Premier Pellets, LLC

616 Tenaha St.
Center, TX. 75935
(936)598-7800 fax 598-5500

May 6, 2010

Liz Bisbey-Kuehn

NMED Air Quality Bureau

1301 Siler Road
Building B

Santa Fe, NM 87507-3113

RE: Response to Requested Information

Dear Ms. Bisbey-Kuehn;

Premier Pellets is proposing to add additional structure, covering, or building areas to enclose the fugitive wood dust operations at our facility. This would include the areas of log sawing, future debarking, log shaving, and chipping operations to be incorporated as part of the current facility design.

Any wood dust particles generated as part of this operation will be contained and utilized inside the structure as part of the shavings bedding. These fugitive emissions will result in no emissions outside the facility, resulting in no impact of wood dust to the ambient air. Since there are no ambient emission sources of wood dust, we believe that no further analysis, modeling or otherwise, will need to be documented for the wood dust emissions.

We are providing the attached revised response document to the previous 8 questions to include "pass thru" emissions based on enclosure of the fugitive emissions. We hope this provides final clarification on the wood fugitive emissions.

If you require any other information, please let us know.

Sincerely,

Murray Mathews
President
Premier Pellets, LLC

Table 2-D: Maximum Uncontrolled Emissions (under normal operating conditions)[1]

☐ **This Table was intentionally left blank because it would be identical to Table 2-E.**

Maximum Uncontrolled Emissions are the uncontrolled emissions at maximum capacity, prior to (in the absence of) pollution control equipment. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. For each unit with flashing, list flashing emissions estimates as a separate line item (20.2.70.300.D.5 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.B.6, & 20.2.74.301 NMAC).

Unit No.	NOx		CO		VOC		SOx		TSP[2]		PM10[2]		PM2.5[2]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B3	4.40	13.61	3.40	14.85	0.34	1.49	0.50	2.18	11.20	48.92	10.00	43.68	8.60	37.56	N/A	N/A	N/A	N/A
Haul Road	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.74	11.88	0.70	3.03	0.08	0.33	N/A	N/A	N/A	N/A
Totals	4.40	13.61	3.40	14.85	0.34	1.49	0.50	2.18	13.94	60.80	10.70	46.71	8.68	37.90	0.00	0.00	0.00	0.00

[1] **Significant Figures:** All emission data throughout this application shall be expressed with a minimum of two significant figures.

[2] **Condensables:** Include condensable particulate matter emissions in particulate matter calculations.

Table 2-E: Requested Allowable Emissions[1]

Unit & stack numbering must be consistent throughout the application package. For each unit with flashing, list tank-flashing emissions estimates as a separate line item (20.2.70.300.D.5 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.B.6, & 20.2.74.301 NMAC).

Unit No.	NOx		CO		VOC		SOx		TSP[2]		PM10[2]		PM2.5[2]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B3	4.40	13.61	3.40	10.52	0.34	1.05	0.50	1.55	11.20	34.65	10.00	30.94	8.60	26.61	N/A	N/A	N/A	N/A
Haul Road	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.55	1.37	0.14	0.35	0.02	0.04	N/A	N/A	N/A	N/A
Totals	4.40	13.61	3.40	10.52	0.34	1.05	0.50	1.55	11.75	36.02	10.14	31.29	8.62	26.65	0.00	0.00	0.00	0.00

[1] **Significant Figures**: All emission data throughout this application shall be expressed with a minimum of two significant figures.

[2] **Condensables:** Include condensable particulate matter emissions in particulate matter calculations.

Table 2-I: Stack Exit Emission Rates for HAPs and TAPs

Specify the name of the TAP as listed in 20.2.72.502 NMAC and HAP as it appears in Section 112 (b) of the 1990 CAAA. 20.2.72.402.C NMAC lists sources that are exempt from the permitting requirements of 20.2.72.400-499. Only list TAPs that have a maximum uncontrolled emissions rate greater than the threshold emission rate listed in 20.2.72.502, Tables A and B. Unit and stack numbering must correspond throughout the application package. Include tank-flashing emissions estimates of HAPs and TAPs in this table.

Stack No.	Unit No.(s)	Total HAPs		HAP or TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
N/A	3	NA	NA	NA	NA														
N/A	5	NA	NA	NA	NA														
N/A	8	NA	NA	NA	NA														
N/A	C1	NA	NA	NA	NA														
Totals:		0.00	0.00	0.00	0.00														

Table 2-O: Parametric Emissions Measurement Equipment

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Unit No.	Parameter/Pollutant Measured	Location of Measurement	Unit of Measure	Acceptable Range	Frequency of Maintenance	Nature of Maintenance	Method of Recording	Averaging Time
B3	Exhaust from burner/drier	Exhaust after burner / drier	Visible emissions	20%	During facility operation	Adjust Webb's burner to optimal condition	Visible emissions recorded daily and after maintenance	1 hr

Chipper - Unit C1

Premier Shaving and Pellet Facility

Manufacturer: To be determine

Max Capacity: 90 tpd (maximum 1 logs/10 sec x 60 sec/min x 60 min/hr)

5.3 tph (90 tpd ÷ 17 hr/day = 5.3 tph)

Operations: 17 hr/day

7 day/week

52 week/yr

6188 hr/yr

Uncontrolled

	PM10	[5]PM2.5	TSP	
[1]Emission Factors	0.05	0.005	0.05	
	lb/tons	lb/tons	lb/tons	
[2]Lb/hr	0.26	0.03	0.26	NOTE: NO EMISSIONS -CONTAINED
[3]tpy	1.16	0.12	1.16	

Controlled

	PM10	PM2.5	TSP
Emission Factors	0.05	0.005	0.05
	lb/tons	lb/tons	lb/tons
Lb/hr	0.26	0.03	0.26
tpy	0.82	0.08	0.82

assume TSP = PM10; no TSP amount available from Title V Three River Timber, inc. permit

[1] See attached "Title V Three River Timber, Inc. permit" for PM10 emission factor

[2] Lb/hr = lb/tons of log x tons of log/hr

[3] tpy = lb/hr x hr/yr ÷ 2000

[4] Emission factor is based on assumption that 10% of PM10 is PM2.5
according to attached WHO's publication on "Wood Dust and Formaldehyde"
The WHO atricle considers PM2.5 emissions to be insignificant and we have assume it to be 10% of PM10 simil

Debarker

Premier Shaving and Pellet Facility

Manufacturer: To be determine

Max Capacity: 90 tpd (maximum 1 logs/10 sec x 60 sec/min x 60 min/hr)

5.3 tph (90 tpd ÷ 17 hr/day = 5.3 tph)

Operations: 17 hr/day

7 day/week

52 week/yr

6188 hr/yr

THIS SOURCE IS CURRENTLY NOT PART OF PLANT CONFIGURATION

Uncontrolled

	PM10	[5]PM2.5	TSP	
[1]Emission Factors	0.011	0.0011		
	lb/tons	lb/tons		
[2]Lb/hr	0.06	0.01	0.06	NOTE: NO EMISSIONS -CONTAINED
[3]tpy	0.25	0.03	0.25	

Controlled

	PM10	PM2.5	TSP
Emission Factors	0.011	0.0011	0.011
	lb/tons	lb/tons	lb/tons
Lb/hr	0.06	0.01	0.06
tpy	0.18	0.02	0.18

[1] See attached "Title V Three River Timber, Inc. permit" for PM10 emission factor

[2] Lb/hr = lb/tons of log x tons of log/hr

[3] tpy = lb/hr x hr/yr ÷ 2000

[5] Emission factor is based on assumption that 10% of PM10 is PM2.5 according to attached WHO's publication on "Wood Dust and Formaldehyde"

Log Cutter - Unit 5

Premier Shaving and Pellet Facility

Manufacturer:	Not Available		7.56	Feed Rate for Logs
Max Capacity:	7.56	logs/hr	1400	lbs/log
	5.3	tons/hr	10584	lbs/hr of logs
Avg Log Weight:	1400	lb/log	5.29	Ton/hr
Operations:	17	hr/day		
	7	day/week		
	52	week/yr		
	6188	hr/yr		

	Uncontrolled			
	PM10	**[5]PM2.5**	**TSP**	
[1]Emission Factors	0.08	0.008		
	lb/tons	lb/tons		
[2]Lb/hr	0.42	0.04	0.42	NOTE: NO EMISSIONS -CONTAINED
[3]tpy	1.85	0.18	1.85	

	[4]Controlled		
	PM10	**PM2.5**	**TSP**
Emission Factors	0.08	0.008	
	lb/tons	lb/tons	
Lb/hr	0.43	0.04	0.43
tpy	1.34	0.13	1.34

[1] See attached "Title V Three River Timber, Inc. permit" for PM10 emission factor

[2] Lb/hr = lb/tons of log x tons of log/hr

[3] tpy = lb/hr x hr/yr ÷ 2000

[4] Controlled are limited by the plant's physical maximum capacity of 90 tpd or 5.4 tph for

[5] Emission factor is based on assumption that 10% of PM10 is PM2.5
according to attached WHO's publication on "Wood Dust and Formaldehyde"

Wood Shaver - Unit 8

Premier Shaving and Pellet Facility

Manufacturer: Not Available
Max Capacity: 90 tpd
uncontrolled limit 5.3 tph
Operations: 17 hr/day
7 day/week
52 week/yr
6188 hr/yr

	Uncontrolled		
	PM10	**[5]PM2.5**	**TSP**
[1]Emission Factors	0.024	0.0024	0.024
	lb/tons	lb/tons	lb/tons
[2]Lb/hr	0.13	0.01	0.13
[3]tpy	0.55	0.06	0.55

requested Rate 5.3

NOTE: NO EMISSIONS -CONTAINED

	[4]Controlled		
	PM10	**PM2.5**	**TSP**
Emission Factors	0.024	0.0024	0.024
	lb/tons	lb/tons	lb/tons
Lb/hr	0.13	0.01	0.13
tpy	0.39	0.04	0.39

[1] See attached e-mail from Martha Allman from the Kentucky Department of Air Quality
[2] Lb/hr = lb/tons of log x tons of log/hr
[3] tpy = lb/hr x hr/yr ÷ 2000
[4] Controlled are limited by the plant's maximum capacity of 90 tpd or 5.3tph
[5] Emission factor is based on assumption that 10% of PM10 is PM2.5
according to attached WHO's publication on "Wood Dust and Formaldehyde"
This is based on the WHO article statement that there is insignificant emissions of respirable particluate matter

Assuming that 10% PM10 is extremely conservative; Shaving size is large about 2 inches wide and 1/16 inch thi
material for horses and it is imperative that horses do not inhale particles. Further the wood has 30-50% mois
there is no PM2.5.