

3.2 Equipment Emission Caps and Operating Limits

New Condition

3.2.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the Belt Dryer (ID No. DR01), the Boiler (ID No. BL01), the Dry Hammermills (ID Nos. HM02 & HM03), the Pellet Mills (ID Nos. PL01-PL05), and the Pellet Cooler (ID No. PC01), combined, volatile organic compounds (VOCs) in an amount equal to or exceeding 249 tons during any consecutive twelve-month period.
[Avoidance of 40 CFR 52.21]

New Condition

3.2.5 The Permittee shall operate and maintain the cyclones (ID Nos. PCY1, PLC1, PLC2, PLC3, and PLC4) during all periods of operation when the associated emission units are in operation.
[Avoidance of 40 CFR 52.21 for PLC1 through PLC4 and Georgia Rule 391-3-1-.02(2)(e)-Subsumed]

New Condition

3.2.6 The Permittee shall only fire natural gas in the Boiler (ID No. BL01).
[Avoidance of 40 CFR 63 Subpart JJJJJJ and 391-3-1-.02(2)(g)-Subsumed]

New Condition

3.2.7 The Permittee shall not produce more than 139,284 tons of wood in the Belt Dryer (ID No. DR01) during any consecutive twelve-month period.
[Georgia Air Toxics Guideline]

New Condition

3.2.8 The Permittee shall not produce more than 197,100 tons of dry wood in the Pellet Mills (ID Nos. PL01-PL05) during any consecutive twelve-month period.
[Georgia Air Toxics Guideline]

3.3 Updated Equipment Federal Rule Standards

New Condition

3.3.1 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units," for operation of the Boiler (ID No. BL01).
[40 CFR 60 Subparts A and Dc]

3.4 Equipment SIP Rule Standards

New Condition

3.4.5 The Permittee shall not cause, let, suffer, permit, or allow any emissions from the Boiler (ID No. BL01) which:

a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from $P = 0.5(10/R)^{0.5}$ where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU.
[391-3-1-.02(2)(d)2.(ii)]

b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Modified Condition

3.5.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.
[391-3-1-.02(6)(b)1.(i)]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

Modified Condition

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

a. Method 1 shall be used for the determination of sample point locations.

b. Method 2 shall be used for the determination of stack gas flow rate.

c. Method 3 or 3A shall be used for the determination of stack gas molecular weight. Method 3B shall be used for the determination of emission rate correction factor or excess air. Method 3A may be used as an alternative.

d. Method 4 shall be used for the determination of stack gas moisture.

e. Method 5 for the determination of particulate matter emissions, and in conjunction with Method 202 as deemed appropriate by the Division.

f. Methods 201A and 202 shall be used for determination of total particulate matter, PM_{10}, and $PM_{2.5}$. As an alternative, Methods 5 and 202 may be used.

g. Method 19 shall be used when applicable; to convert particulate matter, carbon monoxide, and nitrogen oxides concentrations (i.e., grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to mass emission rates (i.e., lb/hr).

h. **Interim VOC Measurement Protocol for the Wood Products Industry – July 2007 (hereinafter "EPA OTM-26" or "WPP1 Products Protocol 1 VOC") shall be used for the determination and summation of VOC concentration via the following equation:**

VOC (ppm as propane) = Method 25A VOC (as propane) + Methanol (as MeOH) + Formaldehyde (as HCHO) – (0.65 x Methanol (as propane)).

i. Method 25A shall be used for the determination of VOC concentrations.

j. Method 308, Method 320, NCASI Method CI/WP-98.01, or NCASI Method IM/CAN/WP-99.02 shall be used for the determination of Methanol concentrations.

k. Method 316, Method 320, NCASI Method CI/WP-98.01; or NCASI Method IM/CAN/WP-99.02 shall be used for the determination of Formaldehyde concentrations.

l. NCASI 99.02 or SW 846 Method 0011 shall be used for the determination of Acetaldehyde concentrations.

m. Method 320 shall be used for the determination of Acrolein concentrations.

n. Method 320 shall be used for the determination of Phenol concentrations.

o. Method 320 shall be used for the determination of Propionaldehyde concentrations.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.
[391-3-1-.02(3)(a)]

4.2 Updated Specific Testing Requirements

New Condition

4.2.1 Within 180 days of start-up of the wood pellet manufacturing operation, the Permittee shall conduct performance tests to determine and record the average VOC emissions in *pound VOC as propane per ton of product*, for the following emission units. Subsequent performance testing shall be conducted within 37 months of the previous performance tests. During the performance testing, the Permittee shall determine and record the hourly mass (tons) of material that is processed in each tested unit, separately. The tests shall be conducted at the maximum anticipated hourly production rate of each tested emission unit. All required continuous monitoring system(s) shall be installed, calibrated, and operating when tests are conducted. The results of the performance test(s) shall be submitted to the Division within sixty (60) days of the completion of testing.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

a. The Belt Dryer (ID No. DR01).

b. The Dry Hammermills (ID Nos. HM02 and HM03). The Permittee only needs to conduct testing for the ID No. HM02/PLC1 or ID No. HM03/PLC2. The resulting average VOC emission rate in pound per hour (lb/hr) shall be divided by the hourly throughput of the tested dry hammermill (in ODT/hr) for purposes of computing actual VOC emissions from the Dry Hammermills in pound per ton (lb/ODT).

c. The common exhaust of the Pellet Mills (ID Nos. PL01-PL05) and the Pellet Cooler (ID No. PC01). The Permittee shall record the number of pellet mills in operation during the performance tests.

New Condition

4.2.2 Within 180 days of initial start-up of the wood pellet manufacturing operation, the Permittee shall conduct performance tests for the pollutants listed in subparagraphs a. through f. Subsequent performance testing shall be conducted within 37 months of the previous performance tests. The Permittee shall determine and record the average individual HAP emission rate in pounds HAP per ton (or ODT, as applicable) of product, for the Belt Dryer (ID No. DR01), the Dry Hammermills (ID No. HM02 and HM03), and the common exhaust of the Pellet Mills/Pellet Cooler (ID Nos. PL01, PL02, PL03, PL04, PL05, and PC01). Testing is required for either HM02 or HM03 as representative of the Dry Hammermills group. The resulting average HAP emission rate (in lb/hr) shall be divided by the hourly throughput of the tested dry hammermill (in ODT/hr) for purposes of computing actual HAP emissions from the Dry Hammermills (in lb/ODT). During the performance testing, the Permittee shall determine and record the following: (1) the mass of material (tons or ODT as applicable) that is produced by each tested unit, separately; and (2) the number of pellet mills in operation. The tests shall be conducted at the maximum anticipated production rate of each tested emission unit. All required continuous monitoring system(s) shall be installed, calibrated, and operating when tests are conducted. The results of the performance test(s) shall be submitted to the Division within sixty (60) days of the completion of testing.
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

a. Acetaldehyde;

b. Acrolein;

c. Formaldehyde;

d. Methanol;

e. Phenol; and

f. Propionaldehyde.

New Condition

4.2.3 Within 180 days of startup of the wood pellet manufacturing operation, the Permittee shall conduct performance tests to determine and record the average filterable PM (FPM) emission rate, total PM_{10} emission rate, and total $PM_{2.5}$ emission rate for the following emission units in the unit of lb/ton or lb/ODT product. During the performance testing, the Permittee shall determine and record the hourly mass (in tons or ODT as applicable) of material that is produced by each tested unit, separately. The tests shall be conducted at the maximum anticipated hourly production rate of each tested emission unit. All required continuous monitoring system(s) shall be installed, calibrated, and operating when tests are conducted. The results of the performance test(s) shall be submitted to the Division within sixty (60) days of the completion of testing.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

a. The Belt Dryer (ID No. DR01).

b. The Dry Hammermills (ID No. HM02 and HM03). The Permittee only needs to conduct testing for the ID No. HM02/PLC1 or ID No. HM03/PLC2.

c. The common exhaust of the Pellet Mills (ID Nos. PL01-PL05) and the Pellet Cooler (ID No. PC01). The Permittee shall record the number of pellet mills in operation during the performance tests.

New Condition

4.2.4 If any of the FPM/TotalPM_{10}/Total$PM_{2.5}$ test results obtained in accordance with Condition 4.2.3 exceeds the corresponding emission factors in the following table, the Permittee shall submit a notification within 180 days after testing, explaining how the modification requested in Application No. 823591 would not trigger a PSD review for PM/PM_{10}/$PM_{2.5}$.using the higher test results.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

Table 4.2.4: Emission Factors Used in Application No. 823591

Pollutant	DR01	HM02/HM03	PL01-PL05, PC01 Common Stack
FPM/TotalPM_{10}/Total$PM_{2.5}$	0.291 lb/ton	0.200 lb/ODT	0.152 lb/ton

New Condition

4.2.5 Should production rates increase above the rates at which the acceptable performance test(s) required by Condition Nos. 4.2.1, 4.2.2, and/or 4.2.3 were made, the Division may require that the testing required by Condition Nos. 4.2.1, 4.2.2, and/or 4.2.3 be tested at a higher production rate.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

Modified Condition

5.2.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. A differential pressure indicator on cyclone with ID No. PCY1 for measuring the differential pressure across the said cyclone. Data shall be recorded on each shift or portion of each shift that the associated emissions unit is operated. The record shall note if the associated emissions unit does not operate.

b. A differential pressure indicator on cyclone with ID No. PLC1 for measuring the differential pressure across the said cyclone. Data shall be recorded on each shift or portion of each shift that the associated emissions unit is operated. The record shall note if the associated emissions unit does not operate.

c. A differential pressure indicator on cyclone with ID No. PLC2 for measuring the differential pressure across the said cyclone. Data shall be recorded on each shift or portion of each shift that the associated emissions unit is operated. The record shall note if the associated emissions unit does not operate.

d. A differential pressure indicator on cyclone with ID No. PLC3 for measuring the differential pressure across the said cyclone. Data shall be recorded on each shift or portion of each shift that the associated emissions unit is operated. The record shall note if the associated emissions unit does not operate.

e. A differential pressure indicator on cyclone with ID No. PLC4 for measuring the differential pressure across the said cyclone. Data shall be recorded on each shift or portion of each shift that the associated emissions unit is operated. The record shall note if the associated emissions unit does not operate.

Modified Condition

5.2.2 The Permittee shall perform the following operation and maintenance checks and retain a record suitable for inspection or submittal for each week or portion of each week of operation of the cyclones (ID Nos. PCY1, PLC1, PLC2, PLC3, and PLC4). A checklist or other similar log may be used for this purpose. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken. These records shall be kept in a form suitable for inspection or submittal to the Division.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Check exterior of the cyclones for holes in the body or evidence of malfunction in interior of the cyclones.

b. Check hopper for bridging and plugging.

c. Check screw conveyor (or other particulate transfer device) for proper operation to ensure dust removal.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

Modified Condition

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

i. Any consecutive twelve-month total of any single HAP or total HAP emissions from the facility, that is equal to or exceeding 10 tons or 25 tons, respectively.

ii. Any consecutive twelve-month period for which the VOC emissions from the Belt Dryer (ID No. DR01), the Boiler (ID No. BL01), the Dry Hammermills (ID Nos. HM02 and HM03), the Pellet Mills (ID Nos. PL01-PL05), and the Pellet Cooler (ID No. PC01), combined, is equal to or exceeds 249 tons.

iii. Any consecutive twelve-month period for which the total amount of wood products processed by Dry Kiln 1 (ID No. DK01), as determined in accordance with Conditions 6.2.3 and 6.2.4, exceeds 100 million board feet.

iv. Any consecutive twelve-month period for which the total amount of wood products processed by the Belt Dryer (ID No. DR01) exceeds 139,284 ODT.

v. Any consecutive twelve-month period for which the total amount of wood products processed by the Pellet Mills/Pellet Cooler (ID Nos. PL01-PL05, PC01) exceeds 197,100 tons.

c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

i. Any time the pressure drop recorded in accordance with Condition 5.2.1 is outside the cyclone manufacturer recommended pressure drop range.

ii. Any failure to carry out an inspection required by Condition 5.2.2.

iii. Any adverse condition(s) discovered by weekly inspections of the cyclones (ID Nos. PCY1, PLC1, PLC2, PLC3, and PLC4) required by Condition 5.2.2, which is not corrected within 24 hours of discovery.

iv. Any time Dry Kiln with ID No. DK01 power vents are not operated when said kiln is in operation.

6.2 Specific Record Keeping and Reporting Requirements

New Condition

6.2.5 The Permittee shall determine and record the following monthly records. These records shall be maintained in a form suitable for inspection by or submittal to the Division. [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

a. PR_{DK01}:The monthly amount (1,000 board feet or Mbf) of wood produced by the Dry Kiln (DK01), per Condition 6.2.3.

b. PR_{HM01}: The monthly mass (ODT) of wood produced by the Green Hammermill (ID No. HM01).

c. PR_{DR01}: The monthly mass (tons) of wood produced by the Belt Dryer (ID No. DR01).

d. PR_{HM}: The monthly mass (ODT) of wood produced by the Dry Hammermills (ID Nos. HM02 and HM03), on a combined basis.

e. PR_{PMPC}: The monthly mass (tons) of wood produced by the Pellet Mills/Pellet Cooler (ID Nos. PL01-PL05, PC01).

f. PR_{PST1}: The monthly mass (tons) of wood pellets stored in the wood pellet warehouse (ID No. PST1).

g. $Fuel_{BL01}$: The monthly volume of natural gas combusted in the Boiler (ID No. BL01) in million standard cubic feet.
[40 CFR 60.48c(g)(2)]

h. $Fuel_{DK01, NG}$: The monthly volume of natural gas combusted in the Dry Kiln (ID No. DK01) in million standard cubic feet.

i. $Fuel_{DK01, Wood}$: The monthly amount of wood combusted in the Dry Kiln (ID No. DK01) in million Btu.

Verification of Compliance with Condition 3.2.4.

New Condition

6.2.6 The Permittee shall determine and record the mass of VOC emissions from the Belt Dryer (ID No. DR01), the Boiler (ID No. BL01), the Dry Hammermills (ID Nos. HM02 and HM03), the Pellet Mills (ID Nos. PL01-PL05), and the Pellet Cooler (ID No. PC01), on a combined monthly basis, using the following equation, the records required by Condition 6.2.5, and the emission factors in Condition 6.2.7. The records shall be maintained in a form suitable for inspection by or submittal to the Division.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

$$VOC\ (tons/month)=\{(EF01_{DR01})*(PR_{DR01})+(EF01_{HM})*(PR_{HM})+(EF01_{PMPC})*(PR_{PMPC})+(EF01_{BL01})*(Fuel_{BL01})\}/2{,}000$$

Where:

$EF01_{DR01}$ = VOC emission factor for the Belt Dryer in pound per ton of material (lb/ton)

$EF01_{HM}$ = VOC emission factor for the Dry Hammermill, in pound per oven dried ton (lb/ODT)

$EF01_{PMPC}$ = VOC emission factor for the combined exhaust of the Pellet Mills/Pellet Cooler, in lb/ton

$EF01_{BL01}$ = VOC emission factor for the combustion of natural gas in the Boiler in pounds per million standard cubic feet

PR_{DR01} = Monthly throughput in tons for the Belt Dryer, per Condition 6.2.5.c.

PR_{HM} = Monthly throughput in ODT for the Dry Hammermills, on a combined basis, per Condition 6.2.5.d.

PR_{PMPC} = Monthly throughput in tons for the Pellet Mills/Pellet Cooler per Condition 6.2.5.e.

$Fuel_{BL01}$ = Monthly usage of natural gas in the Boiler in million standard cubic feet per Condition 6.2.5.g.

New Condition

6.2.7 The VOC Emission Factors to be used in Condition 6.2.6 are specified in Table 6.2.7:
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3(i)

Table 6.2.7 VOC Emission Factors

	DR01 (i=DR01)	BL01 (i=BL01)	HM02/HM03 (i=HM)	PL01-PL05/PC01 (i=PMPC)
VOC	1.36 lb/ton	5.5 lb/MMscf	0.62 lb/ODT	2.1 lb/ton

Note: VOC from the Belt Dryer (ID No. DR01), the Dry Hammermills (ID Nos. HM02/HM03), and the Pellet Mills/Pellet Coolers (ID Nos. PL01-PL05, PC01), each, is based on Conditions 4.1.3 and 4.2.1 and is VOC (as propane) = Method 25A VOC (as propane) + Methanol (as MeOH) + Formaldehyde (as HCHO) – (0.65 x Methanol (as propane)).

New Condition

6.2.8 The Permittee shall notify the Division in writing if the VOC emissions from the Belt Dryer (ID No. DR01), the Boiler (ID No. BL01), the Dry Hammermills (ID Nos. HM02 and HM03), and the Pellet Mills/Pellet Cooler (ID Nos. PL01-PL05, PC01), combined, equal or 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 emission limitation in Condition 3.2.4. The records shall be maintained in a format suitable for inspection or submittal to the Division.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

New Condition

6.2.9 The Permittee shall notify the Division in writing if the VOC emissions from the Belt Dryer (ID No. DR01), the Boiler (ID No. BL01), the Dry Hammermills (ID Nos. HM02 and HM03), and the Pellet Mills/Pellet Cooler (ID Nos. PL01-PL05, PC01), combined, equal or exceed 249 tons during any consecutive twelve-month period. The consecutive twelve-month total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. 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 emission limitation in Condition 3.2.4. The records shall be maintained in a format suitable for inspection or submittal to the Division.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

New Condition

6.2.10 If the results of the VOC performance test(s), per Condition 4.2.1, exceed the corresponding VOC emission factor(s) being used per Table 6.2.7, then the Permittee shall calculate VOC emissions using the new and higher factor(s) starting on the test date. In addition, within 180 days after testing, the Permittee shall submit a permit application requesting the higher emission factors be incorporated in the permit or a demonstration that the emission factor(s) derived are not representative of normal emissions.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

Verification of Compliance with Condition 2.1.1.

New Condition

6.2.11 The Permittee shall calculate and record the mass of individual HAPs and total HAPs from the Dry Kiln (ID No. DK01), Green Hammermill (HM01), the Belt Dryer (ID No. DR01), the Dry Hammermills (ID Nos. HM02 and HM03), the Pellet Mills/Pellet Cooler (PL01-PL05/PC01), the Boiler (ID No. BL01), and the final pellet storage (ID No. PST1), on a combined basis, using the following equations, the records required by Condition 6.2.5, and the emission factors in Condition 6.2.12. The single HAPs to be considered include acetaldehyde, acrolein, arsenic, formaldehyde, hexane, hydrogen chloride, methanol, phenol, and propionaldehyde. The records shall be maintained in a form suitable for inspection by or submittal to the Division.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

Acetaldehyde (tons/month) =
$\{(EF02_{DR01})*(PR_{DR01})+(EF02_{HM})*(PR_{HM})+(EF02_{PMPC})*(PR_{PMPC})+(EF02_{DK01})*(PR_{DK01})+(EF02_{HM01})*(PR_{HM01})+(EF02_{PST1})*(PR_{PST1})\}/2{,}000$

Acrolein (tons/month) =
$\{(EF03_{DR01})*(PR_{DR01})+(EF03_{HM})*(PR_{HM})+(EF03_{PMPC})*(PR_{PMPC})+(EF03_{DK01})*(PR_{DK01})+(EF03_{HM01})*(PR_{HM01})+(EF03_{PST1})*(PR_{PST1})\}/2{,}000$

Formaldehyde (tons/month) =
$\{(EF05_{DR01})*(PR_{DR01})+(EF05_{HM})*(PR_{HM})+(EF05_{PMPC})*(PR_{PMPC})+(EF05_{DK01})*(PR_{DK01})+(EF05_{HM01})*(PR_{HM01})+(EF05_{PST1})*(PR_{PST1}) + (EF05_{BL01})*(Fuel_{BL01})\}/2{,}000$

Methanol (tons/month) =
$\{(EF08_{DR01})*(PR_{DR01})+(EF08_{HM})*(PR_{HM})+(EF08_{PMPC})*(PR_{PMPC})+(EF08_{DK01})*(PR_{DK01})+(EF08_{HM01})*(PR_{HM01})+(EF08_{PST1})*(PR_{PST1})\}/2{,}000$

Phenol (tons/month) =
$\{(EF09_{DR01})*(PR_{DR01})+(EF09_{HM})*(PR_{HM})+(EF09_{PMPC})*(PR_{PMPC})+(EF09_{DK01})*(PR_{DK01})+(EF09_{HM01})*(PR_{HM01})+(EF09_{PST1})*(PR_{PST1})\}/2{,}000$

Propionaldehyde (tons/month) =
$\{(EF10_{DR01})*(PR_{DR01})+(EF10_{HM})*(PR_{HM})+(EF10_{PMPC})*(PR_{PMPC})+(EF10_{DK01})*(PR_{DK01})+(EF10_{HM01})*(PR_{HM01})+(EF10_{PST1})*(PR_{PST1})\}/2{,}000$

Arsenic (tons/month) = $\{(EF04_{DK01,NG})*(Fuel_{DK01,NG})+(EF04_{DK01,Wood})*(Fuel_{DK01,Wood})+(EF04_{,BL01})*(Fuel_{BL01})\}/2{,}000$

Hexane (tons/month) = $\{(EF06_{DK01,NG})*(Fuel_{DK01,NG})+(EF06_{,BL01})*(Fuel_{BL01})\}/2{,}000$

Hydrogen Chloride (tons/month) = $\{(EF07_{DK01,Wood})*(Fuel_{DK01,Wood})\}/2{,}000$

Total HAPs (tons/month)=Acetaldehyde + Acrolein + Arsenic + Formaldehyde + Hexane + Hydrogen Chloride + Methanol + Phenol + Propionaldehyde

Where:

$EF02_i$	=	Acetaldehyde Emission Factor per applicable equipment
$EF03_i$	=	Acrolein Emission Factor per applicable equipment
$EF04_{i,NG}$	=	Arsenic Emission Factor per applicable equipment that combusts natural gas
$EF04_{i,Wood}$	=	Arsenic Emission Factor per applicable equipment that combusts wood
$EF05_i$	=	Formaldehyde Emission Factor per applicable equipment
$EF06_{i,NG}$	=	Hexane Emission Factor per applicable equipment that combusts natural gas
$EF07_{i,Wood}$	=	Hydrogen Chloride Emission Factor per applicable equipment that combusts wood
$EF08_i$	=	Methanol Emission Factor per applicable equipment
$EF09_i$	=	Phenol Emission Factor per applicable equipment
$EF010_i$	=	Propionaldehyde Emission Factor per applicable equipment
PR_{DK01}	=	Monthly throughput in Mbf for the Dry Kiln, per Condition 6.2.5a.
PR_{HM01}	=	Monthly throughput in tons for the Green Hammermill, per Condition 6.2.5b.
PR_{DR01}	=	Monthly throughput in tons for the Belt Dryer, per Condition 6.2.5c.

PR_{HM} = Monthly throughput in ODT for the Dry Hammermills, on a combined basis, per Condition 6.2.5d.
PR_{PMPC} = Monthly throughput in tons for the Pellet Mills/Pellet Cooler per Condition 6.2.5e.
PR_{PST1} = Monthly throughput for the Pellet Final Storage per Condition 6.2.5f.
$Fuel_{BL01}$ = Monthly usage of natural gas in the Boiler in million standard cubic feet per Condition 6.2.5g.
$Fuel_{DK01,NG}$ = Monthly natural gas combusted by the Kiln in million standard cubic feet (MMcf) per Condition 6.2.5h.
$Fuel_{DK01,Wood}$ = Monthly wood combusted by the Kiln in MMBtu per Condition 6.2.5i.

New Condition

6.2.12 The Individual HAP Emission Factors to be used in Condition 6.2.11 are specified in Tables 6.2.12.A through 6.2.12.B:
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

Table 6.2.12.A-Individual HAP Emission Factors

Emission Point / Pollutant	Emission Factor Reference	DK01 (i=DK01)	HM01 (i=HM01)	BL01 (i=BL01)	PST1 (i=PST1)
Acetaldehyde	$EF02_i$	0.045 lb/Mbf	3.23E-04 lb/ODT	--	1.00E-04 lb/ton
Acrolein	$EF03_i$	6.00E-03 lb/Mbf	7.50E-05 lb/ODT	--	1.05E-05 lb/ton
Arsenic-Natural Gas Combustion	$EF04i_{,NG}$	2.0E-04 lb/MMscf	--	2.00E-04 lb/MMscf	--
Arsenic-Wood Combustion	$EF04_{i, Wood}$	2.2E-05 lb/MMBtu	--	--	--
Formaldehyde	$EF05_i$	0.0386 lb/Mbf	6.45E-04 lb/ODT	7.50E-02 lb/MMscf	2.43E-04 lb/ton
Hexane-Natural Gas Combustion	$EF06_{i,NG}$	1.8 lb/MMscf	--	1.8 lb/MMscf	--
Hydrogen Chloride-Wood Combustion	EF07i,Wood	1.90E-02 lb/MMBtu	--	--	--
Methanol	$EF08_i$	0.161 lb/Mbf	3.23E-04 lb/ODT	--	5.00E-04 lb/ton
Phenol	$EF09_i$	0.0103 lb/Mbf	1.29E-04 lb/ODT	--	1.80E-05 lb/ton
Propionaldehyde	$EF10_i$	2.92E-03 lb/Mbf	3.65E-05 lb/ODT	--	5.10E-06 lb/ton

Table 6.2.12.B-Individual HAP Emission Factors

Emission Point / Pollutant	Emission Factor Reference	DR01 (i=DR01)	HM02/HM03 (i= HM)	PL01-PL05/PC01 (i=PMPC)
Acetaldehyde	$EF02_i$	1.94E-02 lb/ton	4.00E-03 lb/ODT	2.00E-03 lb/ton
Acrolein	$EF03_i$	6.40E-03 lb/ton	9.30E-04 lb/ODT	1.28E-02 lb/ton
Formaldehyde	$EF05_i$	9.71E-02 lb/ton	8.00E-03 lb/ODT	2.33E-03 lb/ton
Methanol	$EF08_i$	2.84E-02 lb/ton	4.00E-03 lb/ODT	7.40E-03 lb/ton
Phenol	$EF09_i$	1.94E-02 lb/ton	1.60E-03 lb/ODT	1.70E-02 lb/ton
Propionaldehyde	$EF10_i$	2.10E-03 lb/ton	4.52E-04 lb/ODT	4.20E-03 lb/ton

6.2.13 The Permittee shall notify the Division in writing if emissions of any individual HAP emissions (acetaldehyde, acrolein, arsenic, formaldehyde, hexane, hydrogen chloride, methanol, phenol, and propionaldehyde) equal or exceed 0.83 tons from the entire facility, or if emissions of said listed hazardous air pollutants combined equal or exceed 2.08 tons from the entire facility, 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 emission limit in Condition 2.1.1.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.14 The Permittee shall use the monthly records required by Condition 6.2.13 to determine and record the consecutive twelve-month period total emissions of each individual HAP (acetaldehyde, acrolein, arsenic, formaldehyde, hexane, hydrogen chloride, methanol, phenol, and propionaldehyde) for each month and the twelve-month rolling total combined HAP emissions for each month from the entire facility for each calendar month. The consecutive twelve-month total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if the combined HAP emissions from the entire facility equal or exceed 25 tons and/or any individual HAP equals or exceeds 10 tons during any consecutive twelve-month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.1.1.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.15 If the result(s) of the individual HAP performance test(s), per Condition 4.2.2, exceed the corresponding individual HAP emission factor(s) currently being used per Tables 6.2.12.A and 6.2.12.B, then the Permittee shall calculate applicable individual HAP emissions using the new and higher factor(s) starting on the test date. In addition, within 180 days after testing, the Permittee shall submit a permit application requesting the higher emission factors be incorporated in the permit or a demonstration that the emission factors derived are not representative of normal emissions.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Verification of Compliance with Condition 3.2.7

6.2.16 The Permittee shall notify the Division in writing if production through the Belt Dryer (ID No. DR01) exceeds 11,607 tons during any calendar month based on Condition 6.2.5.c. 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 production limit in Condition 3.2.7.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.17 The Permittee shall use the monthly records required by Condition 6.2.16 to determine and record the consecutive twelve-month period total production through the Belt Dryer (ID No. DR01). The consecutive twelve-month total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if the total production rate in any consecutive twelve-month period exceeds 139,284 tons. 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 production limit in Condition 3.2.7 or maintain compliance with the Georgia Air Toxics Guideline.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Verification of Compliance with Condition 3.2.8

6.2.18 The Permittee shall notify the Division in writing if the production through the Pellet Mills (ID Nos. PL01-PL05) exceeds 16,425 tons during any calendar month based on Condition 6.2.5.e. 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 production limit in Condition 3.2.8.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.19 The Permittee shall use the monthly records required by Condition 6.2.18 to determine and record the consecutive twelve-month period total production through the Pellet Mills (ID Nos. PL01-PL05). The consecutive twelve-month total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if the total production rate in any consecutive twelve-month period exceeds 197,100 tons. 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 production limit in Condition 3.2.8 or maintain compliance with the Georgia Air Toxics Guideline.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

NSPS Dc Recordkeeping and Reporting Requirements

6.2.20 The Permittee shall submit notification of the date of construction or reconstruction and actual startup of the Boiler (ID No. BL01), as required by 40 CFR 60.7. This notification shall include all items specified in 40 CFR 60.48c(a).
[40 CFR 60.48c(a)]

6.2.21 The Permittee shall submit the fuel usage records required by Condition 6.2.5.g. as part of the report required by Permit Condition 6.1.4 as it pertains to the Boiler (ID No. BL01). If no fuel was combusted during the reporting period, the semiannual report shall so state.
[391-3-1-.02(6)(b)1; 40 CFR 60.48c(g)2.; and 40 CFR 70.6(a)(3)(i)]

Reporting Requirement

6.2.22 The Permittee shall submit written notification of startup of the wood pellet manufacturing operation, as defined in Application No. 823591, within 15 days after such date.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Attachments

A. List of Standard Abbreviations and List of Permit Specific Abbreviations
B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
C. List of References

ATTACHMENT A

List Of Standard Abbreviations

AIRS	Aerometric Information Retrieval System
APCD	Air Pollution Control Device
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BTU	British Thermal Unit
CAAA	Clean Air Act Amendments
CEMS	Continuous Emission Monitoring System
CERMS	Continuous Emission Rate Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System(s)
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic Meter
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act
gr	Grain(s)
GPM (gpm)	Gallons per minute
H_2O (H2O)	Water
HAP	Hazardous Air Pollutant
HCFC	Hydro-chloro-fluorocarbon
MACT	Maximum Achievable Control Technology
MMBtu	Million British Thermal Units
MMBtu/hr	Million British Thermal Units per hour
MVAC	Motor Vehicle Air Conditioner
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x (NOx)	Nitrogen Oxides
NSPS	New Source Performance Standards
OCGA	Official Code of Georgia Annotated

PM	Particulate Matter
PM_{10} (PM10)	Particulate Matter less than 10 micrometers in diameter
PPM (ppm)	Parts per Million
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2 (SO2)	Sulfur Dioxide
USC	United States Code
VE	Visible Emissions
VOC	Volatile Organic Compound

List of Permit Specific Abbreviations

Cf	Cubic feet

ODT	Oven-dried tons

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows: i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning: i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7 ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: i) Activity is performed indoors; & ii) No significant fugitive particulate emissions enter the environment; & iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity

ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Debarker (DB01)	1			√
Bag Plant for Screening and Bagging Bark (BP01)	1			√
Sawmill (SM01)-Indoors	1			√
Sawmill Chippers (SCH1 and SCH2)-Indoors	2			√
Sawmill Screener (SSC1)	2			√
Planer Mill (PM01)-Indoors	1			√
Pellet Sifter (PLS3)	1			√
Bark Storage Pile Loading	1			√
Bark Truck Loading	1			√
Woodchip Bin Loading	1			√
Woodchip Truck Loading	1			√
Sawdust Bin Loading	1			√
Sawdust Hopper Loading	1			√
Shavings Bin Loading	1			√
Shavings Truck Loading	1			√

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d).Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	

ATTACHMENT C

LIST OF REFERENCES

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.

2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.

3. ***Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.***

4. ***Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees***.

5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/ap42/index.html*.

6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/software/tanks/index.html*.

7. The Clean Air Act (42 U.S.C. 7401 et seq).

8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).

9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).