Facility Name: **Langboard OSB, Quitman**
City: Quitman
County: Brooks
AIRS #: 04-13-02700013

Application #: TV-61491
Date Application Received: July 27, 2017
Permit No: 2493-027-0013-V-04-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The 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. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The 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: Langboard OSB

2. Parent/Holding: Langdale Industries

3. Previous and/or Other Name(s): Langboard, Inc.

4. Facility Location: Hwy 84 East, Quitman, GA 31650

5. Attainment, Non-attainment Area Location, or Contributing Area: Attainment

B. Site Determination

This permit covers the OSB plant constructed in 2005, the details of which are included in Title V permit application No. 15084. Note that the original old OSB plant, which was adjacent and under common control, ceased to operate after the startup of the exiting new plant.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2493-027-0013-V-03-0	January 29, 2013	Title V Renewal
2493-027-0013-V-03-1	December 29, 2016	Installation of new baghouse
2493-027-0013-V-03-2	July 29, 2016	Modification to PM emission limits

D. Process Description

1. SIC Codes(s)

2493 Reconstituted Wood Products

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 plant produces oriented strand board (OSB).

3. Overall Facility Process Description

Mixed pine and a limited amount of southern hardwoods are received by truck, debarked, flaked, conveyed to wet flake metering bins and dried. The facility includes two single-pass rotary flake dryers (Source ID Nos. P003 and P004), each with a maximum input rate of 75,000 pounds per hour (lb/hr). Heat for the dryers is provided by one of two wood fired furnaces (Source ID Nos. P001 and P002). The heat input capacity of each Energy System is 160 million British thermal units per hour (MMBtu/hr). The Energy Systems combust primarily wood bark, up to 33,230 lb/hr, and are controlled by an electrostatic precipitator (ESP) and NOx Abatement System. The Energy Systems receive exhaust gases from the dryers, board press (Source ID No. P008) and blenders (Source ID No. P006) for reduction of VOC emissions.

Once the flakes have reached the desired moisture content in the dryers, they are collected, screened for fines removal (Source ID No. P005) and conveyed to blender metering bins. Particulate Matter (PM) emissions from screening and handling are controlled by a bin vent (Source ID No. C002) and a baghouse (Source ID No. C004). The flakes are mixed with wax and phenol-formaldehyde resin in the blenders (Source ID No. P006). The flakes are then aligned and formed into a continuous mat (Source ID No. P007). The mat is cut into sections which are then pressed at high temperature and pressure in a board press (Source ID No. P008), at a rate of up to 150,000 lb/hr and heated by thermal oil. Finally, the boards are trimmed (Source ID No. P010), sanded (Source ID No. P009), graded, edge coated and packaged for shipment. Multiple baghouses control PM emissions from these operations. The maximum production rate is 500 million square feet per year (MMscf/yr) of OSB.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Langboard's potential to emit (with permit limits) each PSD regulated pollutant does not exceed the 250-ton per year PSD major source threshold for any pollutant. The facility is, therefore, not a major source for PSD/NSR regulations. This facility is not one of the 28 named source categories under PSD for which the PTE threshold is 100 tons per year. Also the facility is not located in a non-attainment area. Note that the facility is presently a synthetic minor source for the purposes of PSD permitting requirements as emissions of CO and NOx are limited below the major source threshold of 250 tpy.

2. Title V Major Source Status by Pollutant

Table 2: 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	✓	✓		
CO	✓	✓		
TRS	n/a			
H_2S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

Langboard OSB is an area source and not a major source of HAPs. Therefore, the following two MACT Standards apply to the facility:

40 CFR 63, Subpart CCCCCC, NESHAP for Gasoline Dispensing Facilities applies to the gas dispensing facility operated on-site by Langboard OSB.

40 CFR 63, Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines applies to the facility's two emergency generators and two emergency fire pump engines. Both are considered to be existing emergency engines.

The following MACT Standards do not apply to Langboard OSB:

40 CFR 63, Subpart DDDDD, NESHAP for Industrial/Commercial/Institutional Boilers and Process Heaters (The Boiler MACT) is not applicable to the facility because potential HAP emissions are estimated to be less than 10/25 tpy, and this is only applicable to the major sources of HAPs emissions.

40 CFR 63, Subpart DDDD, NESHAP for Plywood and Composite Wood Products (PCWP) is not applicable to the facility because it is not a major source of HAPs.

40 CFR 63 JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Industrial Boilers is not applicable to the facility because the Energy Systems (Source ID No. P001 and P002) are fuel burning equipment and not defined as boilers per this NESHAP.

4. Program Applicability (AIRS Program Codes)

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

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

VOC emissions from the Langboard's existing OSB plant are controlled by Energy System incineration, and emissions are estimated to be less than 250 tpy. Therefore, no condition limiting the pine usage was included in the existing permit (No. 2493-027-0013-V-03-0). However, since the existing plant's PTE individual and total HAPs emission were 5.52 and 6.44 tpy respectively, which are very close to the 10/25 tpy HAP major source thresholds, emissions of HAPs were capped. Since all major emission sources are to be routed through the Energy System, limiting HAP emissions from the Energy System will effectively limit HAP emissions facility wide. The following Condition 2.1.1, included in the Title V Permit No. 2493-027-0013-V-03-0, is carried over in this permit renewal:

2.1.1 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the entire facility any gases, which contain individual and total hazardous air pollutants (HAP), including but not limited to acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde in amounts in excess of 10 tpy and 25 tpy respectively during any twelve (12) consecutive months.
[MACT and 112(g) Avoidance Limit, 391-3-1-.02(2)(a)3]

B. Applicable Rules and Regulations

None Applicable.

NESHAP Subpart A – General Provisions applies to the facility because their emergency engines are subject to NESHAP ZZZZ.

NESHAP Subpart CCCCCC – Gasoline Dispensing Facilities applies to the facility because Langboard operates a gasoline dispensing facility on-site for several small vehicle and lawn maintenance engines (e.g., lawn mowers).

NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines applies to the facility since all emergency engines operated at the facility are considered to be existing stationary engines according to Subpart ZZZZ.

C. Compliance Status

The plant is currently operating in compliance per record.

D. Permit Conditions

Condition No. 2.1.1, requires the Permittee to limit individual and total HAP emissions to less than 10/25 tons per year to avoid being a major source of HAPs.

III. Regulated Equipment Requirements

A. 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**
P001	Energy System A (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	3.2.1, 3.2.3, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.4, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.7, 4.2.8, 5.2.1, 5.2.2, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 6.2.1, 6.2.3, 6.2.7, 6.2.8	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System
P002	Energy System B (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	3.2.1, 3.2.3, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.2, 3.5.4, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.7, 4.2.8, 5.2.1, 5.2.2, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 6.2.1, 6.2.3, 6.2.7, 6.2.8	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System
P003	Dryer System A (Single pass rotary flake dryer)	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 3.5.4, 4.2.5, 5.2.8, 5.2.11, 5.2.12, 5.2.13, 6.1.7, 6.2.1, 6.2.4	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B
P004	Dryer System B (Single pass rotary flake dryer)	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 3.5.4, 4.2.5, 5.2.8, 5.2.11, 5.2.12, 5.2.13, 6.1.7, 6.2.1, 6.2.4	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B
P005	Fines/Flake Screening	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.2, 3.5.3, 3.5.4, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.3, 6.2.9	C002	Fuel Storage Bin Vent
P006	Flake Handling/Blending	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 3.5.3, 3.5.4, 4.2.5, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.2.11, 5.2.13, 5.2.14, 6.1.7, 6.2.1, 6.2.3, 6.2.4, 6.2.9	C001 C004 P001 P002	Electrostatic Precipitator Flake Handling Baghouse Energy System A Energy System B
P007	Forming Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.2, 3.5.3, 3.5.4, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 6.1.7, 6.2.3, 6.2.5, 6.2.9	C008	Forming Line Baghouse
P008	Board Press	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.1, 3.5.2, 3.5.4, 3.5.5, 4.2.5, 4.2.6, 5.2.11, 5.2.13, 5.2.15, 6.1.7, 6.2.2, 6.2.4, 6.2.5, 6.2.6	P001 P002	Energy System A Energy System B
P009	Sander Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.2, 3.5.3, 3.5.4, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.3, 6.2.9	C006	Sander Line Baghouse
P010	Saw & Trim Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.2, 3.5.3, 3.5.4, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.3, 6.2.9	C003	Saw & Trim Baghouse

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P011	Fuel Relay & Storage Silo	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.2.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.5.2, 3.5.3, 3.5.4, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 6.1.7, 6.2.3, 6.2.9	C002	Fuel Storage Bin Vent

B. Equipment & Rule Applicability

Emission and Operating Caps:

The emission and operating Caps, as indicated in the existing Title V Permit No. 2493-027-0013-V-03-0 along with Title V Permit Amendment Nos. 2493-027-0013-V-03-1 and 2493-027-0013-V-03-2, are as follows:

The Energy System emits NOx and CO. The PTE indicated by the facility in their applications, for each of these pollutants, were not much less than the 250 tpy PSD major source threshold for each. To help assure that the facility stays a minor source for PSD, the following facility wide limits for NOx and CO emissions are imposed in their Title V Permit No. 2493-027-0013-V-03-0.

3.2.1 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from Energy System A and Energy System B (Emission Unit ID Nos. P001 and P002), combined, nitrogen oxides (NOx) or carbon monoxide (CO) equal to or in excess of 55 lb/hr (30 day rolling average).
[PSD Avoidance Limits]

NOx and CO emissions are estimated to be 55 lb/hr from both Energy Systems A and B, compared against the current emission cap of 57.05 lb/hr (Condition 3.2.1). Therefore, it is expected that the facility should be able to comply with the emission standards for CO and NOx with or without the operation of their emergency engines. The facility requested that the limit be lowered from 57.05 lb/hr to 55 lb/hr to ensure that the facility does not exceed 250 tpy in the event that the emergency engines have to be run.

To ensure that facility wide PM emissions limit is attainable and still below the 250 tpy PSD major source threshold, the Permittee accepted a PM emissions limit increase from 0.060 lb/MMBtu to 0.10 lb/MMBtu for filterable PM and 0.14 lb/MMBtu for Total PM emissions (filterable and condensable), from Energy System Units A and B (Emission Unit ID Nos. P001 and P002). The PM emissions are controlled by a dedicated ESP. Given the reliability of ESPs, it was therefore expected that the energy system will be in compliance with this limit. The PM limit is included in Condition 3.2.3, which was modified per Title V Permit Amendment 2493-027-0013-V-03-2 and indicated below.

3.2.3 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the Energy System (Source ID Nos. P001 and P002) stack (Source ID No. S001), downstream of the electrostatic precipitator (Source ID No. C001), any emissions in excess of the indicated rates:

a. Particulate Matter (PM) in excess of 0.10 lb/MMBtu (filterable content only). [40 CFR 60 Subpart Db]

b. Total PM in excess of 0.14 lb/MMBtu (filterable and condensable content). [PSD Avoidance Limit]

Title V Permit Amendment 2493-027-0013-V-03-2 also reduced the PM emission limit for the Forming Line (Source ID No. P007), Saw & Trim Line (Source ID No. P010) and the Sander Line (Source ID No. P009). Condition 3.2.2 below in Permit No. 2493-027-0013-V-04-0 will remain the same as in the amendment.

3.2.2 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the following process equipment, any gases that contain Particulate Matter (PM) in excess of the indicated rates:
[PSD Avoidance Limits]

a.	Forming (Source ID No. P007), Controlled by Forming Line Baghouse (APCD ID No. C008), And Saw & Trim Line (Source ID No. P010), Controlled by Saw & Trim Baghouse (APCD ID No. C003):	4.0 lb/hr.
b.	Sander Line (Source ID No. P009), Controlled by Sander Line Baghouse (APCD ID No. C006):	4.0 lb/hr.
c.	Flake Handling/Blending (Source ID No. P006), Controlled by Flaker Handling Baghouse (Source ID No. C004):	4.29 lb/hr.
d.	Fines/Flake Screening (Source ID No. P005) and Fuel Relay and Storage Silo (Source ID No. P011), Controlled by Fuel Storage Bin Vent Baghouse (APCD ID No. C002):	1.00 lb/hr.

Rules and Regulations Assessment:

<u>Energy System A & Energy System B (Source ID Nos. P001 and P002)</u>

The energy systems contain two 160 MMBtu/hr heat input capacity units. The combustion gases supply hot process air to the dryers for flake drying, the thermal oil heater for the board press and a steam turbine to produce steam for electrical power generation. Energy system flue gases are discharged from a single stack after passing through an ESP (Source ID No. C001) for particulate matter removal. Both energy systems are subject to the following rules and regulations:

The energy systems are considered as "fuel burning equipment" which requires them to be subject to GRAQC 391-3-1-.02(2)(d) – Fuel Burning Equipment which provide the equation to calculate the allowable PM emissions and the opacity limit.

GRAQC 391-3-1-.02(2)(g) – Sulfur Dioxide requires that all fuel burning sources having heat input of 100 million BTU's per hour or greater shall not burn a fuel containing more than 3 percent sulfur, by weight. The energy systems are subject to Rule (g) for sulfur dioxide. It burns only wood waste, so the sulfur content will always be much less than 3 percent; hence no monitoring is needed for sulfur dioxide.

NSPS Subpart A – General Provisions requires initial notification and performance testing, recordkeeping, monitoring, provides reference methods and mandates general control device requirements.

These fuel-burning units are defined as steam generating units. Each being above 100 MMBtu/hr heat input capacity and constructed after June 19, 1984, they are subject to NSPS Subpart Db- "Standards of Performance for Industrial-Commercial Institutional Steam Generating Units."

The NSPS requires start-up notification, an initial performance test for PM, fuel-usage record keeping, and calculation of the annual capacity factor for wood. Because neither Energy System Unit A nor B use any fossil fuel, they are not subject to any Subpart Db sulfur dioxide or nitrogen oxides limits but are required to calculate capacity factors to prove this status.

Dryer System A & B (Source ID Nos. P003 and P004)

These are two single pass rotary dryers with a maximum input rate of 75,000 pounds per hour. The heat used to operate the dryers is provided from Energy Systems A & B (Source ID Nos. P001 & P002). The dryers are subject to emission limits for VOCs and HAPS to avoid being subject to PSD.

The dryer systems are subject to GRAQC 391-3-1-.02(2)(e) – PM Emission from Manufacturing Processes, which contains an equation for the emission limit of PM. Since their exhaust emission is uncontrolled, CAM is not applicable.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Fines/Flake Screening (Source ID No. P005)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Flake Handling/Blending (Source ID No. P006)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Forming Line (Source ID No. P007)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Board Press (Source ID No. P008

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Sander Line (Source ID No. P009)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Saw & Trim Line (Source ID No. P010)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

Fuel Relay & Storage Silo (Source ID No. P011)

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

C. Permit Conditions

Condition 3.2.1 limits emissions of NOx and CO to 55 lb/hr for both Energy Systems combined.

The limit was lowered from 57.05 lb/hr to allow the facility to be able to run emergency engines if necessary and remain below the 250 tpy threshold.

Condition 3.2.2 requires the facility to not allow PM emissions above 4.0 lb/hr for Forming Line (Source ID No. P007), Saw & Trim Line (Source ID No. P010) and the Sander Line (Source ID No. P009). PM emissions should not exceed 4.29 lb/hr for the Flake Handling/Blending (Source ID No. P006) and 1.00 lb/hr for the Fines/Flake Screening (Source ID No. P005) and Fuel Relay and Storage Silo (Source ID No. P011).

Condition 3.2.3 requires that the facility's filterable PM emissions do not exceed 0.10 lb/MMBtu and the Total PM does not exceed 0.14 lb/MMBtu.

Condition 3.3.1 states that Energy System A or Energy System B should not exhibit opacity greater than 20 percent.

Condition 3.3.2 allows the facility to burn plant and office waste in Energy System A and Energy System B.

Condition 3.3.3 states the allowable levels of the constituents that are produced from used oil within the facility's process.

Condition 3.4.1 states the PM and opacity limits for Energy System A & Energy System B (Source ID Nos. P001 and P002).

Condition 3.4.2 limits the amount of sulfur that can be emitted from the Energy Systems (Source ID Nos. P001 and P002).

Condition 3.4.3 shows the equations to calculate the allowable emission of PM that is allowed for all manufacturing processes.

Condition 3.4.4 states that the facility cannot have visible emissions greater than 40% from any of the manufacturing processes.

Condition 3.4.5 states that the facility must take all precautions to keep fugitive dust out of the air.

Condition 3.4.6 states that the facility cannot have dust emitting at an opacity greater than 20%.

Condition 3.5.1 requires the facility to make sure air pollution control devices (APCD) are properly routed.

Condition 3.5.2 requires routine maintenance to be performed on all APCDs.

Condition 3.5.3 requires the facility to keep inventory of all filter bags.

Condition 3.5.4 requires the facility to operate all APCDs any time the associated equipment is running.

Condition 3.5.5 requires the facility to install capture devices.

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

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires the facility to perform a performance test for nitrogen oxide emissions.

Condition 4.2.2 requires the facility to conduct performance tests in 12 month intervals for PM.

Condition 4.2.3 states additional performance testing may be necessary for the change of fuel material.

Condition 4.2.4 requires the facility to determine compliance with the carbon monoxide emission limits upon request.

Condition 4.2.5 requires the facility to conduct performance tests at the outlet of the Energy System (Source Code ID Nos. P001 and P002) to determine the total HAPs.

Condition 4.2.6 defines an operating day for the previous conditions.

Condition 4.2.7 requires the facility to record the combustion zone temperatures.

Condition 4.2.8 requires the facility to conduct a performance test for PM emissions during the operation of baghouses.

Condition 4.2.9 requires the facility to record the pressure drop for every baghouse in use for testing in the previous condition.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to continuously monitor and record the pollutants.

Condition 5.2.2 requires the facility to continuously monitor and record necessary parameters.

Condition 5.2.3 requires the facility to have monitoring devices to measure the parameters in the previous condition.

Condition 5.2.4 requires the facility to check the exterior of units for holes or any sign of malfunction.

Condition 5.2.5 requires the facility to check the baghouses periodically for visible emissions.

Condition 5.2.6 requires the facility to submit a Preventive Maintenance Program within 60 days of permit issuance.

Condition 5.2.7 requires the facility to implement the Preventive Maintenance Program established in the previous condition.

Condition 5.2.8 requires the facility to determine 12 hour block averages of combustion zone temperatures.

Condition 5.2.9 requires the facility to determine 1 hour averages for secondary volts and secondary currents.

Condition 5.2.10 requires the facility to analyze on-site generated used oil burned at the facility once per year.

Condition 5.2.12 requires the facility to comply with the performance criteria for PM emissions from the Energy Systems (Source ID Nos. P001 and P002) and the Dryer Systems (Source ID Nos. P003 and P004).

Condition 5.2.13 requires the facility to comply with the performance criteria for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

Condition 5.2.14 requires the facility to comply with the performance criteria for PM emissions from Flake Handling (Source ID No. P006).

Condition 5.2.15 requires the facility to maintain natural draft openings.

C. Compliance Assurance Monitoring (CAM)

Both Energy Systems (Source ID Nos. P001 and P002) are subject to CAM for PM emissions.

Both Dryer Systems (Source ID Nos. P003 and P004) and Flake Handling/Blending (Source ID No. P006) are subject to CAM for PM, VOC and HAP emissions.

The Board Press (Source ID No. P008) is subject to CAM for VOC and HAP emissions.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a quarterly basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.1 requires the facility to keep their records in a format suitable for inspection.

Condition 6.1.2 requires the facility to report any malfunctions to the Division.

Condition 6.1.3 requires the facility to submit any failure to meet an emissions limitation.

Condition 6.1.4 requires the facility to report any excess emissions, exceedances and excursions.

Condition 6.1.5 provides which records should be kept by the facility where applicable.

Condition 6.1.6 requires the facility to maintain files of required measurements.

Condition 6.1.7 provides which excess emissions, exceedances and excursions should be reported.

Condition 6.2.1 requires the facility to maintain certain records for each Energy System (Source ID Nos. P001 and P002) operating day.

Condition 6.2.2 requires the facility to record the production of board from the Board Press (Source ID No. P008).

Condition 6.2.3 requires the facility to maintain records of maintenance performed on their air pollution control devices (APCDs).

Condition 6.2.4 requires the facility to maintain record of when emissions from the Dryer System (Source ID Nos. P003 and P004), Blending (Source ID No. P006) or the Board Press (Source ID No. P08) aren't being controlled.

Condition 6.2.5 requires the facility to use HAP emissions factors to calculate the total monthly emissions of each HAP.

Condition 6.2.6 requires the facility to use the results from the previous condition to calculate 12 month rolling totals for individual and total HAPs.

Condition 6.2.7 requires the facility to keep records of the daily amount of fuels burned.

Condition 6.2.8 requires the facility to use the records from the previous condition to calculate the annual capacity factor for wood and wood waste.

Condition 6.2.9 requires the facility to maintain a record of actions taken to reduce fugitive dust.

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.1 allows the facility to make any 502(b)(10) changes without Permit revision.

B. Alternative Requirements

Not applicable.

C. Insignificant Activities

Refer to http://gatv.georgiaair.org/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

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Condition 7.11.1 states under what conditions will require the facility to be subject to 40 CFR Part 82 Subpart F.

Condition 7.11.2 states under what conditions will require the facility to be subject to 40 CFR Part 82 Subpart B.

J. Pollution Prevention

Not applicable.

K. 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.

Addendum to Narrative