Facility Name: **Roseburg Forest Products South, L.P. – Vienna Particleboard Plant**
City: Vienna
County: Dooly
AIRS #: 04-13-09300022

Application #: TV-44401
Date Application Received: February 13, 2017
Permit No: 2493-093-0022-V-05-0

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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:

   Roseburg Forest Products South, L.P. – Vienna Particleboard Plant

2. Parent/Holding Company Name

   Roseburg Forest Products

3. Previous and/or Other Name(s)

   Georgia-Pacific Vienna Particleboard

4. Facility Location

   551 Roseburg Road, Vienna, Georgia 31092-0187

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

   The facility is located in an attainment area

B. 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
2493-093-0022-V-04-0	August 13, 2012	Title V renewal
2493-093-0022-V-04-1	October 10, 2012	Administrative amendment

D. Process Description

1. SIC Codes(s)

   2493

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 manufactures particleboard.

3. Overall Facility Process Description

Raw Material Receiving, Storage, and Conveying

The facility manufactures particleboard from wood furnish, such as planer shavings, sawdust, plywood trim, saw trim, chips, etc. The wood furnish is shipped in by trucks, and is dumped into a covered hopper or directly into the yard. The wood consists primarily of southern yellow pine with lesser amounts of other woods. The furnish is then belt conveyed to a storage building or stockpiled outside. A front-end loader loads the raw material onto a conveyor belt for transfer to one of two storage silos.

Raw Material Screening

The wood furnish is sent from the storage silos to scalping screens. The large pieces are belt conveyed to a hammer mill (for size reduction), collected by a cyclone, and belt conveyed back to the scalping screens. The fines are screened again by the "732 screens" (coarse and fine). The "732 screens" also process materials that have been separated by the face screen (face dryer outlet). The particulate matter emissions from the cyclone are collected by a baghouse.

Refining

The fine and coarse material from the screening operation is milled for consistency in one of the six Bauer mills. Bauer mills No. 4 and 6 (ID No. 301) process the core material. The other four Bauer mills process the face material. The refining operation is enclosed in a building and exhaust gases are vented to cyclones.

Drying the Surface and Core Particles

The milled material is sent to one of two direct-fired rotary dryers to drive off the unwanted moisture, the desired moisture content being 4 to 5 percent. The dryers are fed by the unloading cyclones from the Bauer mills, and the dried material is collected by two cyclones for each dryer. The dryers were installed in 1969 and both burn wood waste as a primary fuel and natural gas as

a secondary fuel. After drying, the face material is screened to obtain the required consistency. The dried face and core materials are belt conveyed on separate covered conveyors to the forming area.

Blending the Resin

The dried face and core material is stored in bins before being fed into one of four sealed blenders. The blenders mix the wood with urea formaldehyde resin (adhesive), catalyst for resin, and wax emulsion, which serves as a water-repellant agent.

Forming Mat

The facility has one process line for forming the dried face and core material into a mat prior to pressing into the final product. The line operates with two former heads that lay down the face material and two former heads that lay down the core material. Dust particles from this operation are collected by a cyclone and a baghouse in series. The collected material is recycled and another cyclone is used to pick up the material collected by the baghouse and feed it back into the forming feed bins. The mat is conveyed past a mat roller that shaves off the top of the mat to obtain the required thickness. The mat passes through a pre-press, which loosely binds the particles together. The pre-pressed mat is trimmed on its sides and ends, and the trimmings fall into a bottom hopper. A cyclone picks up the trimmings, which are screened. The larger pieces are sent to the core reject bin and the fines are sent to the face reject bin.

Pressing

A steam heated, 14 platen multi-opening press compacts the mat into a board using heat and the precise amount of pressure.

Board Cooling

The separated boards dissipate heat in Board Cooling. The cooler provides a longer retention time to allow the board to cool and give time for the completion of the curing process.

Board Trimming

The trimming process consists of three different types of saws: skinner saws cut the correct widths, cross-cut saws cut the correct lengths, and strip saws make special cuts for customer demands. The trim waste is conveyed to a hog.

Board Sanding

The trimmed boards are sanded to the required finish prior to being stacked, banded and stored for shipment. The dust generated by the sanding operation is controlled by a baghouse (ID No. 525). The dust collected is transferred to the "blue dust bin."

Tongue and Groove Operation

Finished particleboard can be trimmed along the edges to form tongues and grooves in the particleboard per customer request. Particulate emissions are controlled by a baghouse (ID No. 576).

Hog Reclaim and Wood Fuel Storage

The hogged board trimmings are collected by a cyclone (ID No. 505A), which transfers the material to the raw material storage area. A cyclone (ID No. 508) collects the dust from the sander dust baghouses and sends it to the storage bin referred to as "blue dust bin" for use as a fuel in the boiler.

Boilers

A Babcock & Wilcox boiler, Boiler No. 1 (ID No. 600), rated at 27 MMBtu/hr and 26,000 lb/hr steam output, was installed in 1969, burns sander dust with a natural gas pilot light, and provides steam for the plant. Particulate matter emissions from the boiler are controlled by a Zurn multiclone. A second Babcock & Wilcox boiler, Boiler No. 2 (ID No. 700), rated at 37.5 MMBtu/hr, was installed in 1971, burns natural gas and also provides steam for the plant.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

This facility is classified as a major source of air emissions according to the new source review (NSR) prevention of significant deterioration of air quality (PSD) regulations. The facility is major for all criteria pollutants except sulfur dioxide, because the potential to emit (PTE) particulate matter, nitrogen oxides, carbon dioxide, and volatile organic compounds is each greater than the PSD major source threshold of 250 tons per year (ton/yr).

Note: The manufacture of oriented strand board is not one of the 28 named categories whose major source threshold is 100 ton/yr.

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	✓		

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
$PM_{2.5}$	Yes	✓		
SO_2	Yes			✓
VOC	Yes	✓		
NO_x	Yes	✓		
CO	Yes	✓		
TRS	N/A			
H_2S	N/A			
Individual HAP	Yes	✓		
Total HAPs	Yes	✓		

3. MACT Standards

The facility is a major source for Hazardous Air Pollutants (HAPs) because the PTE methanol and formaldehyde each exceeds 10 ton/yr, which is the major source threshold for any single HAP. Also, the combined HAPs PTE exceeds 25 ton/yr, which is the major source threshold for total HAPs.

40 CFR 63, Subpart DDDD regulates HAP emissions from Plywood and Composite Wood Products (PCWP) facilities that are major sources. The Plywood and Composite Wood Products (PCWP) MACT, 40 CFR Part 63 Subpart DDDD, published in the Federal Register (Vol. 69, No. 146/Friday, July 30, 2004), indicates that the MACT is applicable to a particleboard mill's dryers and board press. It is also applicable to green end operations, refining, resin preparation, blending and forming operations, and miscellaneous finishing operations.

It should be noted that on June 19, 2007, the D.C. Circuit Court partially vacated and remanded Subpart DDDD back to EPA. The court required that EPA carry out the MACT process again, since it was flawed. EPA was to include categories of emission sources for which EPA had determined that no controls would be required. The decision also vacated US EPA's extension of the PCWP MACT compliance deadline from October 1, 2007 to October 1, 2008 and vacated the low risk category for the PCWP MACT. On October 4, 2007, the U.S. District Court of Appeals issued a mandate, finalizing the court's June 19, 2007 decision. However, all other standards in Subpart DDDD were left unchanged. These included standards for dryers and presses.

As a result of the court decision and to comply with the PCWP MACT, Roseburg Forest Products South, L.P. – Vienna Particleboard submitted Application TV-17818 dated December 2, 2007, to install one new Bio-Oxidation System (biofilter) on the press. Biofilter 450B controls the exhaust flue gas from the existing press (450).

As required by the Clean Air Act Amendments of 1990, the Boiler MACT, found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD, was published in the

Federal Register (Vol. 69, No. 176/Monday, September 13, 2004). Because this facility is a major source of HAPs, that MACT was applicable.

However, on June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating in its entirety and remanding 40 CFR 63 Subpart DDDDD back to the EPA. The Court vacated the rule in conjunction with its partial vacatur of the Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration (CISWI) Units (40 CFR 60 Subparts CCCC and DDDD). The Court determined that the definition of a "solid waste incineration unit" under the CISWI rule was deficient. The Court's rejection of the definition of affected categories under the CISWI Rule is expected to shift many units, which are currently regulated under the Boiler MACT into the CISWI category. On July 30, 2007, the U.S. District Court of Appeals issued a mandate, finalizing the court's June 8, 2007 decision.

On February 21, 2011, the EPA Administrator signed the boiler MACT and boiler area source final rules. The final rules for 40 CFR 63, Subpart DDDDD (Boiler MACT), 40 CFR 63, Subpart JJJJJJ (Area Boiler GACT), and 40 CFR 60, Subparts CCCC and DDDD (CISWI) were published in the Federal Register on March 21, 2011. However, on May 18, 2011, the EPA published a notice delaying the effective date of the boiler MACT rule and the CISWI rule pending the completion of reconsideration or judicial review, whichever is earlier. On December 2, 2011, the EPA issued the Boiler MACT reconsideration proposal and proposed amendments to the Area Boiler GACT. The EPA accepted comment on the reconsideration proposal and the proposed amendments to the boiler GACT for 60 days following each publication in the Federal Register.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	N
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The facility has not indicated any non-compliance.

D. Operational Flexibility

None applicable.

E. Permit Conditions

None.

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**
600	Wood-Fired Boiler No. 1	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDDD GA Rule 391-3-1-.02(2)(d)1(ii) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.13 through 3.3.21, 3.4.1, 3.4.2, 3.4.4, 4.2.1, 4.2.11 through 4.2.14, 5.2.1, 5.2.4, 5.2.13, 5.2.14, 6.1.7c.i., 6.1.7c.iv., 6.2.12 through 6.2.20	BC1	Multiclone
700	Natural Gas-Fired Boiler No. 2	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDDD GA Rule 391-3-1-.02(2)(d)1(ii) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.18, 3.3.19, 3.4.1, 3.4.2, 3.4.4, 4.2.12	None	None
201	Hammer Mill	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.2.1, 3.4.2, 3.4.3, 5.2.4, 6.1.7c.iv	206A	Cyclone
202	Micro-Fines Screens	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.2.2, 3.4.2, 3.4.3, 3.5.1, 5.2.3, 6.1.7c.iii	208A 209A	Cyclone Baghouse
301	Bauer Mills 4 & 6	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 5.2.4, 6.1.7c.iv.	213	Dual Cyclone
302	Bauer Mills 2 & 3	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 5.2.4, 6.1.7c.iv.	217	Dual Cyclone
303	Bauer Mills 1 & 5	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 5.2.4, 6.1.7c.iv.	213 218	Dual Cyclone Dual Cyclone
350	Core Dryer/Burner	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.3.7, 3.4.2, 3.4.3, 3.4.4, 5.2.4, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 6.1.7c.iv., 6.1.7c.vi., 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	221	Dual Cyclones
360	Face Dryer/Burner	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.3.7, 3.4.2, 3.4.3, 3.4.4, 5.2.4, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 6.1.7c.iv., 6.1.7c.vi., 6.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	222	Dual Cyclones
400A	Forming	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 6.1.7c.ii.-iii.	409 410	Cyclone Baghouse
400B	Side/End Trimming	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 5.2.4, 6.1.7c.iv	403	Cyclone
450	Press	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.3.1, 3.3.2, 3.3.4, 3.3.5, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12, 3.4.2, 3.4.3, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 5.2.12, 6.1.7c.v., 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11	450B	Biofilter
460	Board Cooler	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
500	Sawing	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.3, 5.2.4, 6.1.7c.iii-iv	505 531	Cyclone Baghouse
550	Sanding	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3, 5.2.5, 5.2.6, 6.1.7c.ii.-iii.	525	Baghouse
575	Tongue and Groove Operation	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.2.3, 3.4.2, 3.4.3, 3.5.1, 5.2.2, 5.2.3, 6.1.7c.ii.-iii.	576	Baghouse
580	Group 1 Miscellaneous Coating	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	3.3.1, 3.3.2, 3.3.6, 3.4.2, 3.4.3, 6.1.7b.i., 6.2.7	None	None
	Plant Roads	GA Rule 391-3-1-.02(2)(n)	3.4.5, 3.4.6	None	None

B. Equipment & Rule Applicability

[Note that this facility has been temporarily closed for quite some time. The facility's Hammer Mill (ID No. 201) was scheduled to be used by Ensyn Georgia Biorefinery I, a proposed facility for the manufacture of renewable fuel oil (RFO) through the pyrolytic combustion of biomass in a Rapid Thermal Processing (RTP) unit.]

The emission units that need to be updated with respect to the rules in this renewal are the boilers. The boilers (ID Nos. 600 and 700) have been subject to 40 CFR 63, Subpart DDDDD – National Emission Standard for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. Specific permit conditions dealing with the boiler MACT are being added to the permit in this renewal.

Pursuant to 40 CFR 63.7500(e), the natural gas-fired boiler (ID No. 700) is not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4 of 40 CFR 63, Subpart DDDDD. However, the boiler is subject to the annual tune-up requirement because it is not equipped with the oxygen trim system. The boiler is also subject to the one-time energy assessment requirement.

The boiler (ID No. 600) is subject to the emission limits for suspension burners in Item 10 of Table 2. The boiler is subject to a tune-up every five years as indicated in Item 1 of Table 3 because it will be equipped with oxygen trim system upon restart.

The boilers (ID Nos. 600 and 700) are subject to the following rules:

40 CFR 63, Subpart A – General Provisions
40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
GA Rule 391-3-1-.02(2)(d)1(ii)
GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(g)

Hammer Mill (ID No. 201)

The hammer mill was installed in 1990. The hammer mill reduces the size of the overs from the two scalping screens and recycles them back to the scalping screens via Cyclone 206A, which exhausts to the atmosphere. The hammer mill is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Micro Fines Screens (ID No. 202)

The Micro Fines Screens were installed in 1986. They screen the recovered wood furnish from dual cyclones (ID No. 222) controlling the face dryer (ID No. 360). The overs from the screens are routed to Cyclone 208A and the PM emitted by the cyclone is vented to the atmosphere through Baghouse 209A. The micro fines screens are subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Bauer Mills (ID Nos. 301-303)

Bauer Mills 1, 2, and 4 were installed in 1969; Bauer Mill 3 was installed in 1987; and Bauer Mills 5 and 6 were installed in 1991. Bauer Mills are used to mill wood into particles prior to drying. Bauer Mills have two motors that face each other and have a 36" disc attached to the motor shaft; each disc has 6 grooved plates bolted to the disc. The plates are adjusted to approximately 50 thousandths of an inch and wood furnish is mechanically fed through openings in one disc around the shaft. Centrifugal force moves the wood from the center to the outer parts of the disc. One disc rotates clockwise as the other rotates counter clockwise milling the fibers to a desired particle size. The milled particles produced by Bauer Mills 1 and 5 are pneumatically transferred to the face or core dryer via Cyclone 218 or Cyclone 213; the milled particles produced by Bauer Mills 4 and 6 are pneumatically transferred to the core dryer via Cyclone 213; and the milled particles produced by Bauer Mills 2 and 3 are pneumatically transferred to the face dryers via Cyclone 217. The Bauer mills are subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Dryers and Burners (ID Nos. 350 and 360)

There are 2 dryers, each with a burner that provides heat for the dryer. There is a core dryer/burner and a face dryer/burner, both installed in 1969. The primary fuel for the burners is wood waste, with natural gas as back up.

Particle drying is necessary to reduce the moisture content of furnish to between three and eight percent, as required for use with liquid resins. Particle drying is continuous, with the particles normally dried in suspension by gases derived from the combustion of wood or natural gas. The

dried particles comprised of the core and the face components are conveyed separately to dual cyclones. The dryers and burners are subject to the following rules:

40 CFR 63, Subpart A – General Provisions
40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)
GA Rule 391-3-1-.02(2)(g

Forming (ID No. 400A)

The forming equipment was installed in 1969. Note that prior to forming, the particles are bound together with an adhesive such as urea-formaldehyde, phenol-formaldehyde, urea-melamine-formaldehyde, and soy-based resin. Between three and ten percent by weight of resin together with other additives used to impart such properties as fire resistance, etc., are blended under controlled conditions. RFP blends the wood particles in four sealed blenders using urea-formaldehyde resin, catalyst for resin, and wax emulsion, which serves as a water-repellant agent. This unit forms the blended particles into a mat on a flat metal plate called a caul. Forming is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Side/End Trimmings (ID No. 400B)

This unit was installed in 1969. As indicated, the formed mat is conveyed past a mat roller that shaves off the top of the mat to obtain the required thickness. The mat passes through a pre-press, which loosely binds the particles together. The pre-pressed mat is trimmed on its sides and ends, and the trimmings fall into a bottom hopper. Side/End trimmings are subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Press (ID No. 450)

The press was installed in 1969. It is a steam heated, 14 opening press. The press utilizes steam energy to apply heat and pressure to formed mats. There are two reasons for applying heat and pressure: (1) to press the material into a thin layer, and (2) to activate the thermosetting resins. The press loader accumulates fourteen screens, containing the particleboard mats, and then simultaneously loads them into the 14 openings of the press. The pressing operation is achieved at a temperature ranging from 300 to 360 °F and a pressure of 550 pounds per square inch (psi) and can take up to 300 seconds. As the board is pressed into a desired thickness by an automatic adjustment of the hydraulic pressure of the rams, the urea formaldehyde resin aids in bonding the particles together. The heat and pressure cure the mat into a hard, dense material known as particleboard. The press is subject to the following rules:

40 CFR 63, Subpart A – General Provisions
40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Board Cooler (ID No. 460)

The board cooler was installed in 1969. It is a conveyor equipped with wickets to hold the boards up on its edge and is located in the building after the press. It allows the boards to cool prior to stacking and storage. There is not a vent associated with the board cooler so emissions escape through various building openings. Emissions include PM, PM_{10}, VOC, formaldehyde, and phenol. The PM/PM_{10} emissions are subject to Georgia Rule (e) since the building openings are functionally vents and could be controlled.

The board cooler is an affected source per 40 CFR 63.2232. However, being an existing board cooler, there is no production, control, or work practice requirement in 40 CFR 63, Subpart DDDD. The board cooler is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Sawing (ID 500)

The sawing and hog unit was installed in 1969. It consists of the Skinner Saw, the Crosscut Saw, the Strip Saw, and the Saw Hog. This unit trims the board and hogs the trim. The particulate matter emitted by the saws is pneumatically conveyed to Cyclone 505, which is both a PM control device and a product recovery device. The particulate matter emitted by Cyclone 505 is pneumatically conveyed to Baghouse 531, which is the final PM control device for this unit. Sawing is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Sanding (ID No. 550)

The sanding unit was installed in April 2000. The sander sands the particleboard and the sander dust generated is pneumatically conveyed to Baghouse 525. The sander dust recovered by Baghouse 525 is pneumatically conveyed to the Blue Bin. Sanding is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

Tongue and Groove (ID No. 575)

This unit was installed in July 2003. This unit trims particleboard edges to form tongues and grooves. The particulate matter dust generated is pneumatically conveyed to Baghouse 576 for product recovery. The lighter particulate matter generated is emitted to the atmosphere. The Tongue and Groove unit is subject to the following rules:

GA Rule 391-3-1-.02(2)(b)
GA Rule 391-3-1-.02(2)(e)

C. Permit Conditions

Condition No.	Description
3.2.1	Existing condition 3.2.1, V-04-0. Pursuant to PSD avoidance and Rule 391-3-1-.03(2)(c), this condition limits PM from the Hammer Mill to 5 pounds per hour (lb/hr).
3.2.2	Existing Condition 3.2.2, V-04-0. Pursuant to PSD avoidance and Rule 391-3-1-.03(2)(c), this condition limits PM_{10} from the Micro-Fines Screens to 0.3 lb/hr.
3.2.3	Existing Condition 3.2.3, V-04-0. Pursuant to PSD avoidance and Rule 391-3-1-.03(2)(c), this condition limits PM from the Tongue and Groove Operations to 3.4 lb/hr.
3.3.1	Existing Condition 3.3.1, V-04-0. This condition requires the Permittee to comply with all applicable provisions of 40 CFR 63-National Emission Standards for Hazardous Air Pollutants Subpart A-General Provisions.
3.3.2	Existing Condition 3.3.2, V-04-0. This condition requires the Permittee to comply with all applicable provisions of 40 CFR 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. This ensures that the affected source is subject to all applicable requirements of 40 CFR 63, Subpart DDDD, even if a requirement has been unintentionally omitted from the permit. The condition also indicates that in the event of a discrepancy between the permit and 40 CFR 63, Subpart DDDD, the terms of 40 CFR 63, Subpart DDDD shall control.
3.3.3	Existing Condition 3.3.3, V-04-0. This condition requires the Permittee to comply with all applicable provisions of 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. This ensures that the affected source is subject to all applicable requirements of 40 CFR 63, Subpart DDDDD, even if a requirement has been unintentionally omitted from the permit. The condition also indicates that in the event of a discrepancy between the permit and 40 CFR 63, Subpart DDDDD, the terms of 40 CFR 63, Subpart DDDDD shall control.

Condition No.	Description
3.3.4	Existing Condition 3.3.4, V-04-0. Pursuant to 40 CFR 63.2240 and 40 CFR 63.2267, this condition requires the Permittee to install a wood products enclosure (defined in Condition No. 3.3.12) around Board Press (ID No. 450) to capture and vent all the VOC emitted to the biofilter (ID No. 450B). In the event that the enclosure does not meet the definition of wood products enclosure, the capture device is required to have a capture efficiency of at least 95 percent. Condition 3.3.4 also requires the Permittee to inform the Division in writing whenever it switches from the wood products enclosure to a capture device option.
3.3.5	Existing Condition 3.3.5, V-04-0. Pursuant to 40 CFR 63.2240(b), this condition requires that the biofilter (ID No. 450B) achieve a removal efficiency of at least 90 percent for formaldehyde. The Permittee may use any other option listed in Table 1B of 40 CFR 63, Subpart DDDD, provided the Permittee informs the Division in writing. [Note that this is one of the six options available in Subpart DDDD to demonstrate compliance. The Permittee has decided to use this option, so the permit specifies it.] Periodic testing is required. To assure continuous compliance, the Permittee is required to maintain the 24-hour block biofilter bed temperature within the range established per Condition 4.2.2.
3.3.6	Existing Condition 3.3.6, V-04-0. Pursuant to 40 CFR 63.2241(a) – Item No. 5, Table 3, this condition requires that only non-HAP coatings as defined in 40 CFR 63.2292 be applied for all miscellaneous coating operations. This is a work practice requirement to minimize the HAP emissions.
3.3.7	Existing Condition 3.3.7, V-04-0. Pursuant to 40 CFR 63.2241(a) – Item No. 1, Table 3, this condition requires that each dryer operate with (1) an inlet moisture content of less than or equal to 30 percent by weight, dry basis, and (2) an inlet dryer temperature of less than or equal to 600°F. This is a work practice requirement to assure that the dryers are "dry rotary dryers" as defined in 40 CFR 63.2292.
3.3.8	Existing Condition 3.3.8, V-04-1. Pursuant to 40 CFR 63.2250(a), This condition requires the Permittee to be in compliance with Condition No. 3.3.5 at all times when a process unit is in operation except during startup, shutdown, and malfunction of the process unit. This is to assure compliance, which will reduce emissions.
3.3.9	Existing Condition 3.3.9, V-04-0. Pursuant to 40 CFR 63.2250(b), this condition requires the Permittee to maintain the affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

Condition No.	Description
3.3.10	Existing Condition 3.3.10, V-04-0. Pursuant to 40 CFR 63.2250(c), this condition requires the Permittee to develop and implement a startup, shutdown, and malfunction plan (SSMP). The SSMP must describe in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of action for malfunctioning process and air pollution control equipment.
3.3.11	Existing Condition 3.3.11, V-04-0. Pursuant to 40 CFR 63.2251(e), this condition requires the Permittee to assure that, as much as possible, startups and shutdowns of emission control systems are scheduled during times when process equipment is also shutdown.
3.3.12	Existing Condition 3.3.12, V-04-0. Pursuant to 40 CFR 63.2292, this condition defines the design criteria that a capture device must have to be designated as a wood products enclosure.
3.3.13	New condition. Pursuant to 40 CFR 63.7500(a)(1) – Item No. 1, Table 2, Condition No. 3.3.13 limits the emissions of hydrogen chloride and mercury from Boiler 600 to 0.022 and 0.0000057 pound per million British thermal units (lb/MMBtu), respectively, except during startup and shutdown.
3.3.14	New condition. Pursuant to 40 CFR 63.7500(a)(1) – Item No. 10, Table 2, Condition No. 3.3.14 limits the emissions of carbon monoxide (CO) from Boiler 600 to 2,400 parts per million by volume dry basis (ppmvd).
3.3.15	New Condition. Pursuant to 40 CFR 63.7500(a)(1) – Item No. 10, Table 2, Condition No. 3.3.15 limits the emission of filterable particulate matter from Boiler 600 to less than 0.051 lb/MMBtu of heat input.
3.3.16	New condition. Pursuant to 40 CFR 63.7500(a)(2) – Item No. 6, Table 4, Condition No. 3.3.16 limits visible emissions the opacity which exceeds 10 percent or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation (daily block average).
3.3.17	New condition. Pursuant to 40 CFR 63.7500(a)(1) – Item No. 7, Table 4, Condition No. 3.3.17 requires the Permittee to maintain the 30-day rolling average operating load of Boiler 600 to less than or equal to 110 percent of the highest hourly average operating load recorded during the performance test.
3.3.18	New condition. Pursuant to 40 CFR 63.7500(a)(1) – Items 1, 3, 4, 5, and 6, Table 3, Condition 3.3.18 requires the Permittee to comply with the indicated work practice requirements for Boilers 600 and 700.
3.3.19	New condition. Pursuant to 40 CFR 63.7500(a)(3), Condition No. 3.3.19 requires the Permittee to operate and maintain Boilers 600 and 700 in a manner consistent with safety and good air pollution practices for minimizing emissions.

Condition No.	Description
3.3.20	New condition. Pursuant to 40 CFR 63.7505(d), Condition No. 3.3.20 requires the Permittee to develop a site-specific monitoring plan for Boiler 600 according to the requirements specified therein if the Permittee demonstrates compliance with any applicable emission limit through performance testing and subsequent compliance with operating limits using CPMS or CEMS or COMS.
3.3.21	New condition. Pursuant to 40 CFR 63.7505(e), Condition No. 3.3.21 requires the Permittee to develop and implement for Boiler 600 a written startup and shutdown plan (SSP).
3.4.1	Existing Condition 3.4.1, V-04-0. This condition indicates that Boilers 600 and 700 are subject to Georgia Rule (d), which sets limits for particulate matter emissions from fuel burning sources.
3.4.2	Existing Condition 3.4.2, V-04-0. This condition sets the visible emission limit for the indicated emission units at an opacity of less than 40 percent. Note that Boilers 600 and 700 are subject to the Rule (b) 40 percent opacity limit and not the Rule (d) 20 percent opacity limit, because each was in operation or under construction on or before January 1, 1972.
3.4.3	Existing condition, V-04-0. This condition sets the particulate matter emission limit for the indicated emission units not to exceed the Georgia Rule (e) limit.
3.4.4	Existing Condition 3.4.4, V-04-0. This condition sets the fuel sulfur content for fuel burned in Boilers 600 and 700, and Dryers 350 and 360 not to exceed 2.5 percent.
3.4.5	Existing Condition 3.4.5, V-04-0. This condition limits fugitive dust from roads to less than 20 percent opacity as required by Rule (n) – "Fugitive Dust."
3.4.6	Existing Condition 3.4.6, V-04-0. This condition requires the Permittee to take reasonable precautions to limit fugitive dust from roads to less than 20 percent opacity as required by Rule (n) – "Fugitive Dust."
3.5.1	Existing Condition 3.5.1, V-04-0. This condition requires that an inventory of filter bags be available to replace any defective bags. This is a best practices condition that minimizes emissions.

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 No.	Description
4.2.1	New condition. Pursuant to 40 CFR 63.7510(a)(1), (3), and (4) and 40 CFR 63.7515(a), (b), (c), Condition No. 4.2.1 requires the Permittee to conduct for Boiler 600 an annual performance tests for HCl, Hg, PM, and CO to establish operating limits and CMS performance evaluations.
4.2.2	Existing Condition 4.2.2, V-04-0. Pursuant to 40 CFR 63.2262(m)(1-3) and Table 4, this condition requires the Permittee to establish a range for the biofilter bed temperature during the initial performance test required by 40 CFR 63.2261.
4.2.3	Existing Condition 4.2.3, V-04-0. Pursuant to 40 CFR 63.2271 – Item No. 3, Table 7, this condition requires the Permittee to conduct a repeat performance test for the biofilter bed within two years following the previous performance test and within 180 days following the replacement of any portion of the biofilter bed media with a different media type or the replacement of more than 50 percent, by volume, of the biofilter bed media with the same type of media.
4.2.4	Existing Condition 4.2.4, V-04-0. Pursuant to 40 CFR 63.2267, this condition requires the Permittee to either use a wood products enclosure as defined in Subpart DDDD or measure the capture efficiency of the capture device for the press.
4.2.5	Existing Condition 4.2.5, V-04-0. Pursuant to 40 CFR 63.2262)(b)(1,2), this condition requires that performance tests be conducted during representative operating conditions vis-à-vis during startup, shutdown, or malfunction. This is to assure that the performance test results are representative of emissions during the normal operating conditions.
4.2.6	Existing Condition 4.2.6, V-04-0. Pursuant to 40 CFR 63.2262(c), this condition specifies the number of test runs that are required for each performance test required by Subpart DDDD.

Condition No.	Description
4.2.7	Existing Condition 4.2.7, V-04-0. Pursuant to 40 CFR 63.2262(d)(1), this condition specifies the proper location of sampling points during the performance test to determine the formaldehyde destruction efficiency.
4.2.8	Existing Condition 4.2.8, V-04-0. Pursuant to 40 CFR 63.2262(e), this condition requires that monitoring data be recorded at least once every 15 minutes during any performance test.
4.2.9	Existing Condition 4.2.9, V-04-0. Pursuant to 40 CFR 63.2262(g)(1), this condition specifies that non-detect data is to be counted as one half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbon emission rates.
4.2.10	Existing Condition 4.2.10, V-04-0. Pursuant to 40 CFR 63.2262(h), this condition defines the percent reduction of formaldehyde across the control system to be the product of the enclosure capture efficiency and the pollutant fractional reduction across the control device multiplied by 100. For press enclosures, designed for a 100 percent capture, the capture efficiency is 1.
4.2.11	New condition. Pursuant to 40 CFR 63.7510(j), Condition No. 4.2.11 requires the Permittee to conduct an initial compliance demonstration no later than 180 days after the restart of the boiler.
4.2.12	New condition. Pursuant to 40 CFR 63.7515(d) and 40 CFR 63.7540(a)(10), Condition No. 4.2.12 requires the Permittee to conduct a five year and an annual tune-up of Boilers 600 and 700, respectively, as indicated therein.
4.2.13	New condition. Pursuant to 40 CFR 63.7515(f), Condition No. 4.2.13 requires the Permittee to report the results of performance tests within 60 days after the completion of performance tests.
4.2.14	New condition. Pursuant to 40 CFR 63.7520, Condition No. 4.2.14 specifies the requirements for conducting a performance test for Boiler 600.

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 No.	Description
5.2.1	Existing Condition 5.2.1, V-04-0. This condition requires the daily measurement and recording of the pressure drop across Multiclone BC1 and the steam load for Boiler 600. These measurements are necessary to assure that the multiclone is working properly and to indirectly assess the heat input capacity of the boiler.
5.2.2	Existing Condition 5.2.2, V-04-0. This condition requires the periodic determination of the visible emissions from the Former baghouse, the Sander baghouse, and the Tongue and Groove baghouse. The visible emissions determination helps to assess the particulate loading of the flue gas and the operating performance of the baghouse.
5.2.3	Existing Condition 5.2.3, V-04-0. This condition requires the Permittee to develop and implement a preventive maintenance program for the Micro-Fines Screens baghouse, the Former baghouse, the Sanders baghouse, the Blue Bin baghouse, and the Tongue and Groove baghouse. This condition is a best practices measure to minimize emissions of air pollution.
5.2.4	Existing Condition 5.2.4, V-04-0. This condition requires the weekly inspection of cyclones attached to the Hammer Mill, the Bauer Mills, the Core Dryer, the Face Dryer, the Side/End Trimmer, and the Saw Hog for any evidence of malfunction and the prompt correction of any malfunction. This condition is a best practices measure to minimize emissions of air pollution.
5.2.5	Existing Condition 5.2.5, V-04-0. This condition indicates those units that are subject to Compliance Assurance Monitoring Rule of 40 CFR 64.
5.2.6	Existing Condition 5.2.6, V-04-0. This condition prescribes the CAM requirements for the Former baghouse and the Sander baghouse. Visible emissions and Preventive Maintenance Program are the parameters monitored to assure compliance. The emission units controlled by the baghouses are small PSEUs. Therefore, the visible emission check frequency is daily, the minimum frequency allowed by CAM. The pressure drop monitoring frequency is weekly.

Condition No.	Description
5.2.7	Existing Condition 5.2.7, V-04-0. This condition requires the Permittee to install, calibrate, maintain, and operate a system to continuously monitor (1) the temperature at representative locations of Biofilter 450B, (2) the temperature at the inlet of Dryers 350 and 360, and (3) the Furnish moisture at the inlet of Dryers 350 and 360. Monitoring of each dryer parameter is necessary to establish that each dryer is a "dry rotary dryer", that is, the furnish moisture content at the inlet of each dryer is less than or equal to 30 percent by weight, dry basis, and the temperature at the inlet of each dryer is less than or equal to 600°F.
5.2.8	Existing Condition 5.2.8, V-04-0. Pursuant to 40 CFR 63.2269(a)(1-3), this condition requires quality control and quality assurance for the monitoring of parameter(s) to assure that proper monitoring is taking place.
5.2.9	Existing Condition 5.2.9, V-04-0. Pursuant to 40 CFR 63.2269(b)(1-6), this condition requires quality control and quality assurance for the monitoring of parameter(s) to assure that proper monitoring is taking place.
5.2.10	Existing Condition 5.2.10, V-04-0. Pursuant to 40 CFR 63.2270(b), (c), (d), and (f), this condition requires quality control and quality assurance for the monitoring parameter(s) to assure that proper monitoring is taking place.
5.2.11	Existing Condition 5.2.11, V-04-0. Pursuant to 40 CFR 63.2269(c)(1 through 5), this condition requires that each dryer (350 and 360) furnish meter meet the requirements enumerated in the condition.
5.2.12	Existing Condition 5.2.12, V-04-1. Pursuant to 40 CFR 63.2271(b), this condition requires the Permittee to record each dryer inlet furnish moisture content and inlet temperature for a minimum of 30 calendar days and determine the highest moisture content and the highest temperature. The Permittee is required to submit a signed statement by a responsible official with the Notification of Compliance Status report stating that each dryer inlet furnish moisture content is less than or equal to 30 percent and that each dryer inlet temperature is less than or equal to 600°F. This condition is new, although the Permittee has been subject to 40 CFR 63, Subpart DDDD.
5.2.13	New condition. Pursuant to 40 CFR 63.7525(a)(7), this condition requires the Permittee to install an oxygen trim system with a level set no lower than the lowest hourly average oxygen concentration measured during the most recent performance test.
5.2.14	New Condition. Pursuant to 40 CFR 63.7525(d) and (e), this condition requires the Permittee to meet the requirements specified therein.

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 No.	Description
6.1.7.b.i.	Existing Condition 6.1.7.b.i., V-04-0. This condition defines as a deviation any instance in which a HAP coating, as defined in Subpart DDDD, is used in the miscellaneous coating operation and is required to be reported as an exceedance.
6.1.7.c.i-vi.	Existing Conditions 6.1.7.c.i.-iv., V-04-0. Each condition defines parameter limits, which when exceeded, must be reported as an excursion.
6.2.1	Existing Condition 6.2.1, V-04-0. Pursuant to 40 CFR 63.2280(c), this condition requires the Permittee to submit a written notification of the intent to conduct a performance test at least 60 days before the performance test.
6.2.2	Existing Condition 6.2.2, V-04-0. Pursuant to 40 CFR 63.2280(d), this condition requires the Permittee to submit a notification of compliance status if the Permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration.
6.2.3	Existing Condition 6.2.3, V-04-0. Pursuant to 40 CFR 63.2280(g), this condition requires that the Permittee notify the Director within 30 days before any of the stipulated action(s) in the condition is taken.
6.2.4	Existing Condition 6.2.4, V-04-0. Pursuant to 40 CFR 63.2281(a), this condition requires the Permittee to submit each report in Table 9 of 40 CFR 63, Subpart DDDD that applies to the Permittee.
6.2.5	Existing Condition 6.2.5, V-04-0. Pursuant to 40 CFR 63.2281(b), this condition requires the Permittee to submit each report by the date in Table 9 of 40 CFR 63, Subpart DDDD. These dates are specified in the condition.
6.2.6	Existing Condition 6.2.6, V-04-0. Pursuant to 40 CFR 63.2281(c), this condition requires that the Permittee's compliance report contain the information specified in the condition.

Condition No.	Description
6.2.7	Existing Condition 6.2.7, V-04-0. Pursuant to 40 CFR 63.2281(d), this condition enumerates the information required where the Permittee is not using a continuous monitoring system to monitor for a deviation from a compliance option, operating requirement, or work practice requirement.
6.2.8	Existing Condition 6.2.8, V-04-0. Pursuant to 40 CFR 63.2281(e), this condition enumerates the information required where the Permittee is using a continuous monitoring system to monitor for a deviation from a compliance option, operating requirement, or work practice requirement.
6.2.9	Existing Condition 6.2.9, V-04-0. Pursuant to 40 CFR 63.2281(g), this condition requires the Permittee to report all deviations defined in 40 CFR 63, Subpart DDDD in the semiannual monitoring report.
6.2.10	Existing Condition 6.2.10, V-04-0. Pursuant to 40 CFR 63.2282(a), this condition requires the Permittee to keep the records specified in the condition.
6.2.11	Existing Condition 6.2.11, V-04-0. Pursuant to 40 CFR 63.2282(b), this condition requires the Permittee to keep the records required by Condition Nos. 5.2.12 and 5.2.13.
6.2.12	New condition. Pursuant to 40 CFR 63.7545(e), this condition requires the Permittee to submit a Notification of Compliance Status for Boiler 600 as indicated therein.
6.2.13	New condition. Pursuant to 40 CFR 63.7550(c), this condition specifies the information a compliance report must contain for Boiler 600.
6.2.14	New condition. Pursuant to 40 CFR 63.7550(d), this condition specifies the information the compliance report for Boiler 600 must contain if the Permittee is not using a CMS to show compliance.
6.2.15	New condition. Pursuant to 40 CFR 63.7550(e), this condition specifies the information the compliance report for Boiler 600 must contain if the Permittee is using a CMS to show compliance.
6.2.16	New condition. Pursuant to 40 CFR 63.7550(h), this condition requires the Permittee to submit a report for Boiler 600 as indicated therein.
6.2.17	New condition. Pursuant to 40 CFR 63.7555(a), this condition specifies the records that must be kept for Boiler 600.
6.2.18	New condition. Pursuant to 40 CFR 63.7555(b), this condition indicates the records that must be kept for each CEMS, COMS, and continuous monitoring system for Boiler 600.
6.2.19	New condition. Pursuant to 40 CFR 63.7555(c), this condition requires the Permittee to keep the records required in Table 8 of 40 CFR 63, Subpart DDDDD among other records.
6.2.20	New condition. Pursuant to 40 CFR 63.7555(d), this condition requires the Permittee to keep the records indicated therein.

VII. Specific Requirements

A. Operational Flexibility – None applicable

B. Alternative Requirements – None 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 - None

E. Short-Term Activities - None

F. Compliance Schedule/Progress Reports - None

G. Emissions Trading - None

H. Acid Rain Requirements - None

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility operates equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

J. Pollution Prevention - None

K. Specific Conditions - None

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