

ISSUANCE DATE: March 28, 2019



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Interfor U.S. Inc. – Perry Mill
Facility Address: 903 Jernigan Street
Perry, Georgia 31069 Houston County
Mailing Address: P.O. Box 970
Perry, Georgia 31069
Parent/Holding Company: Interfor U.S. Inc.
Facility AIRS Number: 04-13- 153-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a permit for:

The construction and operation of one continuous direct-fired kiln (ID No. DK-6).

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-153-0011-V-05-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. TV-278859 dated **September 19, 2018**; any other applications upon which this Amendment or Permit No. 2421-153-0011-V-05-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **8** pages.



[Signed]

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Interfor U.S. Inc. – Perry Mill (hereinafter “facility”) submitted a Title V permit amendment application dated September 19, 2018, which was logged in as Application No. TV-278859, for the authorization to construct and operate one direct-fired continuous kiln (ID No. DK-6). The new kiln is rated at approximately 120 million board feet per year (MMbf/yr) and is capable of burning only green sawdust.

To support the new kiln, the facility will install a fire suppression system that is equipped with two engines, a primary electric engine and a backup diesel-fire engine. The diesel engine will only be operated for emergency situations and maintenance/readiness testing.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
DK-6	Drying Kiln No. 6 Direct-fired / Continuous Fuel Type = Wood Capacity = 120 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. 391-3-1-.02(2)(n)	3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.3.9, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 6.1.7, 6.2.12, 6.2.13, 6.2.14	N/A	None

* 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.

3.2 Equipment Emission Caps and Operating LimitsNew Conditions

- 3.2.1 The Permittee shall construct and operate the drying kiln (ID No. DK-6) in accordance with the application submitted. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action. [391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(1)]
- 3.2.2 Approval to construct the drying kiln (ID No. DK-6) shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date. For purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9). [391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(2)]
- 3.2.3 The Permittee shall not process more than 120 MMbf of wood products in the drying kiln (ID No. DK-6) during any twelve consecutive months. [PSD Avoidance – 40 CFR 52.21]
- 3.2.4 The Permittee shall not fire any fuel other than wood in the drying kiln (ID No. DK-6). [391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]

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3.2.5 The Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for Drying Kiln DK-6. The program shall be subject to review and modification by the Division. At a minimum, the following operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs:

[391-3-1-.02(6)(b)1, 40 CFR 52.21(j), and 40 CFR 70.6(a)(3)(i)]

- a. General Work Practice Standards for Wood-Drying Kiln Operation:
 - i. Routines for periodic preventative maintenance are detailed in Paragraphs b, c, d, e, and f of this condition, and are based on manufacturer's recommendations.
- b. Routine Before or During each Kiln Charge:
 - i. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - ii. Ensure that the kiln computer controller is functioning properly.
 - iii. Check to verify that the heating system is operating properly.
- c. Weekly Routine:
 - i. Ensure all amp-meters are operational.
- d. Monthly Routine:
 - i. Grease lumber truck wheels.
 - ii. Ensure control room's air conditioner/heater is working properly for maintaining correct temperature for electrical components.
- e. Semi-Annually:
 - i. Check connection on all RTDs.
- f. Annually:
 - i. Inspect wet bulb socks and replace as needed. Replace a sock if it has a tendency to become hard. Check water flow to the wet bulb.
 - ii. Ensure that all Resistance Temperature Detectors (RTDs) are in the airflow.
 - iii. Check all baffles for damage, record problems and repairs done.
 - iv. Drain oil or water from transducer air supplies.
 - v. Clean tracks through kilns, to remove accumulated dust.

- vi. Check bearing bolts on fans.
- vii. Check motor/fan drive belts. Grease fan motors and bearings, and inspect fans for damage. Check fan clearance and rotation. Adjust tension and replace belts if required.
- viii. Inspect kiln walls and doors for deterioration; schedule repairs if necessary.
- ix. Inspect temperature sensor mounts for damage.
- x. Inspect air-venting motors for proper attachment to the mounting bases; ensure that arms are functioning properly.
- xi. Check tracks for damage.
- xii. Inspect area at base of kiln door for damage.
- g. The Permittee shall correct any adverse condition, discovered by an inspection done in accordance with this condition, in the most expedient manner possible and note the corrective action taken. If not immediately correctable, the Permittee shall implement a corrective action plan within 24 hours after an adverse condition has discovered during inspections per Paragraphs b. through f. A record of the adverse condition and the corrective action(s) taken shall be kept.

- 3.2.6 The Permittee shall operate the power vents on Drying Kiln DK-6 at all times when DK-6 is in operation.
[Georgia Air Toxic Guidelines]

3.3 Equipment Federal Rule Standards

New Condition

- 3.3.9 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” for operation of the drying kiln (ID No. DK-6).
[40 CFR 63 Subpart A and Subpart DDDD]

3.4 Equipment SIP Rule Standards

New Conditions

- 3.4.7 The Permittee shall not cause, let, suffer, permit or allow emissions from the drying kiln (ID No. DK-6), the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]
- 3.4.8 The Permittee shall not cause, let, suffer, permit, or allow the emission from the drying kiln (ID No. DK-6) contain particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below.
[391-3-1-.02(2)(e)1.(i)]
- a. $E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.
 - b. $E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;
P = process input weight rate in tons per hour.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**New Condition

6.1.8 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any twelve consecutive month period for which the total amount of lumber dried in Drying Kiln DK-6 exceeds 120 million board feet.

- ii. Any time that the fuel burned in Drying Kiln DK-6 does not meet the requirements specified in Condition 3.2.4.

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. Any time Drying Kiln DK-6's power vents are not operated while DK-6 is in operation.

6.2 Specific Record Keeping and Reporting RequirementsNew Conditions

6.2.12 The Permittee shall furnish the Division written notification as follows:

[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1.]

- a. The actual dates of initial startup of the drying kiln (ID No. DK-6), within 15 days after such dates.

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- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.
- 6.2.13 The Permittee shall maintain monthly records of the amount of the dried lumber processed through the drying kiln (ID No. DK-6) to confirm compliance with the production limit in Condition 3.2.3. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the day of record. The Permittee shall notify the Division in writing if the production through Drying Kiln DK-6 exceeds 8.92 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 3.2.3.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.14 The Permittee shall, each month, calculate and record the twelve-month rolling total of the board feet of lumber dried in the drying kiln (ID No. DK-6), using the monthly records required in Condition No. 6.2.13. A twelve- month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

List Of Standard Abbreviations

[illegible]

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ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	1
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a “designated facility” as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	1
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	12
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	2
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	30
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	16
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	20
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Fuel Silo (For Kiln DK-6)	1

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ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
Sawmill (Log Sawing)	1	No	Yes	Yes
Debarker	1	No	Yes	Yes
Truck loading (chip, bark, sawdust and shaving)	4	No	Yes	Yes
Material Transfer (chip, bark, sawdust and shaving)	4	No	Yes	Yes
In-Plant roads (unpaved and paved roads)	1	No	No	Yes

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

ATTACHMENT C

LIST OF REFERENCES

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/software/tanks/index.html.
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).