

Boiler means an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam or hot water. Controlled flame combustion refers to a steady-state, or near steady state, process wherein fuel and/or oxidizer feed rates are controlled. Waste heat boilers are excluded from this definition.

Therefore, the dryer and dryer burner are not subject to the requirements of NESHAP Subpart JJJJJJ.

4.5.6 40 CFR 63 Subpart QQQQQQ - Wood Preserving (Area Sources)

NESHAP Subpart QQQQQQ, *NESHAP for Wood Preserving Area Sources*, applies to area sources of HAP that conduct wood preserving operations. A wood preserving operation is defined by Subpart QQQQQQ as a pressure treatment process with use of a wood preservative containing chromium, arsenic, dioxins, or methylene chloride, where the preservative is applied to the wood product inside a retort or similarly closed vessel. The Adel Facility will not use any wood preservatives in the production of the wood pellets. Therefore, NESHAP Subpart QQQQQQ is not applicable.

4.5.7 Non-Applicability of All Other NESHAP

NESHAP standards are developed for particular industrial source categories, and the applicability of a particular NESHAP to a facility can be readily ascertained based on the industrial source covered. All other NESHAP are categorically not applicable to the facility.

4.6 Georgia Rules for Air Quality Control

In addition to federal air regulations, GRAQC 391-3-1 establishes regulations applicable at the emission unit level (source-specific) and at the facility level. The rules also contain requirements related to the need for construction and/or operating permits.

4.6.1 GRAQC 391-3-1-.02(2)(b) - Visible Emissions

This regulation limits the opacity from all sources to 40%, provided that the source is not subject to some other emission limitation under GRAQC 391-3-1-.02(2). This regulation is applicable to the RTO, emergency fire pump, and other operations at the Adel Facility. The dryer and dryer burner, however, are subject to another opacity limit under GRAQC 391-3-1-.02(2)(d).

4.6.2 GRAQC 391-3-1-.02(2)(d) - Fuel Burning Equipment

This regulation limits emissions from fuel burning equipment based on heat input capacity. Although NO_x limits only apply to units with heat input capacities greater than 250 MMBtu/hr, PM limits apply to all fuel-burning equipment.

Georgia defines fuel-burning equipment as:

...equipment the primary purpose of which is the production of thermal energy from the combustion of any fuel. Such equipment is generally that used for, but not limited to, heating water, generating or superheating steam, heating air as in warm air furnaces, furnishing process heat indirectly, through transfer by fluids or transmissions through process vessel walls.⁸

⁸ GRAQC 391-3-1-.01(cc)