

Part 70 Operating Permit Amendment

Permit Amendment No.: **2421-115-0016-V-01-3** Effective Date:

Facility Name: **Temple-Inland – Rome Lumber Mill**
380 Mays Bridge Road
Rome, Georgia 30162 Floyd County

Mailing Address: P.O. Box N
Diboll, TX 75941

Parent/Holding Company: TIN, Inc.

Facility AIRS Number: 04-13-115-00016

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:

An increase in the production capacity of Lumber Drying Kilns LDK1, LDK2, and LDK3 to 180 MMBF/yr.

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 Permit Amendment and Permit No. 2421-115-0016-V-01-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit 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 Application No. 16496 dated November 22, 2005; any other applications upon which this Permit Amendment or Permit No. 2421-115-0016-V-01-0 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 Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2421-115-0016-V-01-0.

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The Rome Lumber has proposed an increase in the allowable kiln production rate from the current limit of 151.25 MMBF per year to a total of 180 MMBF per year. On November 2, 2004 Permit Amendment No. 2421-115-0016-V-01-1 was issued to the facility to authorize an increase in the crib height of each kiln, thus allowing the total number of courses to increase from 66 to 69 in each kiln. Because this allowed an increase in production capacity, and therefore in potential emissions of air pollutants, the production rate was capped at 151.25 MMBF per twelve months. Rome Lumber is now proposing to increase the production capacity of the kilns again through the optimization of kiln scheduling and other changes that will result in fewer by-products per board foot of lumber produced. Because of the magnitude of the proposed increase in air emissions and the relaxation of the PSD-avoidance cap, the project is subject to New Source Review for air quality impacts. Specifically, Best Available Control Technology (BACT) and air quality analyses are required under the Prevention of Significant Deterioration (PSD) permitting program as administered by the Georgia Environmental Protection Division (“the Division” or “EPD”) and Georgia’s Rules for Air Quality Control. In accordance with 40 CFR Part 70 regulations, a significant modification to the Title V permit must be issued for the proposed changes.

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.

3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The Permittee shall not dry more than 180 million board feet of lumber during any twelve consecutive months in all three lumber drying kilns (ID Nos. LDK1, LDK2, LDK3) operated at the facility.
[391-3-1-.03(2)(c) and 40 CFR 52.21]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**

5.2.5 Within 90 days of the issuance of this permit, the Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for the lumber drying kilns (LDK1, LDK2, and LDK03) to assure that the provisions of Condition 8.17.1 are met. The program shall be subject to review and modification by the Division. At a minimum, the following operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in a maintenance log:
[391-3-1-.02(6)(b)1, 40 CFR 52.21, and 40 CFR 70.6(a)(3)(i)]

- a. General Work Practice Standards for Wood-Drying Kiln Operation:
 - i. The lumber kiln drying operation target final moisture content will be 12% or greater.
 - ii. The lumber kiln shall be operated following a wet bulb temperature set-point-drying schedule of 240°F or lower.
 - iii. Routines for periodic preventative maintenance are detailed in paragraphs b, c, d, e, and f of this condition, and are based on manufacturer's recommendations.
- b. Daily Routine:
 - i. Inspect wet bulb socks and replace as needed. Replace a sock daily if it has a tendency to become hard. Check water flow to the wet bulb.
 - ii. Check all baffles for damage, and report problems in writing to the Maintenance Department.
 - iii. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - iv. Check to verify that the heating system is operating properly.
- c. Six Week Routine:
 - i. Grease fan motors and bearings, inspect fans for damage. Check fan clearances and rotation. Tension and replace belts if required.
 - ii. Lubricate kiln trucks and inspect tracks for damage.
 - iii. Inspect kiln walls and doors for deterioration and schedule repairs as needed.
 - iv. Inspect temperature sensor mounts for damage. Ensure that all temperature monitors are pointed toward the lumber and in the air flow.

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- v. Inspect vents and linkages. Schedule repairs as needed.
 - vi. Grease vent shafts on vents in internal linkages.
 - vii. Sweep out kiln to remove accumulated dust.
- d. Semi-annual Routine:
- i. Verify accuracy of the temperature measurement systems. Repair or replace components as necessary.
 - ii. Inspect steam supply main and headers for steam leaks and insulation deficiencies. Repair as needed. Inspect steam traps for proper operation and replace/repair as needed. Stroke all steam valves.
- e. 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. The Permittee shall also record any exceedances of the work practice standards and preventive maintenance program and corrective action taken to prevent any future exceedances. The record must include the following:
- i. Any time a wet bulb temperature set-point-drying scheduled more than 240°F.
 - ii. Any time a final moisture content drying operation targeted less than 12%.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

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 12-consecutive month total of lumber dried in the kilns that is equal to or greater than 180 million board feet.

- 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 adverse condition discovered by the weekly inspections of the cyclone (ID No. PMC) required by Condition No. 5.2.2.
- ii. Any visible emissions from the baghouse (ID No. PMBH), which occurs for two consecutive determinations, done to comply with Condition No. 5.2.3.
- iii. Any failure to follow the procedure of the work practice and preventive maintenance plan required in Condition No. 5.2.5.
- iv. Any adverse condition(s) discovered and corrective action taken during the procedure to follow the work practice and preventive maintenance plan required in Condition No. 5.2.5.

6.2 Specific Record Keeping and Reporting Requirements

6.2.5 The Permittee shall notify the Division in writing if the drying kiln production exceeds 15,000,000 board feet 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 production limit in Condition No. 3.2.1. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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6.2.8 The Permittee shall maintain a kiln operation and maintenance log book for the following records in a permanent form. These records shall be retained for at least five years following the date of entry. The records shall be available for inspection or submittal to the Division upon request.

[40 CFR 52.21 and 391-3-1-.03(2)(c)]

- a. Reports shall be manually kept for each batch (or charge) processed and shall contain as a minimum the date, charge quantity, actual drying time, maximum wet-bulb actual and set-point temperature, dry-bulb actual and set-point temperature over the lumber drying time range, and the final target moisture content.
- b. For each visual inspection, the logbook shall contain the date, the initials of the personnel conducting the inspection, results of the visual inspection, documentation of any maintenance performed and any calibration performed on the kiln operation control equipment.