

Part 70 Operating Permit Amendment

Permit Amendment No.: **2421-245-0047-V-01-3** Effective Date: **April 27, 2006**

Facility Name: **International Paper Company, Inc.-Augusta Lumber Mill**

Facility Address 4206 Mike Padgett Highway
Augusta, Georgia 30906 Richmond County

Mailing Address: P. O. Box 1437
Augusta, Georgia 30903

Parent/Holding Company: International Paper Company, Inc.

Facility AIRS Number: 04-13-245-00047

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 an amendment to the Part 70 Operating Permit for:

The modification of the infeed of the sharp chain (sawmill) by installing a mini double length infeed; the modification of the three kilns to improve drying efficiency, which will increase the production capacity of the plant to 157 MMBF/yr; and the removal of the production restrictions on Kilns No. 2 and 3.

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. 2421-245-0047-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. 15723 dated October 22, 2004; any other applications upon which this Permit Amendment or Permit No. 2421-245-0047-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. 2421-245-0047-V-01-0.

Director
Environmental Protection Division

Title V Permit Amendment

Table of Contents

PART 1.0 FACILITY DESCRIPTION 1
1.3 Process Description of Modification 1

PART 3.0 REQUIREMENTS FOR EMISSION UNITS 2
3.1.1 Emission Units After Modification..... 2
3.2 Equipment Emission Caps and Operating Limits..... 2

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection) 3
5.2 Specific Monitoring Requirements 3

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS 5
6.1 General Record Keeping and Reporting Requirements 5
6.2 Specific Record Keeping and Reporting Requirements 6

Title V Permit Amendment

PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

International Paper Company, Inc.-Augusta Lumber Mill operates a lumber mill located in Augusta, Georgia. The Augusta Lumber Mill is proposing an expansion project in which lumber production capacity would be increased. The facility has requested to remove PSD avoidance production restrictions on two kilns (Emission Unit ID Nos. KD02 and KD03), which now are subject to a total kiln dried lumber PSD avoidance limit of 131.5 million board feet per any twelve consecutive months; to obtain authorization to make changes to each of the three kilns (Emission Unit ID Nos. KD01, KD02, and KD03) to improve drying efficiency; and to obtain authorization to modify the infeed of the sharp chain in the sawmill area by installing a mini double length infeed. Because an existing PSD avoidance limit is being relaxed and because of the magnitude of the proposed increase in air emissions, 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.

Title V Permit Amendment

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.

3.1.1 Emission Units After Modification

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
KD01	Direct-Fired Lumber Drying Kiln 1	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) 40 CFR 52.21 PSD	3.2.2, 3.4.1, 3.4.2, 5.3.1, 6.1.7, 6.2.2, 6.2.4, 6.2.5	None	None
KD02	Direct-Fired Lumber Drying Kiln 2	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) 40 CFR 52.21 PSD	3.2.2, 3.4.1, 3.4.2, 5.3.1, 6.1.7, 6.2.2, 6.2.4, 6.2.5	None	None
KD03	Direct-Fired Lumber Drying Kiln 3	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) 40 CFR 52.21 PSD	3.2.2, 3.4.1, 3.4.2, 5.3.1, 6.1.7, 6.2.2, 6.2.4, 6.2.5	None	None
PL01	Planer Mill	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.4.1, 3.4.3, 5.2.1, 5.3.1, 6.1.7c.i	CL02	Cyclone
RF01	Unpaved Roads	GA Rule 391-3-1-.02(2)(n)	3.4.4, 6.2.1	None	None
RF02	Paved Roads	GA Rule 391-3-1-.02(2)(n)	3.4.4, 6.2.1	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

3.2 Equipment Emission Caps and Operating Limits

3.2.1 [Revoked]

Modified Condition

3.2.2 The Permittee shall not dry in excess of 157.0 million board feet of lumber per any twelve consecutive months in the drying kilns (KD01, KD02, and KD03). The VOC emissions from each lumber drying kiln, as and when required, shall be estimated by using an emission factor of 4.6 lbs VOC/1,000 board feet lumber dried.

[391-3-1-.03(2)(c)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

New Conditions

5.2.3 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 (KD01, KD02, and KD03) 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 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 220°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. Routine Before or During each Kiln Charge:
 - 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. Ensure that all Resistance Temperature Detectors (RTDs) are in the airflow.
 - iii. Check all baffles for damage, record problems and repairs done.
 - iv. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - v. Ensure that the kiln computer controller is functioning properly.
 - vi. Check to verify that the heating system is operating properly.
- c. Weekly Routine:
 - i. Replace wet bulb socks (unless done so on a daily basis).
 - ii. Drain oil or water from transducer air supplies.
 - iii. Clean tracks through kilns, to remove accumulated dust.

Title V Permit Amendment

- iv. Ensure all amp-meters are operational.
- d. Monthly Routine:
 - i. Grease lumber truck wheels.
 - ii. Check bearing bolts on fans.
 - iii. Check motor/fan drive belts. Grease fan motors and bearings, and inspect fans for damage. Check fan clearance and rotation. Adjust tension and replace belts if required.
 - iv. Inspect kiln walls and doors for deterioration; schedule repairs if necessary.
 - v. Inspect temperature sensor mounts for damage.
 - vi. Ensure control room's air conditioner/heater is working properly for maintaining correct temperature for electrical components.
 - vii. Inspect air-venting motors for proper attachment to the mounting bases; ensure that arms are functioning properly.
- e. Semi-Annually:
 - i. Check connection on all RTDs.
- f. Annually:
 - i. Check tracks for damage.
 - ii. Inspect area at base of kiln door for damage.
- g. The Permittee shall correct any adverse condition, discovered by an inspection done in accordance with this condition, in the most expedient manner possible 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 220°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

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 twelve consecutive months during which more than 157 million board feet of lumber are dried in the three lumber drying kilns (KD01, KD02, and KD03).

- ii. Any exceedance of the work practice standards. As part of the reporting, the Permittee shall report corrective action taken as required in Condition 5.2.3.

- 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 two consecutive days that problems are revealed by the inspection required in Condition 5.2.1.

- ii. Any failure to follow any procedure of the work practice and preventive maintenance plan required in Condition 5.2.3.

- iii. Any adverse condition(s) found for two consecutive days, and corrective action taken while following the work practice and preventive maintenance plan required in Condition 5.2.3.

6.2 Specific Record Keeping and Reporting Requirements

Modified Conditions

- 6.2.2 The Permittee shall maintain records of the monthly production rates of the processed dried lumber necessary to confirm compliance with the production limits in Condition No. 3.2.2. The records shall be recorded in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the date of entry.
[40 CFR 52.21 and 391-3-1-.03(2)(c)]

- 6.2.3 [Revoked]

- 6.2.4 The Permittee shall notify the Division in writing if the total production of drying kilns KD01, KD02, and KD03 exceeds 13,083,333 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 of Condition No. 3.2.2.
[40 CFR 52.21 and 391-3-1-.03(2)(c)]

- 6.2.5 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 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 temperatures, dry-bulb actual and set-point temperatures over the lumber drying time range, and the final target moisture content. Records may be kept in either paper or electronic formats.

 - b. For each visual inspection, the logbook shall contain the date, the initials of the person conducting the inspection, the results of the visual inspection, documentation of any maintenance performed and any calibration performed on the kiln operation equipment.