Facility Name: **Interfor U.S. Inc. – Perry Lumber Mill**
City: Perry
County: Houston
AIRS #: 04-13-153-00011

Application #: TV-233009
Date Application Received: March 8, 2018
Permit No: 2421-153-0011-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:Interfor U.S. Inc. = Perry Lumber Mill

2. Parent/Holding Company Name

   Interfor U.S. Inc.

3. Previous and/or Other Name(s)

   Tolleson Lumber Company, Inc. – Perry Mill till March 14, 2014.
   Interfor South U.S. LLC – Perry Mill till January 4, 2017

4. Facility Location

   903 Jernigan Street, Perry (Houston County)

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

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

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
2421-153-0011-V-04-0	May 30, 2014	Name and Owner Change
2421-153-0011-V-04-1	December 29, 2014	Name change
2421-153-0011-V-04-2	February 24, 2016	Installation of Electrostatic Precipitators downstream of the wood-fired boiler multiclone
2421-153-0011-V-04-3	January 4, 2017	Incorporate Boiler MACT conditions in permit
Off-Permit Change	April 10, 2017	Optimize and upgrade sawmill increasing capacity by 1.5 MMBF/year.

D. Process Description

1. SIC Codes(s)

2421- Sawmills and Planer mills

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 sawmill processes yellow southern pine lumber to produce green and kiln dried lumber, bark, sawdust (green and dried), wood shavings and wood chips.

3. Overall Facility Process Description

This facility is a sawmill that primarily processes southern yellow pine logs. The logs are prepared prior to being cut into boards of various sizes, sorted, dried, planed, graded, stored, and shipped. Planed lumbers are the final products of the facility. The operations at this facility include:

<u>Log Preparation</u>
The inbound logs are received and stacked, prior to processing. The logs are retrieved and cut to length prior to debarking. The cut-to-length and debarked logs are then sent to a sawmill for additional processing.

<u>Sawmill</u>
The sawmill cuts the logs into various sized rough lumbers depending on the grades input to the saw by a grading device. The sized rough lumbers are sent to lumber kilns for drying.

<u>Drying Kilns</u>
Drying kilns receive sorted and stacked green rough lumbers from the sawmill. The drying kilns are heated by steam generated from three on-site wood-fired boilers. The dried rough lumbers are sent to the planer mill for additional processing. The drying kilns are indirect-fired batch kilns. The total production capacity for all the drying kilns is 162 MMBF/year. The production capacity of the individual drying kilns are DK-1 – 61.5 MMBF/yr, DK-2 – 13 MMBF/yr, DK-3 – 9 MMBF/yr, DK-4 – 41.7 MMBF/yr and DK-5 – 36.7 MMBF/yr

Planer Mill

The planer mill receives sorted and dried rough lumbers from the drying kilns. The dried rough lumbers are planed, graded, sorted, and then stacked. The dry finished lumbers are stored for shipment off-site with a portion being sent to a Reman Mill for additional processing.

Reman Mill

The Reman mill receives sorted and stacked dry lumbers finished by the planer mill. The lumbers are planed and shaped prior to being graded, sorted, and stacked. The finished lumbers are stored for shipment.

Boiler

The three wood-fired boilers burn bark, clean wood scrap, and sawdust generated by various onsite processes as fuel. The boilers provide steam used to heat the drying kilns for drying the green lumbers from the sawmill. PM emissions from the boilers are controlled by ESPs downstream from the boiler multiclones.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility is a major source under the New Source Review (NSR)/Prevention of Significant Deterioration of Air Quality (PSD) regulations because the potential emissions of volatile organic compounds (VOC) and carbon monoxide (CO) from the facility exceed the major source threshold of 250 tons per year (tpy).

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM_{10}	✓			✓
$PM_{2.5}$	✓	✓		
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓			✓
CO	✓	✓		
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

NESHAP Subpart DDDD regulates HAP emissions from plywood and composite wood products (PCWP) manufacturing facilities that are major HAP sources. The PCWP MACT was initially finalized by U.S. EPA on July 30, 2004, and was reissued and amended after reconsideration on February 16, 2006. The rule was partially vacated and remanded by the D.C. Circuit Court of Appeals in June 2007, which led to the rule being finalized in October 2007. EPA is in the process of requesting and collecting information from plywood and composite wood product facilities, to evaluate further rule amendments. However, at this time, since no rule changes have been proposed, Interfor evaluated the rule applicability based on the final rule from 2007. Upon issuance of a proposed of final amendment to this rule in the future, Interfor will evaluate potential mill applicability.

Lumber kilns are process units within the existing "affected source" under the PCWP MACT, defined in 40 CFR 63.2232(b). However, based on §63.2252, for process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), the Perry Mill is not required to comply with the compliance options; work practice requirements; performance testing; monitoring; startup, shutdown, and malfunction (SSM) plans; and recordkeeping or reporting requirements of NESHAP Subpart DDDD, or any other requirements in NESHAP Subpart A, *General Provisions*, except for the initial notification requirements in §63.9(b). Although the lumber kilns are an affected source, there are no applicable requirements for the indirect-fired batch kilns at the mill, except for the notification.

NESHAP Subpart DDDDD, *National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* (Major Source Boiler MACT) regulates boilers and process heaters at major sources of HAP. The boilers at the Perry Mill were constructed prior to June 4, 2010 and have not been reconstructed since that date; therefore, they are classified as existing units under Boiler MACT.

Each boiler combusts wood, including bark, clean wood scrap, and sawdust generated by various onsite processes for fuel. Therefore, these units are categorized in the "unit designed to burn biomass/bio-based solid subcategory." More specifically, each unit is a stoker-grate boiler designed to burn wet biomass fuel as the fuel combusted in the unit exceeds 20 percent moisture content on an annual heat input basis. The boilers are subject to the emission limitations contained in Table 2 to 40 CFR 63 Subpart DDDDD. Specifically, the boilers are subject to the HCl and Hg emissions limits applicable to "units in all subcategories designed to burn solid fuel" as well as the Filterable PM and CO emission limits applicable to "stokers/sloped grate/other [boilers] designed to burn wet biomass fuel."

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no

Program Code 9 - NSPS	yes
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The AIRS platform indicates an open enforcement action arising from the last facility inspection.

D. 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**
B-1	Wood-fired boiler # 1 28 MMBTU/hr constructed 1996	40 CFR 60, Subparts A & Dc 40 CFR Part 63, Subparts A & DDDDD GA Rule 391-3-1-.02(2)(d)2.ii GA Rule 391-3-1-.02(2)(d)3. GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.4.1, 3.4.2, 4.1.3, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 5.2.1, 5.2.2, 5.2.3, 5.2.6, through 5.2.12, 6.1.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5 through 6.2.11	BC-1 BP-1	Boiler No. 1 Multiclone Dry Electrostatic Precipitator (ESP)
B-2	Wood-fired boiler # 2 28 MMBTU/hr constructed 1998	40 CFR 60, Subparts A & Dc 40 CFR Part 63, Subparts A & DDDDD GA Rule 391-3-1-.02(2)(d)2.ii GA Rule 391-3-1-.02(2)(d)3. GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.4.1, 3.4.2, 4.1.3, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 5.2.1, 5.2.2, 5.2.3, 5.2.6, through 5.2.12, 6.1.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5 through 6.2.11	BC-2 BP-2	Boiler No. 2 Multiclone Dry Electrostatic Precipitator (ESP)

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
B-3	Wood-fired boiler # 3 28 MMBTU/hr constructed 2002	40 CFR 60, Subparts A & Dc 40 CFR Part 63, Subparts A & DDDDD GA Rule 391-3-1-.02(2)(d)2.ii GA Rule 391-3-1-.02(2)(d)3. GA Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.4.1, 3.4.2, 4.1.3, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 5.2.1, 5.2.2, 5.2.3, 5.2.6, through 5.2.12, 6.1.7, 6.2.1, 6.2.2, 6.2.4, 6.2.5 through 6.2.11	BC-3 BP-3	Boiler No. 3 Multiclone Dry Electrostatic Precipitator (ESP)
PLM1	Planer mill # 1	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(n)	3.4.3, 3.4.4, 3.4.5, 5.2.3, 5.2.4, 5.2.6, 6.1.7, 6.2.2, 6.2.3	PC-1	Planer Mill Cyclone # 1
PLM2	Reman planer mill # 2	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(n)	3.4.3, 3.4.3, 3.4.5, 5.2.3, 5.2.4, 5.2.7, 6.1.7, 6.2.2, 6.2.3	PC-2	Reman Cyclone # 2
DK-1	Batch Drying kiln No. 1	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) GA Rule 391-3-1-.02(2)(n)	3.3.2, 3.3.3, 3.4.3, 3.4.4, 3.4.5, 6.2.3	None	None
DK-2	Batch Drying kiln No. 2	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) GA Rule 391-3-1-.02(2)(n)	3.3.2, 3.3.3, 3.4.3, 3.4.4, 3.4.5, 6.2.3	None	None
DK-3	Batch Drying kiln No. 3	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) GA Rule 391-3-1-.02(2)(n)	3.3.2, 3.3.3, 3.4.3, 3.4.4, 3.4.5, 6.2.3	None	None
DK-4	Batch Drying kiln No. 4	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) GA Rule 391-3-1-.02(2)(n)	3.3.2, 3.3.3, 3.4.3, 3.4.4, 3.4.5, 6.2.3	None	None
DK-5	Batch Drying kiln No. 5	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) GA Rule 391-3-1-.02(2)(n)	3.3.2, 3.3.3, 3.4.3, 3.4.4, 3.4.5, 6.2.3	None	None
INRD	In-plant roads	GA Rule 391-3-1-.02(2)(n)	3.4.5, 6.2.3	None	None

B. Equipment & Rule Applicability

All three wood-fired boilers are subject to all applicable requirements of the boiler NSPS 40 CFR 60 Subpart Dc because they are rated over 10 MMBTU/hour and are constructed after June 9, 1989. The boilers are subject to Subpart Dc recordkeeping requirements.

The wood-fired boilers are subject to all applicable requirements of the major source boiler MACT 40 CFR 63 Subpart DDDDD including emission limits, monitoring, testing, recordkeeping and reporting requirements. The boilers are also subject to the Georgia Rules (d) and (g) for opacity, PM emissions and fuel sulfur content.

The five indirect-fired batch drying kilns at the facility are subject to the requirements of the Plywood and Composite Wood Product (PCWP) MACT (40 CFR 63 Subpart DDDD).

Drying kilns at lumber mills the kilns are only subject to one-time notification under the PCWP MACT. The drying kilns are also subject to the Georgia Rules (b) and (e) for opacity and PM emissions Georgia

The planer mill and the reman mill are subject to Georgia Rule (b) for opacity and Rule (e) for PM emissions.

Rule (n) applies to fugitive emissions from all sources at the lumber mill.

Emission and Operating Caps:
The sawmill, the drying kilns and the planer mills are not subject to any operating caps. The boilers at the lumber mill are subject to the boiler MACT emission limits and emission limits under Georgia Rule (d). The drying kilns and the planer mills are subject to opacity limits under Georgia Rule (b) and PM emission limits under Georgia Rule (e). Georgia Rule (n) limits fugitive emissions from all sources at the lumber mill.

C. Permit Conditions

Condition 3.3.1 states that all three wood-fired boilers are subject to all applicable requirements of the boiler NSPS (40 CFR 60 Subpart Dc). However Subpart Dc does not have any requirement for wood-fired boilers.

Condition 3.3.2 states that the drying kilns at the facility are subject to all applicable requirements of the Plywood and Composite Wood Product (PCWP) MACT (40 CFR 63 Subpart DDDD). The only requirements applicable under this MACT to drying kilns at the lumber mills is a one-time notification. (Conditions 3.3.2 and 3.3.3 in the current permit are combined to a single condition since these conditions were the same). The remaining conditions in Section 3.3 were renumbered in the renewal permit.

Condition 3.3.3 subject all three wood-fired boilers to all applicable requirements of the boiler MACT (40 CFR 63 Subpart DDDDD) since the facility is a major source of HAPS (methanol) emissions.

Condition 3.3.4 is the boiler MACT emission limit for CO, PM, HCl and Hg emissions from the three wood-fired boilers.

Condition 3.3.5 lists the biomass fuels that can be fired in the wood-fired boilers.

Condition 3.3.6 is the startup requirements for the wood-fired boilers under the boiler MACT.

Condition 3.3.7 is the shutdown requirements for the wood-fired boilers under the boiler MACT.

Condition 3.3.8 is the requirements to operate the wood-fired boilers in such a way as to minimize emissions as per the boiler MACT requirements.

Condition 3.4.1 is the PM and Opacity limits for emissions from the wood-fired boilers per Georgia Rule (d).

Condition 3.4.2 is the fuel sulfur limit under Georgia Rule (g) for the biomass-fired in the boilers.

Condition 3.4.3 limits visible emissions to 40% opacity from the drying kilns and the planer mills per Georgia Rule (b).

Condition 3.4.4 limits PM emissions from all manufacturing process per Georgia Rule (e).

Condition 3.4.5 lists some of the measures that can be taken to minimize fugitive emission per Georgia Rule (n).

Condition 3.4.6 limits fugitive emissions opacity to 20% per Georgia Rule (n)2.

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

A. General Testing Requirements

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

B. Specific Testing Requirements

Condition 4.2.1 is the periodic performance tests for CO, PM, HCl and Hg emissions from the boilers annually required by the boiler MACT. If the tested emissions are less than 75% of the standard the tests can be repeated once every three years.

Condition 4.2.2 describes the performance test procedures for the boiler MACT performance tests.

Condition 4.2.3 requires testing of emissions if the fuel fired in the boiler is changed or switched. The retests are not required if the fuel analysis demonstrates that the new fuel(s) does (do) not increase the chlorine or mercury input into the unit.

Condition 4.2.4 requires the Permittee to establish the operating limits for each of the wood-fired boiler required by the boiler MACT.

Condition 4.2.5 requires reporting the results of the performance tests within 60 days after the completion of the performance tests.

Condition 4.2.6 requires boiler tune ups once every five years.

Condition 4.2.7 requires the Permittee to measure the secondary voltage (kV) for each field of the electrostatic precipitators every 15 minutes during the entire period of the PM performance tests. This condition also requires establishment of a minimum hourly average secondary voltage that indicates proper operation of the ESPs and compliance with the PM emission limit specified in Condition 3.3.4b.

V. Monitoring Requirements

A. General Monitoring Requirements

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

B. Specific Monitoring Requirements

Condition 5.2.2 states that the three wood-fired boilers and the planer mill and the Reman mill are subject to all applicable provisions of the CAM program for PM emissions.

Condition 5.2.3 states that for the three wood-fired boilers the CAM indicator/monitoring parameters are the visible emissions from the boiler/ESP stack and the secondary voltage of the ESP's.

Condition 5.2.4 lists the indicator/monitoring parameter for the CAM monitoring for PM emissions from the Planer mill No. 1 and consists of the pressure drop across the planer mill cyclone.

Condition 5.2.5 lists the indicator/monitoring parameter for the CAM monitoring for PM emissions from the Reman mill No. 2 and consists of the pressure drop across the Reman mill cyclone.

Condition 5.2.6 specifies the boiler MACT monitoring parameters consisting of the oxygen level of the oxygen trim system for each boiler to ensure compliance with the boiler MACT CO emission limit, measurement of the steam production rate from Boilers B-1, B-2 and B-3, COMS for measuring the opacity of the boiler ESP stacks and measurement of secondary voltage (kilovolts) of each field of each ESPs BP-1, BP-2 and BP-3.

Condition 5.2.7 requires the Permittee to maintain the total secondary voltage for the dry ESP's BP-1, BP-2 and BP-3 equal to or greater than the minimum three hour average voltage established during the most recent performance test and maintenance of the total secondary current above zero when the unit is operating.

Condition 5.2.8 requires the Permittee to continuously monitor and record opacity of the dry ESPs in order to maintain the boiler ESP stack opacities to less than 10% (the boiler MACT opacity limit) or the highest hourly average opacity reading measured during the performance test demonstrating compliance with the PM emission limitation.

Condition 5.2.9 requires the Permittee to develop and submit to the Division for approval, before July 15, 2016, a site-specific monitoring plan that addresses design, data collection, and the quality assurance and quality control elements outlined in the boiler MACT.

Condition 5.2.10 requires the Permittee to maintain the 30-day rolling average operating load of each of the wood fired boilers B-1, B-2 and B-3 such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test.

Condition 5.2.11 requires the Permittee to install, calibrate, maintain, and operate a continuous monitoring system (CMS) to continuously monitor and record the boiler operating load (e.g., fuel consumption rate, steam generation rate, etc.) on each of the wood fired boilers B-1, B-2 and B-3.

Condition 5.2.12 requires the Permittee to develop and implement a written startup and shutdown plan (SSP) according to the requirements in Condition 3.3.6c.ii.

C. Compliance Assurance Monitoring (CAM)

CAM requirements for the Wood-fired Boilers (B-1, B-2, and B-3), including the ESPs controlling the boilers, the Planer Mill (PLM1), and the Reman Planer Mill (PLM2) at the Perry Mill have already been incorporated into the Permit and no new units with control devices have been added to the Perry Mill. Because the Drying Kilns (DK-1 – DK-5) and the In-plant Roads (INRD) do not utilize a control device, these units are not subject to CAM.

Condition 5.2.2 to 5.2.5 discussed above are the CAM conditions for PM for the Perry Lumber mill wood-fired boilers, Planer mill and the Reman mill.

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 6.2.1 requires the Permittee to retain boiler operation records including the hours of operation and the amount of wood-fired burned monthly in the boilers.

Condition 6.2.2 requires maintenance of all routine maintenance of all air pollution control equipment at the lumber mill.

Condition 6.2.3 requires the Permittee to maintain records of fugitive dust incidents at the facility.

Condition 6.2.4 requires the Permittee to submit all applicable notifications required by the boiler MACT.

Condition 6.2.5 requires the Permittee to maintain boiler records sufficient to demonstrate that the steam flow rate is no greater than 110 percent of the maximum demonstrated steam flow rate determined in accordance with Condition 4.2.3, in the most recent performance tests. The records include the maximum hourly steam flow for each hour, from each boiler, records of boiler operation above the maximum steam flow rate and description of any corrective actions taken.

Condition 6.2.6 is the boiler MACT deviation reporting condition.

Condition 6.2.7 requires the Permittee to maintain records of actions taken during periods of malfunction to minimize emissions including corrective actions taken per the boiler MACT requirements.

Condition 6.2.8 requires the Permittee to submit each report in Table 9 of the boiler MACT that is applicable to the Perry facility. The reports shall be submitted by the date specified in Table 9 of the boiler MACT.

Condition 6.2.9 is the recordkeeping requirements for the COMs required by the boiler MACT.

Condition 6.2.10 is the recordkeeping requirements for the wood-fired boilers per the boiler MACT.

Condition 6.2.11 requires the Permittee to maintain the boiler MACT records to be kept on site for the first two years and off-site for the next three years.

VII. Specific Requirements

A. Operational Flexibility

Not applicable.

B. Alternative Requirements

None.

C. Insignificant Activities

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

D. Temporary Sources

None.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

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

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

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

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

Addendum to Narrative