

Prevention of Significant Air Quality Deterioration Review

Final Determination

October 2015

Facility Name: Georgia-Pacific Wood Products South LLC – Lumber Plant

City: Rome

County: Floyd

AIRS Number: 04-13-115-00016

Application Number: 40038

Date Application Received: March 6, 2015



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch

Karen Hays – Chief, Air Protection Branch

Stationary Source Permitting Program

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BACKGROUND

On March 6, 2015, Georgia-Pacific Wood Products South LLC – Lumber Plant (hereafter Georgia-Pacific) submitted an application for an air quality permit to construct and operate a 125 MMBF/yr continuous direct-fired lumber kiln with a sawdust gasifier, fuel silo and associated equipment and the replacement of the stacker. The facility is located at 380 Mays Bridge Road in Rome, Floyd County. The proposed project will increase the production limit from 220 to 345 MMBF/yr. The proposed project will result in an increase in emissions from the facility. The sources of these increases in emissions include the continuous direct-fired lumber kiln, sawdust gasifier, fuel silo, associated equipment and ancillary equipment including log sawing and debarking, material handling/transfer sources, chipper and hogger, and haul roads. Increases in emissions from ancillary equipment are a result of the increased facility production limit.

On August 19, 2015, the Division issued a Preliminary Determination stating that the modifications described in Application No. 40038 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that Georgia-Pacific place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in *Rome News-Tribune* (legal organ for Floyd County) on September 10, 2015. The public comment period expired on October 12, 2015.

During the comment period, comments were received from the facility. There were no comments received from the U.S. EPA Region IV or the general public.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

GEORGIA-PACIFIC COMMENTS

Comments were received from Joe Gorski, Lumber Division Environmental Manager, by letter on October 9, 2015.

Comment 1

Condition 3.2.5. This condition lists a compliance limit of 6,000 hours of operation for the planer mill cyclone. The limit is based on the projected actual hours of future usage of the planer mill provided in the application. There are no requirements in the Georgia EPD or federal Prevention of Significant Deterioration (PSD) rules for a compliance limit based on a projected actual value represented in an application. The requirement, as incorporated by Georgia Rule 391-3-1-.03(7)(b)15 is...

As the project does not increase the capacity of the planer mill, the facility must calculate and maintain records of the annual emissions, in tons-per-year on a calendar year basis, for a period of five years following resumption of regular operations. As there are no other emissions units in the PSD analysis, an exceedance of 6,000 hours of planer operation would not automatically result in triggering PSD.

GP understands that this condition was put in for simplicity of tracking but has concerns about reporting it as a violation, when no standard would be exceeded. GP does agree that tracking hours only is simpler and proposed the following modifications.

EPD Response.

The EPD agrees with Comment 1 and has modified Condition 3.2.5 to the following:

If the Planer Mill (ID No. PM) exceeds 6,000 hours of operation during any twelve consecutive months, the Permittee shall calculate the twelve month rolling total emissions increase for the kiln project and compare to the PSD permitting thresholds. The project increases shall not exceed the respective significant emissions rates (SER) for each pollutant. This limit shall apply for five years after the startup of the Lumber Drying Kiln (ID No. CDK).

The EPD agrees with Comment 1 and has modified Condition 6.1.7.b.iii to the following:

Any 12-consecutive month total of operational hours for the Planer Mill (ID No. PM) that is greater than 6,000 hours and calculated emission increases for the kiln project that show an exceedance for SER for any pollutant. This exceedance shall apply for five years after the startup of the Lumber Drying Kiln (ID No. CDK).

Comment 2

Condition 6.2.6.b.i. This condition requires daily inspection of wet bulb socks. Based on recent mill experience, daily inspection presents a safety hazard. The kilns are only brought out of service every four to six weeks. When the kilns are not brought of service, they remain very hot and are not safe to enter. Therefore, GP requests that this condition be moved to the 6-week category.

EPD Response.

The EPD agrees with Comment 2 and has moved this requirement to Condition 3.2.6c.viii as part of the six week routine.

Comment 3

Condition 6.2.11. This condition monthly reporting of hours of planer operation that exceed 500 hours per month. Request that this condition be removed for the same reasons expressed in Comment 1, above. Alternatively, GP requests that this condition be changed to quarterly hours of operation that exceed 1,500 hours per quarter to allow for month to month operational flexibility.

EPD Response.

The EPD agrees with Comment 3 and has removed this condition from the permit. The twelve consecutive month limit of 6,000 hours of operation for the Planer Mill will remain and will be renumbered to Condition 6.2.11.

EPD CHANGES

There were no additional changes made to the permit.

APPENDIX A

AIR QUALITY PERMIT

2421-115-0016-V-04-1

APPENDIX B

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD