

Facility Name: **Telfair Forest Products, LLC**
 City: Lumber City
 County: Telfair
 AIRS #: 04-13-271-00022

Application #: TV-22912
 Date Application Received: October 23, 2014
 Date Application Deemed Administratively Complete: December 23, 2014
 Date of Draft Permit: February 18, 2015
 Permit No: 2499-271-0022-V-04-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Telfair Forest Products, LLC and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:Telfair Forest Products

2. Parent/Holding Company Name

Telfair Forest Products

3. Previous and/or Other Name(s)

The facility has not been known by any other name.

4. Facility Location

11 West Industrial Blvd., Lumber City, GA 31549

5. Attainment or Non-attainment Area Location

The facility is located in an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control. Telfair Forest Products started operating at a closed lumber mill belonging to Rayonier which had an AIRS No. 271-00004. Telfair Forest Products has operated always under the AIRS No. 271-00022. This was done to differentiate the Rayonier site/operations from Telfair's site/operations.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below."

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2499-271-0022-E-03-0	October 21, 2103	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
2499-271-0022-E-03-0	Transitional Permit before Initial Title V Permit is issued to the facility

D. Process Description

1. SIC Codes(s)

2499 – Wood Products Not Elsewhere Classified

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility initially started a wood shavings operation which made wood shavings from southern yellow pine trees. Last year it added a wood pelleting operation to give it flexibility to either make wood shavings or wood pellets or a combination of shavings and pellets depending on market demands.

3. Overall Facility Process Description

Shavings Plant

The process begins with buying Southern Yellow Pine logs in tree length loads. Tree length loads of Southern Yellow Pine arrive by logging trucks at the facility and are off-loaded and processed through a cut up saw and cut into short log lengths. Logs are then transported via conveyor chains to one of the three shavers (SH1/SH2/SH3). Shavings from the shavers are belt conveyed to a vibrating shaker screen (VS1) where the gross overs are diverted to a chipper and back into the shavings loop. The acceptable shavings then flow from VS1 to a rotary drum dryer (DR1) receiving hot air from a 40 MMBTU/hour natural gas burner (BU3). The dried shavings pass through the dryer to a cyclone (CY1) with rotary air lock. The shavings travel through the air lock to a dry shavings conveyor to a vibrating shaker screen (VS2). Here accepts are transported via enclosed screw conveyor to storage hoppers which are above the bailing and bagging machine (BB1) and (BB2). The wood shavings are then baled, bagged and palletized. Palletized shaving bags are then wrapped and placed in a warehouse or loaded into the customer trucks.

At VS2, the fines are screened off and transported via pneumatic conveyor to the pellet plant to be used as pellet furnish.

Pellet Manufacturing Plant

The dried shavings from VS2, in the existing Shavings Plant, are diverted (all, a portion of, or none at all) and are air conveyed, as the shavings market dictates to the wood pelleting receiving area.

Additionally, the pellet furnish is augmented by purchasing dry (10%-12% moisture) pine shavings from local area sawmills. Purchased dry shavings will be off-loaded via live bottom trailers into an enclosed facility designed for handling dry shavings. These shavings are loaded into one of two hoppers (HP1 & HP2) [under roof] via front end loaders. Shavings are then transported via chain and belt conveyors to shaker screen (VS3) under same roof to screen off any gross overs. The accepts from VS3 convey by belt (enclosed) to an elevated storage bin (EB1) (Drop from belt to storage is enclosed.)

Shavings are conveyed from EB1 via enclosed chain conveyors to an enclosed drop to one of two Hammer mills (HM1 & HM2). The pellet furnish from the hammer mill is air conveyed to one of the two pellet mill furnish surge bins (SB1 & SB2) with cyclones with rotary air locks. Air out of these two cyclones (CY2, CY3) passes through baghouse (BH1) and is sent to burner BU3 for destruction of VOC and HAPs. Each surge bin furnishes via augers two 5 ton/hr pellet machines. (PM1, PM2, PM3 and PM4) The pellet mill can thus produce pellets at the rate of 20 ton/hr.

From each pellet machine, pellets are air conveyed to a pellet cooler (CO1) with four cyclones (one for each pellet machine) (CY4, CY5, CY6 and CY7). Pellets are cooled and dropped to an enclosed vibrating screener (VS4). Acceptable pellets are dropped from screener to a belt conveyor which transports pellets to warehouse storage or to rail/truck loading. Reject material from screener is dropped through a rotary air lock to air convey system to return to storage bin (EB1) through bag house filter (BH2) for recycle back through pellet machines. The cooler has a Dual Cyclone (CY8) and fan to remove fines and they are conveyed through rotary air locks to the same system conveying the above screener rejects back to storage (EB1) through bag house (BH1). The Cooler cyclones with rotary air locks also drops materials back to the same system that conveys the screener rejects back to storage (EB1).

The Bag house (BH1) air lock also drop any accumulated product to the screener fines convey system. The screener rejects are conveyed to storage through baghouse (BH2) for recycle to the Pellet machines.

Pellet Furnish Dryer

The addition of a wood biomass burner (BU2) with a 70 foot four-zone dryer (DR2) with dual cyclone collectors (CY9) and recycle system for the exhaust stack was permitted in October 2013 to create more drying capacity while installing an improved burner (BU2)/dryer (DR2) system to utilize wood biomass produced at the facility. The furnish dryer (DR2) is supplied with (wet) pine sawdust and chips bought from area sawmills. The green (wet) material being brought into the plant is dried to a 10% moisture for pellet factory furnish.

The pellet furnish dryer (DR2) has a wet hammermill for reducing the size of the green wood chips upstream of the rotary dryer. Downstream of the dryer there is a cyclone to separate the pellet furnish from the exhaust air stream from the dryer which is partly recycled back to the burner BU2 and partly discharged through a stack. The Permittee informed EPD that at least 50% of the dryer exhaust air stream will be recycled back to the pellet furnish burner (BU2) for destruction of VOC and HAPs. Some CO emissions will also be converted to CO₂ in the burner BU2. The solids from the cyclone then go to a vibratory screener (VS5) where fines are separated from the pellet furnish that goes to the dry pellet furnish storage bins in the existing pellet mill. The fines from the vibratory screen goes to a fuel surge bin before going to a hammermill (HM3) and a cyclone (CY10) before being stored in the fuel storage bin for the burner BU2.

4. Overall Process Flow Diagram (optional)

The Initial Title V Permit application contained a process flow diagram. Please refer to this diagram if needed.

E. Regulatory Status

1. PSD/NSR

The facility has a PSD avoidance limit of 249 tons per year for PM, CO, NO_x and VOC:

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
CO	✓	✓		
TRS	N/A	-		
H ₂ S	N/A	-		
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The facility is a minor source of HAPs and no MACT standards apply to it.

4. Program Applicability

Indicate if the following programs are applicable to the facility (with a "yes" or "no").

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M – Part 63 NESHAP	no
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Condition 2.1.1 limits facilitywide PM, CO, NO_x and VOC emissions to 249 tons per year for PSD avoidance purposes.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – PSD regulations do not apply since the facility is a PSD minor source and has taken PSD avoidance limits for carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM) and volatile organic compound (VOC) emissions in order to be not subject to the PSD rules.

Emission and Operating Standards – Not applicable.

C. Compliance Status

The facility appears to operate in compliance with applicable rules and regulations.

D. Operational Flexibility

None requested in the permit application..

E. Permit Conditions

Condition 2.1.1 limits facilitywide PM, CO, NOx and VOC emissions to 249 tons per year for PSD avoidance purposes.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility has a wood shaving manufacturing operation and a wood pellet manufacturing operation. The shavings and pellet production operation are described in Section D. 3. of this narrative.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
BU3	Natural gas fired burner for rotary shavings dryer DR1	391-3-1-.02(b) 391-3-1-.02(e) 391-3-1-.02(g) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.4.6, 4.2.5, 5.1.4, 5.2.7, 5.2.9, 5.2.11, 5.2.12, 5.2.13, 6.1.7b, 6.1.7c., 6.2.3, 6.2.4	CY1	Cyclone
BU2	Direct Wood-fired horizontal dry suspension burners	391-3-1-.02(b) 391-3-1-.02(e) 391-3-1-.02(g) 391-3-1-.02(n) PSD avoidance	2.1.1, 2.1.1, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.4.6, 4.2.5, 5.1.4, 5.2.7, 5.2.9, 5.2.11, 5.2.12, 5.2.13, 6.1.7b, 6.1.7c., 6.2.3, 6.2.4	CY9	Cyclone
SHGP	Log Shavers (SH1/SH2/SH3)	391-3-1-.02(b) 391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6	N/A	N/A
DR1	Shavings Dryer directly heated by burner BU3	391-3-1-.02(b) 391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.2.1, 3.4.1, 3.4.2, 3.4.5, 3.4.6, 4.2.1, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.8, 5.2.9, 5.2.11, 5.2.12, 5.2.13, 6.1.7b, 6.1.7c., 6.2.1, 6.2.3, 6.2.4, 6.2.5, 6.2.7, 6.2.7	CY1	High Efficiency Cyclone
VS1	Shaker/Vibratory Screen	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6	N/A	N/A
VS2	Shaker/Vibratory Screen	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.2.5, 5.2.6, 6.1.7.c.	N/A	N/A
VS3	Vibratory Screener	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.2.5, 5.2.6, 6.1.7.c.	N/A	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
HM1*	Hammer Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.1.4, 5.2.1, 5.2.5, 5.2.6, 6.1.7.c., 6.2.4	CY1 BH1 BU3	Cyclone Baghouse Shavings Plant Burner
HM2*	Hammer Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.1.4, 5.2.1, 5.2.5, 5.2.6, 6.1.7.c., 6.2.4	CY1 BH1 BU3	Cyclone Baghouse Shavings Plant Burner
SB1 SB2	Pellet Mill Furnish Surge Bins	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.1, 3.4.5, 3.4.6	N/A	N/A
PM1*	Pellet Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6, 5.1.4, 5.2.1, 6.1.7.c., 6.2.4	CY4 BU3	High Efficiency Cyclone Shavings Plant Burner
PM2*	Pellet Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6, 5.1.4, 5.2.1, 6.1.7.c., 6.2.4	CY5 BU3	HE Cyclone Shavings Plant Burner
PM3	Pellet Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6, 5.1.4, 5.2.1, 6.1.7.c., 6.2.4	CY6 BU3	HE Cyclone Shavings Plant Burner
PM4	Pellet Mill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6, 5.1.4, 5.2.1, 6.1.7.c., 6.2.4	CY7 BU3	HE Cyclone Shavings Plant Burner
CO1	Pellet Cooler	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.5, 3.4.6, 5.2.1, 6.1.7.c., 6.2.4	CY8 BU3	HE Cyclone Shavings Plant Burner
VS4	Vibratory Screener (enclosed)	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.2.5, 5.2.6, 6.1.7.c.	BH2	Baghouse
HM3	Hammermill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.1.4, 5.2.1, 5.2.5, 5.2.6, 6.1.7.c., 6.2.4	CY9	Cyclone
WHM1	Wet wood Hammermill	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.1.4, 5.2.1, 5.2.5, 5.2.6, 6.1.7.c., 6.2.4	N/A	N/A
DR2	Dryer directly heated by burner BU2	391-3-1-.02(b) 391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.2.1, 3.4.1, 3.4.2, 3.4.5, 3.4.6, 4.2.1, 4.2.3, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.8, 5.2.9, 5.2.11, 5.2.12, 5.2.13, 6.1.7b, 6.1.7c., 6.2.1, 6.2.3, 6.2.4, 6.2.5, 6.2.7, 6.2.7	CY9 BU2	Cyclone Pellet Furnish Burner
VS5	Vibratory Screen	391-3-1-.02(e) 391-3-1-.02(n) PSD avoidance	2.1.1, 3.4.4, 3.4.5, 3.4.6, 5.1.3, 5.2.5, 5.2.6, 6.1.7.c.	N/A	N/A

Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

* Exhaust from the Hammermills HM1, HM2 and Pellet Mills PM1 and PM2 sent to the shavings plant burner BU3 for VOC and HAPs control

C. Equipment & Rule Applicability

Emission and Operating Caps –

For PSD avoidance purposes the shavings dryer (source code: DR1) is capped at 29,700 tons per year. The Pellet mill dryer (source code: DR2) is also capped at 67,500 tons per year

Applicable Rules and Regulations -

Rules and Regulations Assessment: Georgia Rule (e) limits PM emissions from the burner and dryer. Georgia Rule (b) limits opacity of visible emissions from the burner/dryer stack. Georgia Rule (g) limits the sulfur content of wood residues burnt in the burner. The sulfur content of wood is very low and will easily comply with the 2.5% by weight limit of this rule. Georgia Rule (e) limits PM emissions from all process equipment such as shavings dryer, pellet furnish dryer, hammermills, pelletmills and pellet coolers at the facility. Georgia Rule (n) governs fugitive emissions from wood shaving and pelleting operations. Opacity from fugitive emissions is limited to 20% by Georgia Rule (n).

D. Compliance Status

The Permittee does not appear to have installed an oxygen monitoring system for monitoring the oxygen level at the burner exhaust. They have proposed an alternate temperature monitoring regime instead of the oxygen monitoring system in the permit. EPD has requested the Permittee to conduct performance tests for VOC, CO, PM, Opacity and NOx and demonstrate that these emission of these pollutants can be minimized via temperature monitoring in a Consent Order No. EPD-AQC-6747 dated September 24, 2014.

E. Operational Flexibility

Not applicable.

F. Permit Conditions

Condition 3.2.1 limits the amount of wood dried in the shavings plant dryer (source code: DR1) and the pellet mill dryer (source code: DR2) for PSD avoidance purpose.

Condition 3.4.1 limits PM emission from the shavings dryer (source code: DR1) and the pellet mill dryer (source code: DR2) stacks per Georgia Rule (e).

Condition 3.4.2 limits opacity of visible emissions from the dryer stacks (DR1 and DR2) to 40% per Georgia Rule (b). The burners are not fuel burning equipment since they don't generate steam and direct heat indirectly to the dryers.

Condition 3.4.3 limits the sulfur content of the wood residues fired in the burners (Source Code: BU2 and BU3) to 2.5% by weight per Georgia Rule (g).

Condition 3.4.4 limits the PM emissions from the hammermills, pelletmills, pellet cooler and vibratory screens per Georgia Rule (e).

Condition 3.4.5 and 3.4.6 pertains to fugitive emissions from the shavings and pellet manufacturing operations. Fugitive emissions are limited to 20% per Georgia Rule (n).

Condition 3.4.7 requires the hammermills (HM1 and HM2) and Pellet Mills (PM1 and PM2) to exhaust into the burner BU3 air supply for effective control of VOC, HAPs and CO.

Condition 3.4.8 requires recycling of at least 50% of the exhaust from the pellet furnish dryer to the pellet furnish burner BU2 for control of VOC, HAPs and CO.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The standard general requirements are included in the permit.

B. Specific Testing Requirements

Condition 4.2.1 requires establishment of emission factors for PM, NO_x and CO from the most recent performance tests for use in calculating monthly emissions of PM, NO_x and CO.

Condition 4.2.2 requires periodic tests of NO_x and CO emissions from the pellet furnish dryer every two years.

Condition 4.2.3 requires establishment of emission factor for VOC emissions from the shavings plant dryer stack and the pellet plant dryer stack from the initial or the most recent performance test and use this emission factor to calculate monthly VOC emissions from the shavings plant and the pellet plant.

Condition 4.2.4 requires VOC periodic performance tests on the pellet furnish dryer stacks once every four years.

Condition 4.2.5 prohibits use of any monitoring or test equipment during performance tests that are not used in normal daily operations of the dryers. This condition also requires the Permittee to submit pre-test and post-test data for up to two days before and after the source test date to be submitted to EPD along with the source test report.

On October 15 and 16 2014 the shavings dryer (DR1) and the pellet mill dryer (DR2) were tested simultaneously for NO_x, CO, VOC (Total Hydrocarbons), PM and Opacity. Test results indicate that the dryer emissions were in compliance with the PSD avoidance permit limits, Rule (b) opacity limit and Rule (e) allowable PM limit except for the shavings plant dryer (DR1) which did not comply with the Rule (e) allowable PM limit. The test results are summarized below:

Source ID	Pollutant	Tested Rate (lb/hr)	Lb/Ton green wood	Total Potential Emissions (tons)
Dryer 1 (DR1)	TPM (filterable & condensible)	34.3	1.82	27.0
Dryer 2 (DR2)	TPM (filterable & condensible)	38.1	1.09	36.8
Dryer 1 (DR1)	PM	29.8	18.5 (Rule (e) limit)	
Dryer 2 (DR2)	PM	25.8	27.9 (Rule (e) limit)	
Dryer 1 (DR1)	NOx	4.52	0.48	6.7
Dryer 2 (DR2)	NOx	6.43	0.37	12.5
Dryer 1 (DR1)	Visible Emissions	28.3%		
Dryer 2 (DR2)	Visible Emissions	33.3%		
Dryer 1 (DR1)	Total Hydrocarbons	28.9	3.06	45.4
Dryer 2 (DR2)	Total Hydrocarbons	38.9	2.22	74.9
Dryer 1 (DR1)	CO	3.61	0.38	5.6
Dryer 2 (DR2)	CO	46.6	1.33	44.9

The test results show that the facility is a Title V major source for VOC emissions. It is a PSD minor source for all PSD pollutants.

2. Equipment Groups (all subject to the same test requirements):

Not applicable.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

The standard general requirements are included in the permit.

Condition 5.1.2 requires routine maintenance to be performed on all process and pollution control equipment including all cyclones.

Condition 5.1.3 requires the Permittee to have an adequate supply of baghouse filter bags on hand to replace any leaking or bursted bags.

B. Specific Monitoring Requirements**1. Individual Equipment:**

Condition 5.2.1 requires operation and maintenance checks and weekly inspection of all cyclones at the facility.

Condition 5.2.2 requires the permittee to continuously monitor the pressure drop across the cyclones CY1 and CY9 receiving exhaust from the shavings dryer DR1 and the pellet furnish dryer DR2. This condition also requires the pressure drop to be recorded at least once for each of operation.

Condition 5.2.3 requires the Permittee to establish a normal operating range for the pressure drop across each process cyclone in the pellet furnish dryer plant from the data collected per Condition 5.2.2 or from future compliance test.

Condition 5.2.4 requires twice daily observation of the shaving dryer and the pellet furnish dryer exhaust stack opacities. This condition requires the permittee to take corrective action whenever the stack opacities exceed 30%.

Condition 5.2.5 requires monitoring of the pressure drop across the baghouses BH1 and BH2 that are installed downstream of the hammermills and the vibratory screener and record the pressure drop at least once each day.

Condition 5.2.6 requires the Permittee to develop and implement a Preventive Maintenance Program (PMP) for the two baghouses BH1 and BH2 specified in Condition 5.2.5.

Condition 5.2.7 requires Telfair to develop and implement a Work Practice and Preventative Maintenance Program for the Wood Flake Burner and the pellet furnish Rotary Dryer in order to optimize emissions of CO, VOC, HAPs and NO_x from the burners and dryers.

Condition 5.2.8 requires Telfair to install a pressure monitor in the recycle duct from the pellet plant dryer DR2 to the dryer burner BU2 to monitor the pressure drop in the recycle duct when 50% of the exhaust from dryer DR2 is recycled to the burner BU2.

Condition 5.2.9 states that the Shavings plant burner/dryer and the pellet furnish burner/dryer are subject to CAM (compliance assurance monitoring) for CO, PM and VOC.

Condition 5.2.10 establishes the CAM indicator parameters (visible emissions and pressure drop across cyclone) for PM (particulate matter) for the shavings plant and pellet plant burner/dryer system.

Condition 5.2.11 establishes the CAM indicator parameters (Burner temperature) for CO and VOC for the burner/dryer for the shavings plant and the pellet plant.

2. Equipment Groups (all subject to the same monitoring requirements):

None.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The standard general requirements are included in the permit.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7b requires reporting of the exceedance of the PSD avoidance limit for CO, VOC, PM and HAPs. It also requires reporting of the exceedance of the shaving plant and the pellet furnish dryer production limits and exceedance of the fuel sulfur content limits.

Condition 6.1.7.c. requires reporting of the excursion of pressure drop reading for the dryer cyclones and the pellet mill and the vibratory screener baghouses, opacity readings of the shavings and the pellet furnish dryer stacks exceed 30% for two or more consecutive days, failure to follow required work practice procedures in Condition 5.2.7, Any adverse condition discovered by the weekly inspections of the cyclones (CY1-CY10) per Condition 5.2.1, Any three-hour average pressure drop in the dryer DR2 recycle duct that is 15% outside the range established during the most recent source test while recycling 50% of the dryer exhaust.

Condition 6.2.1 requires maintenance of production records such as the total amount of product dried in each of the Dryers (DR1 and DR2) in oven dry tons (ODT), amount of material processed in the Hammermills, Pellet press and the Pellet Cooler in metric tons (short tons), on a monthly basis.

Condition 6.2.2 require Telfair to maintain records of the monthly input rates of the green wood processed for drying necessary to confirm compliance with the limits in Condition 3.2.1. The total green wood dried in the triple pass dryers (DR1 and DR2) for the previous 11 consecutive months must be included in each month's log.

Condition 6.2.3 requires Telfair to calculate emissions of NO_x, CO and PM/PM₁₀/PM_{2.5} emissions from the Burners (BU3 and BU2)/Drum dryers (DR1 and DR2), Hammermills (HM1-HM3 and WHM1), Pellet Mills (PM1-PM4) and Pellet coolers cyclones (CY4-CY8) each month using the production data and the emission factors for the above pollutants. The emission factors for NO_x, CO and PM can be established using the latest source test data. This condition requires the Permittee to notify EPD whenever monthly emissions of NO_x, CO and/or PM exceeds 20.7 tons in any month.

Condition 6.2.4 requires Telfair to calculate VOC emissions from the shavings plant and the pellet furnish dryers each month using the production data and the VOC emission factors for the dryers obtained from the latest source tests.

Condition 6.2.5 requires the Permittee to calculate the rolling total consecutive twelve month emissions of CO, NO_x and PM using the monthly emission data from Condition 6.2.3 for each month in the reporting period.

Condition 6.2.6 requires calculation of 12 month rolling total VOC emissions from the monthly VOC emission data calculated in Condition 6.2.4 for each month in the reporting period and reporting of any monthly VOC emissions in excess of 20.7 tons.

VII. Specific Requirements

Note: Be sure to discuss any stratospheric ozone protection requirements (see subsection J.) that may apply to the source.

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

None.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Not applicable.

E. Short-Term Activities

None indicated in the permit application.

F. Compliance Schedule/Progress Reports

There is no progress reports required by the consent order no. EPD-AQC-6747 dated September 23, 2014.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable to this facility.

I. Prevention of Accidental Releases

Not applicable.

J. Stratospheric Ozone Protection Requirements

The facility is not subject to Title VI requirements.

K. Pollution Prevention

Not applicable.

L. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.