

Facility Name: **Beadles & Balfour, LLC**
City: Moultrie
County: Colquitt
AIRS #: 04-13-071-00016

Application #: TV-208335
Date Application Received: December 13, 2017
Permit No: 2421-071-0016-V-05-0

Program	Review Engineers	Review Managers
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Toxics	N/A	N/A
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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:**

Beadles & Balfour, LLC

2. Parent/Holding Company Name

Beadles & Balfour, LLC

3. Previous and/or Other Name(s)

Beadles Lumber Company

4. Facility Location

900 6th Street, Moultrie, Georgia 31768

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

Beadles & Balfour, LLC (hereinafter “facility”) is located in Colquitt County, which is in attainment for all criteria pollutants.

B. Site Determination

There are no applicable issues with regard to the site determination. There are no other facilities which could possibly be contiguous or adjacent and under common control.

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
2421-071-0016-V-04-0	February 6, 2015	Title V Permit for ownership change from Beadles Lumber to Beadles & Balfour, LLC. It revokes Title V Renewal Permit No. 2421-071-0016-V-03-0 that was issued on June 18, 2013.
Off Permit Change	April 13, 2017	Converting Kiln K002 for a wood-fired kiln to a natural gas fired kiln.
2421-071-0016-V-04-1	April 12, 2018	Title V Permit Amendment for converting Kiln K001 from a batch kiln to a continuous kiln.

D. Process Description

1. SIC Codes(s)

2421

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)

Beadles & Balfour, LLC produces dimensional lumber.

3. Overall Facility Process Description

This standard lumber mill produces non-dried wood products and kiln-dry dimensioned lumber. The kiln-dry dimensioned lumber making process starts with tree-length barked logs which are processed into lumber by debarking, sawing, kiln drying, and planing. Non-dried wood products are produced by omitting some of the latter steps.

The sawmill group (ID No. SMGP) receives debarked logs from the debarker (ID No. DB01). The debarked green logs are cut to varying dimensions by various saws within the sawmill group (ID No. SMGP). Wood scrap generated by SMGP is loaded onto rail cars for outside sale. The rough cut green lumber was dried in one of the three kilns (ID Nos. K001, K002, and K003) to reduce the moisture content from 50-60% to below 20%. The planer mill group (ID No. PMGP) processes dry rough cut lumber to produce untreated planed lumber. The finished lumber is packaged and then shipped off site.

The dry kilns (ID Nos. K001, K002, and K003) are all direct-fired units. Kiln K001 is converted into a continuous kiln in 2018, while the other two kilns remain as batch kilns. Continuous Kiln K001 and Batch Kiln K003 both burn dry wood shavings from PMGP (via the hammermill), while Batch Kiln K002 fires on natural gas.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Beadles & Balfour, LLC is located in Colquitt County, an attainment area for all criteria pollutants. The facility is not one of the 28 named source categories under Prevention of Significant Deterioration (PSD) regulations. Before the modification specified in Application No. TV-211549, the facility is classified as a minor source under PSD regulations; existing Condition 3.2.1 of Title V Permit No. 2421-071-0016-V-04-0 contained a throughput limit of 106 million board feet per year (MMbf/yr) for all three drying kilns (ID Nos. K001, K02, and K003) which limited the facility-wide volatile organic compounds (VOC) below 250 tons per year (tpy). With that throughput limit, none of the criteria pollutants and total greenhouse gases (Total GHG) has a potential-to-emit (PTE) over the associated PSD major source threshold.

In the K001 Conversion Project described in Application No. TV-211549, the facility proposed to avoid a PSD review by taking the “one-time doubling” provisions under PSD regulations. Facility-wide VOC emissions before the modification were capped below 250 tpy. The modification itself would cause less than 250 tpy VOC emission increase. After the modification, the facility became a major source for VOC under the PSD regulations because facility-wide VOC emissions exceeds 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	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes	✓		
NO _x	Yes			✓
CO	Yes			✓

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
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes			✓
Total GHG	Yes			✓

According to the narrative that explained Title V Permit Amendment No. 2421-071-0016-V-05-1, after the K001 conversion project, the facility would be major under Title V of 1990 CAAA for VOC and single hazardous air pollutant (HAP). The following table summarizes the facility-wide PTE.

Table 3: Facility-wide PTE (tpy) after The K001 Modification (with The 180-MMbf/yr Throughput Limit)							
Pollutant	K001	K002	K003	Sawmill/ Planer Mill	Total		Title V Major Source Threshold
NO _x	14.00	8.588	7.000		29.59	<	100
CO	36.50	7.214	18.25		61.96	<	100
VOC	200.0	60.00	100.0		360.0	>	100
SO ₂	3.285	0.05153	3.285		6.622	<	100
PM	7.000	2.100	3.500	24.25	36.85	<	100
PM ₁₀	5.200	1.560	2.600	11.22	20.58	<	100
PM _{2.5}	4.950	1.485	2.475	0.001392	8.911	<	100
Methanol	8.050	3.540	4.025		15.62	>	10
Formaldehyde	1.930	0.2299	0.9650		3.125	<	10
Acetaldehyde	2.250	0.08100	1.125		3.455	<	10
Hexane		0.1546			0.1546	<	10
Combined HAPs	12.23	4.007	6.115		22.35	<	25
Total GHG	27,540	10,260	27,540		65,340	<	100,000

3. MACT Standards

Since the facility is a major source for single HAP, the facility is subject to 40 CFR 63 Subpart DDDD "National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products." Please refer to Section III.B. of this Narrative for more detailed discussions.

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	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

- A. Emission and Operating Caps:
None applicable.
- B. Applicable Rules and Regulations
None applicable.
- C. Compliance Status
None applicable.
- D. Permit Conditions
None applicable.

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
K001	Dry Kiln No. 1 Continuous Kiln Converted in 2018 Fuel: Wood Capacity = 30 MMBtu/hr Throughput = 100 MMbf/yr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2.	3.2.1, 3.2.2, 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2, 6.2.3	N/A	None
K002	Dry Kiln No. 2 Batch Kiln Modified in 2017 Fuel: Natural Gas Capacity = 20 MMBtu/hr Throughput = 30 MMbf/yr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2.	3.2.1, 3.2.2, 3.2.4, 3.3.1, 3.4.1, 3.4.2, 6.2.1, 6.2.2	N/A	None
K003	Dry Kiln No. 3 Batch Kiln Installed in 2006 Fuel: Wood Capacity = 30 MMBtu/hr Throughput = 50 MMbf/yr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2.	3.2.1, 3.2.2, 3.2.3, 3.3.1, 3.4.1, 6.2.1, 6.2.2	N/A	None
SMGP	Sawmill Group Consists of Debarker, Sawmill, Wood Chipper	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.4.1, 3.4.2, 5.2.1	CYL1	Cyclone
PMGP	Planer Mill Group Consists of Planer Mill and Hog.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.4.1, 3.4.2, 5.2.1	CYL2	Cyclone
HM01	Hammer Mill 1 Installed in 1982	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.4.1, 3.4.2, 5.2.1	CYL3	Cyclone
HM02	Hammer Mill 2 Installed in 2006	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.4.1, 3.4.2, 5.2.1	CYL4	Cyclone

* 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.

B. Equipment & Rule Applicability

Emission and Operating Caps:

As discussed previously, the facility avoided a PSD review for the K001 Conversion by taking the “one-time doubling” provisions under PSD regulations. In order to limit the VOC additional emissions caused by the modification below 250 tpy, the facility proposed to cap the annual throughput by Kilns K001, K002, and K003, combined, at 180 million board feet per year (MMbf/yr). This throughput limit is included in Condition 3.2.2 of the proposed Title V renewal permit.

Note that the facility has not completed the K001 Conversion during the Division's review of the Title V permit renewal application. The 106-MMbf/yr combined annual throughput limit for Kilns K001 through K003 is needed to ensure that VOC emissions from all three kilns are below 250 tpy, and the source is a PSD minor source before the modification. This limit is included in Condition 3.2.1 of the proposed Title V renewal permit and is effective until Kiln K001 is converted into a continuous kiln.

The fuel specifications for the kilns are included in Conditions 3.2.3 and 3.2.4 of the proposed Title V renewal permit.

In Application No. TV-211549, the facility conducted a toxic impact analysis under the circumstances that the power vents are always in operation when Kiln K001 is in operation. Therefore, Condition 3.2.5 requires that the facility operates the power vents whenever Kiln K001 is in operation. A citation of "Georgia Air Toxic Guidelines" was added to this Condition. Any relaxation of such requirement would require that the facility re-conduct a facility-wide toxic impact assessment and demonstrate compliance with the GA Toxic Guidelines.

Rules and Regulations Assessment:

40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

According to Tables 2 and 3 of this Narrative, the facility is major for single HAP (methanol). According to 40 CFR 63.2231(a) and (b), the facility is subject to 40 CFR 63 Subpart DDDD, which is often referred to as the Plywood MACT, because it is a plywood and composite wood products (PCWP) manufacturing facility that manufactures kiln-dried lumber at a HAP major source. According to 40 CFR 63.2232(b), the lumber dry kilns (ID Nos. K001, K002, and K003) are affected sources. Please note that the kilns are not subject to any compliance options specified in Tables 1A and 1B to Subpart DDDD, any operating requirements specified in Table 2 to Subpart DDDD, or any work practice requirements specified in Table 3 to Subpart DDDD. According to 40 CFR 63.2252, the facility is only subject to the initial notification requirements specified in 40 CFR 63.9(b). The initial notification requirements were already complied with; therefore, the facility is considered to be in full compliance with the Plywood MACT.

The proposed Title V renewal permit only includes Condition 3.3.1 that subjects Kilns K001, K002, and K003 to all applicable provisions of 40 CFR 63 Subpart A and Subpart DDDD.

Georgia State Rules

The sawmill group (ID No. SMGP), planer mill group (ID No. PMGP), hammer mills (ID Nos. HM01 and HM02), and dry kilns (ID Nos. K001, K002, and K003) are each subject to Georgia Air Quality Rule 391-3-1-.02(2)(b) "Visible Emissions" and Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes." Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of their visible emissions to forty (40) percent. Since they were all installed after July 2, 1968, the allowable PM emission rate from each process is specified by Georgia Rule 391-3-1-.02(2)(e)1.(i), which is stated as follows:

$$E = 4.1 * P^{0.67} \quad \text{for process input weight rate up to and including 30 tons per hour.}$$

$$E = 55 * P^{0.11} - 40 \quad \text{for process input weight rate above 30 tons per hour.}$$

Where E equals the allowable PM emission rate in pounds per hour and P equals the process input weight rate in tons per hour.

With the cyclones (ID Nos. CYL1 through CYL4, the Division expects that SMGP, PMGP, HM01, and HM02 would comply with the associated GA Rule (b) and Rule (e) standards. In order to ensure proper operation of the cyclones, the facility is required by Condition 5.2.1 to conduct weekly exterior inspection.

Compliance with the GA Rule (e) PM emission standards for K001, K002, and K003 is expected as follows.

Table 10: GA Rule (e) PM Emission Standards for Kilns OSK1 and OSK3

Name/ID No.	Process Input Weight Rate (P) (MMbf/yr)	Process Input Weight Rate (P) (tons/hr)	Allowable Emission Rate (E) (lbs PM / hr)
Kiln K001	100	22.8	$P = 4.1 * 22.8^{0.67} = 33.3$
Kiln K002	30	6.85	$P = 4.1 * 6.85^{0.67} = 14.9$
Kiln K003	50	11.4	$P = 4.1 * 11.4^{0.67} = 20.9$

$$1 \text{ ft}^3 = 12 \text{ bf}$$

$$\text{Assumed Wood Density} = 48 \text{ lbs/ft}^3$$

$$100 \text{ MMbf/yr}$$

$$= (100,000,000 \text{ bf/yr}) * (1 \text{ ft}^3/12\text{bf}) * (48 \text{ lbs/ft}^3) * (1 \text{ ton}/2,000 \text{ lbs}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 22.8 \text{ tph}$$

$$30 \text{ MMbf/yr}$$

$$= (30,000,000 \text{ bf/yr}) * (1 \text{ ft}^3/12\text{bf}) * (48 \text{ lbs/ft}^3) * (1 \text{ ton}/2,000 \text{ lbs}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 6.85 \text{ tph}$$

$$50 \text{ MMbf/yr}$$

$$= (50,000,000 \text{ bf/yr}) * (1 \text{ ft}^3/12\text{bf}) * (48 \text{ lbs/ft}^3) * (1 \text{ ton}/2,000 \text{ lbs}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 11.4 \text{ tph}$$

For a lumber drying kiln, PM emission rate is 0.14 lb/Mbf.

$$\text{PM Emission Rate of K001}$$

$$= (0.14 \text{ lb PM/Mbf}) * (100 \text{ MMbf/yr}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 1.60 \text{ lbs PM/hr} < 33.3 \text{ lbs PM/hr}$$

$$\text{PM Emission Rate of Kiln K002}$$

$$= (0.14 \text{ lb PM/Mbf}) * (30 \text{ MMbf/yr}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 0.479 \text{ lbs PM/hr} < 14.9 \text{ lbs PM/hr}$$

PM Emission Rate of Kiln K003

$$= (0.14 \text{ lb PM/Mbf}) * (50 \text{ MMbf/yr}) * (1 \text{ yr}/8,760 \text{ hrs})$$

$$= 0.799 \text{ lbs PM/hr} < 20.9 \text{ lbs PM/hr}$$

The Division also believes that the kilns would also comply with the GA Rule (b) 40 percent opacity limit.

C. Permit Conditions

Condition 3.2.1 contains the existing PSD avoidance limit. It helps to maintain the facility's minor source status before the K001 Conversion, and also help the K001 Conversion avoid a PSD review by taking the "one-time doubling" provisions under PSD regulations.

Conditions 3.2.2 contains the new PSD avoidance limit for the K001 Conversion. It helps to cap the additional VOC emissions from Kiln1 K001 and K002 (K002 had the burners replaced in the project) below 250 tpy.

Condition 3.2.3 specifies that Kilns K001 and K003 can only burn wood.

Condition 3.2.4 specifies that Kiln K002 can only burn natural gas.

Condition 3.2.5 requires that the facility operate the power vents when Kiln K001 is in operation.

Condition 3.3.1 subjects Kilns K001, K002, and K003 to 40 CFR 63 Subpart A and Subpart DDDD.

Condition 3.4.1 subjects the dry kilns (ID Nos. K001, K002, and K003), Sawmill Group (ID No. SMGP), Planer Mill Group (ID No. PMGP), and hammer mills (ID Nos. HM01 and HM02) to the GA Rule (b) visible emission limit.

Condition 3.4.2 subjects K001, K002, K003, SMGP, PMGP, HM01, and HM02 to the GA Rule (e) PM emission limits.

Conditions 3.4.3 and 3.4.4 include the GA Rule (n) fugitive emission standards.

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

None applicable.

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

In order to ensure proper operation of the baghouses (ID Nos. CYL1 through CYL4) and continuous compliance with the GA Rule (b) visible emission limit and GA Rule (e) PM emission limits, the facility is required by Condition 5.2.1 to inspect and maintain records of each inspection of the cyclones for each week or portion of each week of operation of the associated emission units.

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, “Compliance Assurance Monitoring” because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant (PM). [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

Although the sawmill group (ID No. SMGP), planer mill group (ID No. PMGP), and hammer mills (ID Nos. HM01 and HM02) are all equipped with cyclones (ID Nos. CYL1 through CYL4), the Division believes that the control devices are installed to reclaim material rather than for achieving compliance with the GA Rule (b) visible emission standard and GA Rule (e) PM emission standards. Without the control devices, these sources could easily be categorized as fugitive emission sources. Therefore, the Division determines that SMGP, PMGP, HM01, and HM02 are not subject to the CAM requirements.

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 semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7 of the proposed Title V renewal permit contains the following definitions of exceedances and excursions:

- Subparagraph b.i. defines an exceedance as any twelve consecutive month period for which the total amount of wood products processed by the dry kilns (ID Nos. K001, K002, and K003), combined, exceeds 106,000,000 board feet. This subparagraph is effective until Kiln K001 is converted into a continuous kiln.
- Subparagraph b.ii. defines an exceedance as any twelve consecutive month period for which the total amount of wood products processed by the dry kilns (ID Nos. K001, K002, and K003), combined, exceeds 180,000,000 board feet. This subparagraph is effective after the initial startup of the converted K001.
- Subparagraph c.i. defines an excursion as any adverse condition revealed by an cyclone inspection required by Condition 5.2.1.
- Subparagraph c.ii. defines an excursion as any time Dry Kiln K001's power vents are not operated when K001 is in operation.

Conditions 6.2.1 and 6.2.2 require that the facility determine and record the monthly and 12-month total amount of lumber processed through Dry Kilns K001, K002, and K003, combined, for demonstrating compliance with the VOC PSD avoidance limits specified in Conditions 3.2.1 and 3.2.2.

The conversion of Dry Kiln K001 may not be completed by the time the proposed Title V renewal permit is issued. Therefore, Condition 6.2.3 is kept in the proposed Title V renewal permit and requires that the facility notify the Division when the converted K001 starts operation.

VII. Specific Requirements**A. Operational Flexibility**

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F is included in this Title V Renewal Permit. According to Application No. TV-208335, the facility operates equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None 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