

# Part 70 Operating Permit Amendment

Permit Amendment No.: 2436-211-0013-V-03-1 Effective Date **DRAFT**

**Facility Name:** Georgia-Pacific Wood Products LLC (Madison, GA Plywood Facility)

**Facility Address:** 1400 Woodkraft Road  
Madison, Georgia 30650 Morgan County

**Mailing Address:** 1400 Woodkraft Road  
Madison, Georgia 30650

**Parent/Holding Company:** Georgia-Pacific Wood Products LLC

**Facility AIRS Number:** 04-13-211-00013

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 construction permit for:

Increase the production capacity of the existing plywood manufacturing plant.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

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 Permit Amendment and Permit No. 2436-211-0013-V-03-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit 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 Application No. 22349 dated December 20, 2013; any other applications upon which this Permit Amendment or Permit No. 2436-211-0013-V-03-0 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 Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **23** pages.

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

The Madison Plant proposes to conduct an expansion project to increase production to 10.6 million square feet (MMSF) (3/8" basis) per week according to the following phased construction schedule:

Phase I Project

Enclose debarker which is part of Source Group ID No. 100.

Remove from site the existing 24-Section Veneer Dryer #1 and associated cooling vents.

Add new 23-Section Veneer Dryer #1 and associated cooling vents. The dryer hot zones are to exhaust through the existing VOC control device with ID No. TCO.

Replace dryer tubes on the 20-section dryer ID No. 302

Add new glue line to Source Group ID No. 400.

Upgrade and automate existing glue line in Source Group ID No. 400.

Modify the boiler (Emission Unit ID No. 800) to handle the needed increase in steam load.

Upgrade the combustion air system (both overfired air and under grate air) and replace the sander dust and natural gas burners in the boiler (Emission Unit ID No. 800).

Upgrade existing presses in Source Group ID No. 400.

Modify dry waste transfer system PF2 by replacing trim saw (Emission Unit ID No. 501).

Add a backup dust collection system serving the glue line flying saw and core saw.

Upgrade Source Group ID No. 100 as described in Application No. 21468 (contemporaneous project).

Phase II Project

The existing 20-Section Veneer Dryer #2 and associated cooling vents is to be rebuilt as a 10-Section Veneer Dryer #2 and associated cooling vents. The dryer hot zones are to exhaust through the existing VOC control device with ID No. TCO. Georgia-Pacific may install a new 10-Section Veneer Dryer #2 and associated cooling vents instead of rebuilding the existing 20-Section Veneer Dryer #2 and associated cooling vents.

Add new 18-Section Veneer Dryer and associated cooling vents. The dryer hot zones are to exhaust through the existing VOC control device with ID No. TCO.

Remove from service the existing 16-Section Veneer Dryer #3 and associated cooling vents.

Remove from service the existing 10-section Veneer Dryer #4 and associated cooling vents.

Add new press to Source Group ID No. 400.

Modify dry waste transfer system PF2 adding a flying saw.

## Title V Permit Amendment

Georgia-Pacific Wood Products, LLC DRAFT

Permit No.: 2436-211-0013-V-03-1

### 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 Emission Units – Modified Permit Condition

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
100	Green Veneer Production	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.2, 6.2.24, 6.2.26, 6.2.40	WC1, WC2, or WC4	Cyclones
300	Veneer Dryers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 40 CFR 63 Subparts A and DDDD (the PCWP MACT) <b>40 CFR 52.21 for VOC emissions</b>	3.2.3, 3.2.4, 3.3.18, 3.3.19, 3.3.20, 3.3.21, 4.2.2, 4.2.3, 4.2.11, 4.2.12, 4.2.13, 6.1.8.b.iii, 6.1.8.b.iv, 6.1.8.d.v, 6.2.23, 6.2.25, 6.2.26, 6.2.27, 6.2.28, 6.2.29, 6.2.30, 6.2.38, 6.2.40, 6.2.42, 6.2.43, 6.2.44	TCO	Hybrid Thermal / Catalytic Oxidizer
400	Glue Line and Presses	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) <b>40 CFR 52.21 for VOC emissions</b>	3.3.22, 3.3.23, 3.3.24, 4.2.2, 4.2.3, 4.2.11, 4.2.12, 6.1.8.b.v, 6.1.8.b.vi, 6.1.8.b.vii, 6.1.8.d.vi, 6.1.8.d.vii, 6.2.24, 6.2.25, 6.2.26, 6.2.31, 6.2.32, 6.2.38, 6.2.40, 6.2.42, 6.2.43, 6.2.44	PF2, PC1, PC2	Cyclones
500	Finishing	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) <b>40 CFR 52.21 for VOC emissions</b>	6.2.25, 6.2.26, 6.2.40	PC1, PC2, PF1	Cyclones
600	Sander	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) <b>40 CFR 52.21 for VOC emissions</b>	6.2.25, 6.2.26, 6.2.40	PFB2	Baghouse
700	Specialty Saw/Sander	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) <b>40 CFR 52.21 for VOC emissions</b>	6.2.25, 6.2.26, 6.2.40	PC1, PC2, PF1, PFB1, PFB2	Cyclones, Baghouses
800	Boiler	391-3-1-.02(2)(d)2.(ii), (iii) 391-3-1-.02(2)(d)3. 391-3-1-.02(2)(g) 40 CFR 63 Subparts A and DDDDD (the Boiler MACT) <b>40 CFR 60 Subpart Db</b> <b>40 CFR 52.21 for VOC emissions</b> <b>Avoidance of 40 CFR 52.21 for NOx and CO</b>	3.2.5, 3.2.6, 3.3.11, 3.3.12, 3.3.13, 3.3.14, 3.3.15, 3.3.16, 3.3.17, 3.3.25, 4.2.1, 4.2.2, 4.2.3, 4.2.11, 4.2.12, 4.2.14, 4.2.15, 5.2.1, 5.2.3, 6.1.7.a.i, 6.1.8.a.i, 6.1.8.a.ii, 6.2.23, 6.2.25, 6.2.26, 6.2.33, 6.2.34, 6.2.35, 6.2.36, 6.2.37, 6.2.38, 6.2.39, 6.2.40, 6.2.41,	BC1, ESP1  SNCR1	Multiclone, Electrostatic Precipitator  Selective Non-Catalytic Reduction System
900	Plant Roads	391-3-1-.02(2)(n)	None	None	None
COAT	Panel Oiling/Edge Seal	391-3-1-.02(2)(n)	None	N/A	N/A

\* 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 Limits

#### NEW CONDITIONS

##### *Green Veneer Production*

- 3.2.2 The Permittee shall operate the debarker [Emission Unit ID No. 100] with an enclosure to control particulate matter emissions at all times of the debarker operation.  
[Avoidance of 40 CFR 52.21 for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions]

##### *Veneer Dryers*

- 3.2.3 For purposes of this Permit, Source Group ID No. 300 is comprised of the following existing veneer dryers and associated cooling vents:  
[391-3-1]
- a. Dryer #1: 24-Section dryer and associated cooling vents and assigned emission unit ID No. 301,
  - b. Dryer #2: 20-Section dryer and associated cooling vents and assigned emission unit ID No. 302,
  - c. Dryer #3: 16-Section dryer and associated cooling vents and assigned emission unit ID No. 303, and
  - d. Dryer #4: 10-Section dryer and associated cooling vents and assigned emission unit ID No. 304.
- 3.2.4 For purposes of this Permit, Source Group ID No. 300 will be revised as follows as part of Application No. 22349:  
[391-3-1]
- a. Emission Unit ID No. 301 or Existing Dryer #1: 24-Section dryer and associated cooling vents will be removed from the site as part of Phase I of the project,
  - b. Emission Unit ID No. 301 or New Dryer #1: 23-Section dryer and associated cooling vents will be constructed and operated as part of Phase I of the project.
  - c. Rebuilt Emission Unit ID No. 302 or Existing Dryer #2: The 20-Section dryer and associated cooling vents will be rebuilt or replaced as a 10-Section dryer as part of Phase II of the project,
  - d. Emission Unit ID No. 303 or Existing Dryer #3: The 16-Section dryer and associated cooling vents will be taken out of service within 180 days of initial startup of Emission Unit ID No. 302 and Emission Unit ID No. 303.
  - e. New Emission Unit ID No. 303 or New Dryer #3: 16-Section dryer and associated cooling vents will be constructed and operated as part of Phase II of the project,
  - f. Emission Unit ID No. 304 or Existing Dryer #4: 10-Section dryer and associated cooling vents will be taken out of service within 180 days of initial startup of Emission Unit ID No. 302 and Emission Unit ID No. 303.

**Boiler**

- 3.2.5 After completion of the modifications described by Application No. 22349 as they pertain to the boiler (Emission Unit ID No. 800), the Permittee shall not discharge or cause the discharge into the atmosphere from the boiler (Emission Unit ID No. 800) any gases which:
- a. Contain nitrogen oxides (NO<sub>x</sub>) emissions in amounts equal to or exceeding 161.9 tons during any twelve consecutive months, including periods of startup, shutdown, or malfunction.  
[Avoidance of 40 CFR 52.21 for NO<sub>x</sub> emissions]
  - b. Contain carbon monoxide (CO) emissions in amounts equal to or exceeding 2.05 pounds per million Btu heat input, based on a 3-hour average, excluding periods of startup or shutdown.  
[Avoidance of 40 CFR 52.21 for CO emissions]
- 3.2.6 The Permittee shall install a Selective Non-Catalytic Reduction System (Control Device ID: SNCR1) at the exhaust of the boiler (Emission Unit ID No. 800) if the Permittee finds they cannot comply with Condition 3.2.5.a. The Permittee shall operate Control Device SNCR1 at all times the boiler (Emission Unit ID No. 800) is operating except during periods of startup, shutdown, and malfunction; the SNCR will be operated as soon as practicable but no later than 7 hours after commencement of combustion of any fuel within the boiler.  
[Avoidance of 40 CFR 52.21 for NO<sub>x</sub> emissions]

**3.3 Equipment Federal Rule Standards****DELETED CONDITION**

- 3.3.1 Deleted.

**NEW CONDITIONS*****General Provisions for Prevention of Significant Deterioration***

- 3.3.9 The Permittee shall construct and operate the source or modification **as defined in Application No. 22349** that is subject to Georgia Rule 391-3-1-.02(7) in accordance with the application submitted pursuant to that rule. 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.  
[40 CFR 52.21(r)(1)]
- 3.3.10 Approval to construct **source or modification as defined in Application No. 22349** 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.  
[40 CFR 52.21(r)(2)]

**Boiler – NSPS Subpart Db**

- 3.3.11 After completion of the modifications described by Application No. 22349 as they pertain to the boiler (Emission Unit ID No. 800), the Permittee shall comply with all applicable provisions of 40 CFR 60, Subpart A, *General Provisions*, and Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* as they pertain to the boiler (Emission Unit ID No. 800).  
[40 CFR 60 Subparts A and Db]
- 3.3.12 After completion of the modifications described by Application No. 22349 as they pertain to the boiler (Emission Unit ID No. 800), the Permittee shall not discharge or cause the discharge into the atmosphere from the boiler any gases which:
- a. Contain filterable particulate matter (PM) emissions in amounts equal to or exceeding 0.085 lb/MMBtu, based on a 3-hour average, excluding periods of startup, shutdown, or malfunction.  
[40 CFR 60.43b(h)]
  - b. Exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.  
[40 CFR 60.43b(f)]
- 3.3.13 After completion of the modifications described by Application No. 22349 as they pertain to the boiler (Emission Unit ID No. 800), the Permittee shall limit operation of the boiler to an annual capacity factor of 10 percent or less for fossil fuels.  
[40 CFR 60.44b(c)]

**Boiler – NESHAP Subpart DDDDD**

- 3.3.14 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDD-“*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.*”  
[40 CFR 63, Subpart DDDDD]
- 3.3.15 The Permittee shall not discharge or cause the discharge into the atmosphere from the boiler (Emission Unit ID No. 800) carbon monoxide (CO) emissions in amounts equal to or exceeding 2,800 ppmvd at 3% oxygen on a 3-hour average or 900 ppmvd at 3% oxygen on a 30-day rolling average. The effective date of this Permit Condition is January 31, 2016.  
[40 CFR 63.7500(a)(1) No. 13 of Table 2 of 40 CFR 63 Subpart DDDDD]
- 3.3.16 The Permittee shall not discharge or cause the discharge into the atmosphere from the boiler (Emission Unit ID No. 800) filterable particulate matter in amounts equal to or exceeding 0.44 pounds per million Btu. The effective date of this Permit Condition is January 31, 2016.  
[40 CFR 63.7500(a)(1) No. 13 of Table 2 of 40 CFR 63 Subpart DDDDD]
- 3.3.17 The Permittee shall not discharge or cause the discharge into the atmosphere from the boiler (Emission Unit ID No. 800) visible emissions the opacity of which is equal to or exceeding 10 percent during any daily block average. The effective date of this Permit Condition is January 31, 2016.  
[40 CFR 63.7500(a)(1) No. 4 of Table 4 of 40 CFR 63 Subpart DDDDD]

***Veneer Dryers***

- 3.3.18 The Permittee shall install and operate, as Best Available Control Technology (BACT) for VOC emissions on the Veneer Dryer hot zones (Source Group ID No. 300), a hybrid regenerative thermal oxidizer/regenerative catalytic oxidizer (Source Code ID No. TCO) during all periods of operation. [40 CFR 52.21]
- 3.3.19 The Permittee shall, at all times except during periods of process unit or control device startup, shutdown, and malfunction, for the device (Source Code ID No. TCO) controlling emissions from Veneer Dryer hot zones (Source Group ID No. 300), achieve a minimum destruction efficiency for the captured total VOC emissions, measured as THC (as carbon), of 90 percent. Methane can be subtracted from THC measurement. [40 CFR 52.21]
- 3.3.20 The Permittee shall not discharge or cause the discharge into the atmosphere from the Veneer Dryer hot zones (Source Group ID No. 300) volatile organic compound (VOC) emissions in amounts equal to or exceeding 82.5 tons during any twelve consecutive months based on the wood products protocol (WPP1), including periods of startup, shutdown, and malfunction. [40 CFR 52.21]
- 3.3.21 The Permittee shall not discharge or cause the discharge into the atmosphere from the Veneer Dryer cooling zones (Source Group ID No. 300) volatile organic compound (VOC) emissions in amounts equal to or exceeding 21.9 tons during any twelve consecutive months based on the wood products protocol (WPP1), including periods of startup, shutdown, and malfunction. [40 CFR 52.21]

***Presses***

- 3.3.22 After completion of the modifications to the Presses (Source Group ID No. 400) as part of Phase I of the project, as described in Application No. 22349, the Permittee shall not discharge or cause the discharge into the atmosphere from the Presses (Emission Unit ID No. 403) VOC emissions in amounts equal to or exceeding 146.9 tons per year based on the wood products protocol (WPP1), including periods of startup, shutdown, and malfunction. [40 CFR 52.21]
- 3.3.23 After completion of the modifications to the Presses (Source Group ID No. 400) as part of Phase II of the project, as described in Application No. 22349, the Permittee shall not discharge or cause the discharge into the atmosphere from the Presses (Emission Unit ID No. 403) VOC emissions in amounts equal to or exceeding 242.6 tons per year based on the wood products protocol (WPP1), including periods of startup, shutdown, and malfunction. [40 CFR 52.21]

***Glue Lines***

- 3.3.24 After completion of the modifications to the Glue Lines in Source Group ID No. 400 as part of Phase I of the project, the Permittee shall not use VOC containing glues in the glue line (Emission Unit ID No. 400) which contains VOC in amounts equal to or exceeding 0.3 weight percent. [40 CFR 52.21]



***Boiler***

3.3.25 After completion of the modifications described by Application No. 22349 as they pertain to the boiler (Emission Unit ID No. 800), the Permittee shall not discharge or cause the discharge into the atmosphere from the boiler any gases which:

- a. Contain VOC emissions in amounts equal to or exceeding 0.023 pounds per million Btu heat input where VOC is measured as propane, excluding periods of startup and shutdown.  
[40 CFR 52.21]
- b. Contain VOC emissions in amounts equal to or exceeding 36.1 tons per year where VOC is measured as propane, including periods of startup, shutdown, and malfunction.  
[40 CFR 52.21]

**PART 4.0 REQUIREMENTS FOR TESTING****4.1 General Testing Requirements****MODIFIED CONDITION**

4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

- k. Method 7 or 7E for the determination of Nitrogen Oxides emissions.
- l. Method 10 for the determination of Carbon Monoxide emissions.
- m. Methods 201A, in conjunction with Method 202, for the determination of PM<sub>10</sub> and PM<sub>2.5</sub> emissions.
- n. Methods 25 or 25A for the determination of VOC emissions.
- o. The procedures of the NCASI Wood Products Protocol 1 shall be used to determine the VOC emissions from the veneer dryers and/or presses.
- p. Method 204 for the determination of a Temporary Total Enclosure.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

**NEW CONDITION**

4.1.4 The Permittee shall submit performance test reports to the US EPA's WebFIRE database in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements.

[391-3-1-.02)(8)(a) and 391-3-1-.02(9)(a)]

**4.2 Specific Testing Requirements****MODIFIED CONDITIONS**

4.2.1 The Permittee shall conduct a Particulate Matter performance test on the boiler (Emission Unit ID No. 800) at approximately 24-month intervals not to exceed 25 months between tests. The Permittee may, if the test results from the previous test is fifty percent or less of the limitation in 3.2.5.c and 3.4.1, request that testing be deferred for a period no greater than 48 months from the required test date. Such request shall be in written form at least thirty days prior to the scheduled test.

[391-3-1-.03(6)(b)1.(i)]

- 4.2.2 After completion of the modifications for Phase I of the project described by Application No. 22349, within 60 days after achieving the maximum operating rate at which the facility will be operated at, but no later than 180 days after initial startup of Phase I of the project, the Permittee shall conduct the following performance tests:

***Veneer Dryers***

- a. On the TCO, which control emissions from the hot zones of the Veneer Dryer (Source Group ID No. 300), to determine the destruction efficiency for VOC emissions of the TCO to verify compliance with Condition No. 3.3.19. During any test, the plant shall be operated in such a way that the dryer is operating as closely as possible to its maximum design.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- b. On the TCO, which control emissions from the hot zones of the Veneer Dryer (Source Group ID No. 300), to determine the VOC emissions in pounds per thousand square feet (3/8" basis). This emission factor will be used to verify compliance with Condition 3.3.19.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- c. On the cooling zones of New Dryer #1 (23-Section, Emission Unit ID No. 301) for filterable PM emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- d. On the cooling zones of New Dryer # 1 (23-Section, Emission Unit ID No. 301) for PM<sub>10</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- e. On the cooling zones of New Dryer #1 (23-Section, Emission Unit ID No. 301) for PM<sub>2.5</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- f. On the cooling zones of New Dryer #1 (23-Section, Emission Unit ID No. 301) for VOC emissions to verify compliance with Condition No. 3.3.20.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]

***Boiler***

- g. On the boiler (Emission Unit ID No. 800) for VOC emissions, as propane to verify compliance with Permit Condition No. 3.3.25;  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21 for VOC emissions]
- h. On the boiler (Emission Unit ID No. 800) for CO emissions to verify compliance with Permit Condition No. 3.2.5.b;  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and Avoidance of 40 CFR 52.21 for CO emissions]
- i. On the boiler (Emission Unit ID No. 800) for PM emissions to verify compliance with Permit Condition Nos. 3.3.12, and 3.4.1;  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), 40 CFR 60.46b(d) for filterable PM, 391-3-1-.02(2)(d) for total PM]

- j. On the boiler (Emission Unit ID No. 800) for visible emissions to verify compliance with Permit Condition Nos. 3.3.12.b and 3.4.2.  
[391-3-1-.02(6)(b)1.(i), 391-3-1-.02(2)(d), 40 CFR 70.6(a)(3)(i) and 40 CFR 60.46b(d)]

***Presses***

- k. On the Presses (Source Group: 403) for filterable PM emissions. The test plan should establish provisions for determination of capture efficiency.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
  - l. On the Presses (Source Group: 403) for PM<sub>10</sub> emissions. The test plan should establish provisions for determination of capture efficiency.
  - m. [391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
  - n. On the Presses (Source Group: 403) for PM<sub>2.5</sub> emissions. The test plan should establish provisions for determination of capture efficiency.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
  - o. On the Presses for VOC emissions in lb per thousand square feet (3/8" basis). The test plan should establish provisions for determination of capture efficiency. This determined emission factor shall be used to calculate VOC emissions from the presses as described in Condition Nos. 6.2.31 and 6.2.32.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- 4.2.3 Should the dryer production rate or the steam production rate increase by ten (10) percent or more on a 90 day average basis above the rate at which the acceptable performance test was carried out, as required by Condition No. 4.2.2, the Permittee shall conduct all of the performance tests required by Condition No. 4.2.2 within 180 days.  
[391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(i)]

**NEW CONDITIONS**

- 4.2.11 After completion of the modifications for Phase II of the project described by Application No. 22349, within 60 days after achieving the maximum operating rate at which the facility will be operated at, but no later than 180 days after initial startup of Phase II of the project, the Permittee shall conduct the following performance tests:

***Veneer Dryers***

- a. On the TCO, which control emissions from the hot zones of the Veneer Dryer (Source Group ID No. 300), to determine the destruction efficiency for VOC emissions of the TCO to verify compliance with Condition No. 3.3.19. During any test, the plant shall be operated in such a way that the dryer is operating as closely as possible to its maximum design.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- b. On the TCO, which control emissions from the hot zones of the Veneer Dryer (Source Group ID No. 300), to determine the VOC emissions in pounds per thousand square feet (3/8" basis). This emission factor will be used to verify compliance with Condition 3.3.20.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- c. On the cooling zones of Rebuilt or New Dryer #2 (20-Section, Emission Unit ID No. 302) for filterable PM emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]

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- d. On the cooling zones of Rebuilt or New Dryer #2 (10-Section, Emission Unit ID No. 302) for PM<sub>10</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- e. On the cooling zones of Rebuilt or New Dryer #2 (10-Section, Emission Unit ID No. 302) for PM<sub>2.5</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- f. On the cooling zones of Rebuilt or New Dryer #2 (10-Section, Emission Unit ID No. 302) for VOC emissions to verify compliance with Condition No. 3.3.20.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]
- g. On the cooling zones of New Dryer #3 (18-Section, Emission Unit ID No. 303) for filterable PM emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- h. On the cooling zones of New Dryer #3 (18-Section, Emission Unit ID No. 303) for PM<sub>10</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- i. On the cooling zones of New Dryer #3 (18-Section, Emission Unit ID No. 303) for PM<sub>2.5</sub> emissions.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- j. On the cooling zones of New Dryer #3 (18-Section, Emission Unit ID No. 303) for VOC emissions to verify compliance with Condition No. 3.3.20.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]

### ***Presses***

- p. On the Presses (Source Group: 403) for PM emissions. The test plan should establish provisions for determination of capture efficiency.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- q. On the Presses (Source Group: 403) for PM<sub>10</sub> emissions. The test plan should establish provisions for determination of capture efficiency.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- r. On the Presses (Source Group: 403) for PM<sub>2.5</sub> emissions. The test plan should establish provisions for determination of capture efficiency.  
[391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i)]
- s. On the Presses (Source Group ID No. 403) for VOC emissions in lb per thousand square feet (3/8" basis). The test plan should establish provisions for determination of capture efficiency. This determined emission factor shall be used to calculate VOC emissions from the presses as described in Condition Nos. 6.2.31 and 6.2.32.  
k. [391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]

- 4.2.12 Should the 180 day average dryer production rate or the steam production rate increase by ten (10) percent or more above the rate at which the acceptable performance test was carried out, as required by Condition No. 4.2.11, the Permittee shall conduct all of the performance tests required by Condition No. 4.2.11 for all equipment that exceeded the 10% threshold.  
[391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(i)]

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- 4.2.13 Upon completion of the test required by Condition No. 4.2.2.a the Permittee shall conduct a performance test on the TCO at least once every two years, to determine the destruction efficiency for VOC emissions of the TCO to verify compliance with Condition Nos. 3.2.1 and 3.3.18 for the operation of the hot zones of all veneer dryers on-site. During any test, the plant shall be operated in such a way that each dryer is operating as closely as possible to its maximum design. [391-3-1-.02(6)(b)1.(i), 40 CFR 70.6(a)(3)(i), and 40 CFR 52.21]

### ***Boiler***

- 4.2.14 Within 180 days after initial startup of the boiler (Emission Unit ID No. 800), the Permittee shall conduct performance evaluations of the continuous emissions monitoring systems (CEMS) required by Condition No. 5.2.1.b. The NO<sub>x</sub> CEMS required by Condition No. 5.2.1.b shall be used for determining compliance with Condition No. 3.2.8.a. [391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(i)]
- 4.2.15 The Permittee shall determine the heat content of the green and dry wood residual, on a combined basis, (Fuel F factor) during the initial performance test of the modified boiler (Emission Unit ID No. 800) and annually thereafter. The heat content (Fuel F factor) shall also be redetermined if there is a change in fuels for the boiler (Source Code: 800). [391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(i)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.2 Specific Monitoring Requirements****MODIFIED CONDITIONS**

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
- a. Opacity from the boiler with Emission Unit ID No. 800.  
[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i), and 40 CFR 60.48b(a)]
  - b. The Permittee shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for the measurement of nitrogen oxides (NO<sub>x</sub>) emissions from the boiler (Emission Unit ID No. 800). The NO<sub>x</sub> emission rate shall be recorded in pounds per million Btu heat input. The CEMS will be part of the official compliance determination method for NO<sub>x</sub> emissions from the boiler.  
[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i)]
  - c. The Permittee shall, using the procedures of Appendix F, Procedure 1 (Quality Assurance Requirements for Gas Continuous Emissions Monitoring Systems Used for Compliance Determination) contained in the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**, assess the quality and accuracy of the data acquired by the CEMS required by Condition 5.2.1.b.
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-.02(6)(b)1. And 40 CFR 70.6(a)(3)(i)]
- c. The amount and type of fuel combusted in the boiler (Source Code: 800). The Permittee shall submit for the Division's review and approval the procedure proposed to monitor fuel usage within 60 days of the issuance of this Permit. The Permittee shall monitor and record the amount of fuel including fuel type combusted daily.

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

6.1.7 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)
  - i. Any six-minute period during which the average opacity, as measured by the continuous opacity monitoring system (COMS) for the boiler (Emission Unit ID No. 800), that is greater than or equal to 20 percent, except for one six minute average per hour of not more than 27 percent opacity.  
[40 CFR 60.49b(f) upon initial startup of modified boiler]
- 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)

***Boiler***

- ii. Any twelve consecutive month total NO<sub>x</sub> emissions from the boiler (Emission Unit ID No. 800) which equals or exceeds 161.9 tons, including periods of startup, shutdown, and malfunction.  
[Avoidance of 40 CFR 52.21 for NO<sub>x</sub> emissions]
- iii. Any twelve consecutive month total VOC emissions from the boiler (Emission Unit ID No. 800) which equals or exceeds 36.1 tons, including periods of startup, shutdown and malfunction. This Permit Condition becomes effective upon initial startup of the New Dryer #1 (Emission Unit ID No. 301) as part of Phase I of the project.  
[40 CFR 52.21 for VOC emissions]

***Veneer Dryers***

- iv. Any twelve consecutive month total VOC emissions from the Veneer Dryer hot zones (Source Group ID No. 300) which equals or exceeds 82.5 tons, including periods of startup, shutdown and malfunction.  
[40 CFR 52.21 for VOC emissions]
- v. Any twelve consecutive month total VOC emissions from the Veneer Dryer cooling zones (Source Group ID No. 300) which equals or exceeds 21.9 tons, including periods of startup, shutdown and malfunction.  
[40 CFR 52.21 for VOC emissions]



***Presses and Glue Lines***

- vi. Any twelve consecutive month total VOC emissions from the Presses (Source Group ID No. 400) which equals or exceeds 146.9 tons, including periods of startup, shutdown and malfunction. This condition does not apply upon initial startup of Phase II of the project. [40 CFR 52.21 for VOC emissions]
  - vii. Any twelve consecutive month total VOC emissions from the Presses (Source Group ID No. 400) which equals or exceeds 242.6 tons, including periods of startup, shutdown and malfunction. [40 CFR 52.21 for VOC emissions]
  - viii. Any time the Permittee uses a glue in the glue lines (Source Group ID No. 400) which contains VOC in amounts equal to or exceeding 0.3 weight percent. [40 CFR 52.21 for VOC emissions]
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

***Boiler***

- i. A twelve consecutive month total VOC emissions (in tons) from the boiler (Emission Unit ID No. 800) for each month during the reporting period.
- ii. The annual capacity factor for the boiler (Emission Unit ID No. 800) as calculated in Condition No. 6.2.33 for each month during the reporting period.
- iii. A twelve consecutive month total NOx emissions (in tons) from the boiler (Emission Unit ID No. 800) as calculated in Condition No. 6.2.36 for each month during the reporting period.

***Veneer Dryers***

- iv. A twelve consecutive month total VOC emissions (in tons) from the hot zones in Veneer Dryer Group ID No. 300 for each month during the reporting period.
- v. A twelve consecutive month total VOC emissions (in tons) from the cooling zones in Veneer Dryer Group ID No. 300 for each month during the reporting period.

***Presses and Glueline***

- vi. The Permittee shall certify with a written statement that each glue used in the Glue Lines (Source Group ID No. 400) complies with the limitation specified in Permit Condition No. 3.3.23.
- vii. A twelve consecutive month total VOC emissions (in tons) from the presses in Source Group ID No. 400 for each month during the reporting period.

## 6.2 Specific Record Keeping and Reporting Requirements

### NEW CONDITIONS

#### *Recordkeeping Requirements*

- 6.2.23 The Permittee shall retain the following records (including calculations) as part of the monthly record suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- a. Monthly amount of plywood processed by the facility in million square feet of plywood on a 3/8" basis; and
- 6.2.24 The Permittee shall maintain records of all VOC containing products used in the Glue Lines (Source Group ID No. 400) which specifies the percent VOC by weight of each VOC containing product.  
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.25 The Permittee shall determine and record the rolling twelve month total emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, VOC, SO<sub>2</sub>, and GHGs (expressed as CO<sub>2</sub>e), on a monthly basis for each of the following Source Groups or Emission Unit ID Nos. 100, 300, 400, 500, 600, 700, and 800 in accordance with Georgia Rule 391-3-1-.02(7)(b)15.(i)(III). The Permittee shall perform these calculations for a period of 10 years after project implementation.
- 6.2.26 The Permittee shall calculate the actual increase in emissions due to demand growth, in tons per year, on a calendar basis, for a period of 10 years for the following emission units: log trimmer system, bark hog/fuel house, whole log chippers, core chippers, and veneer chippers, shaker screen overs and rechippers, chip conveying system, chip loading truck, and chip loading railcar. The pollutants covered by this Condition include PM, PM<sub>10</sub>, and PM<sub>2.5</sub>. These records shall be retained for a period of five years past the end of each calendar quarter.  
[391-3-1-.02(7)(b)15.(i)(III) and (IV)]

#### *Verification of Compliance with VOC Emission Limit-Hot Zones of Veneer Dryers*

- 6.2.27 The Permittee shall use the records required by Condition No. 6.2.23 to determine and record the monthly mass emission rate, in tons per month, of VOC, from the hot zones of Veneer Dryer Source Group ID No. 300. For purposes of this permit condition, the VOC (WPP1) emissions shall be estimated using an emission factor of 2.99 lb/Msf (3/8" basis) or the most recent Division approved source test, whichever is lower. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.28 The Permittee shall use the records required by Condition No. 6.2.27 to determine and record the twelve consecutive month total VOC (WPP1) emissions (in tons) from the hot zones of the Veneer Dryers (Source Group ID No. 300). A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

***Verification of Compliance with VOC Emission Limit-Cooling Zones of Veneer Dryers***

- 6.2.29 The Permittee shall use the records required by Condition No. 6.2.23 to determine and record the monthly mass emission rate, in tons per month, of VOC (WPP1), from the cooling zones of the Veneer Dryers (Source Group ID No. 300). For purposes of this permit condition, the VOC (WPP1) emissions shall be estimated using an emission factor of 0.080 lb/Msf (3/8" basis) or the most recent Division approved source test, whichever is lower. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.30 The Permittee shall use the records required by Condition No. 6.2.29 to determine and record the twelve consecutive month total VOC (WPP1) emissions (in tons) from the cooling zones of the Veneer Dryers (Source Group ID No. 300). A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

***Verification of Compliance with VOC Emission Limit-Presses***

- 6.2.31 The Permittee shall use the records required by Condition No. 6.2.23 to determine and record the monthly mass emission rate, in tons per month, of VOC (WPP1) from the Presses (Source Group ID No. 400). For purposes of this permit condition, the VOC (WPP1) emissions shall be estimated using an emission factor of 0.88 lb/Msf (3/8" basis) or the most recent Division approved source test, whichever is lower. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.32 The Permittee shall use the records required by Condition No. 6.2.31 to determine and record the twelve consecutive month total VOC (WPP1) emissions (in tons) from the Presses (Source Group ID No. 400). A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

***Verification of Compliance with VOC Emission Limit-Boiler***

- 6.2.33 The Permittee shall use the records required by Condition No. 6.2.23 to determine and record the monthly mass emission rate, in tons per month, of VOC, from the boiler with Emission Unit ID No. 800. For purposes of this permit condition, the VOC emissions from biomass combustion shall be estimated using an emission factor of 0.023 lb/MMBtu (as propane) or the most recent Division approved source test, whichever is lower. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.34 The Permittee shall use the records required by Condition No. 6.2.33 to determine and record the twelve consecutive month total VOC emissions (in tons) from the boiler with Emission Unit ID No. 800. A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal. [40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

***Verification of Compliance with NOx Emission Limit-Boiler***

- 6.2.35 The Permittee shall use the data from the CEMS required by Condition No. 5.2.1.b, to determine and record the monthly mass emission rate, in tons per month, of NOx emissions from the boiler (Emission Unit ID No. 800). These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[40 CFR 52.21 Avoidance for NOx Emissions, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- 6.2.36 The Permittee shall use the records required by Condition No. 6.2.35 to determine and record the twelve consecutive month total NOx emissions (in tons) from the boiler with Emission Unit ID No. 800. A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.  
[40 CFR 52.21 Avoidance for NOx Emissions, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

***Boiler – NSPS Db***

- 6.2.37 The Permittee shall record and maintain records of the amounts of fuel combusted during each day for the boiler (Emission Unit ID No. 800) and calculate the annual capacity factor. The annual capacity factor is determined on a twelve-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Records of the calculations shall be maintained in a form suitable for inspection by, or submittal, to the Division.  
[40 CFR 60.41b(a) and 40 CFR 60.49b(d)(1)]

***Reporting***

- 6.2.38 The Permittee shall furnish the Division written notification as follows:  
[40 CFR 52.21, 391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
- a. A notification of the actual date of initial startup of New Dryer #1 and associated cooling vents (Emission Unit ID No. 301) within 15 days of startup.
  - b. A notification of the actual date of initial startup of Rebuilt or New Dryer #2 and associated cooling vents (Emission Unit ID No. 302) within 15 days of startup.
  - c. A notification of the actual date of initial startup of New Dryer #3 and associated cooling vents (Emission Unit ID No. 303) within 15 days of startup.
  - d. A notification of the actual date Existing Dryer #1 (Emission Unit ID No. 301) is dismantled within 15 days of dismantling.
  - e. A notification of the actual date Existing Dryer #3 (Emission Unit ID No. 303) is dismantled within 15 days of dismantling.
  - f. A notification of the actual date Existing Dryer #4 (Emission Unit ID No. 304) is dismantled within 15 days of dismantling.
  - g. A notification of the actual date of initial startup of the boiler (Emission Unit ID No. 800) upon the incorporation of the physical changes noted in Application No. 22349 as they relate to this boiler within 15 days of startup.
  - h. A notification of the actual date of initial startup of the Press Source Group ID No. 400 upon completion of the Press component of Phase I of the project as defined in Application No. 22349 within 15 days of startup.

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- i. A notification of the actual date of initial startup of the new press that is part of Press Source Group ID No. 400 within 15 days of startup (part of Phase II of project).
  - j. A notification of the actual date of initial startup of the Glue Lines in Source Group ID No. 400 upon completion of the glue lines component of Phase I of the project as defined in Application No. 22349 within 15 days of startup.
  - k. Certification that a final inspection has shown that construction of each unit specified in Condition 1.3 as part of Phase I of the project has been completed in accordance with the application, plans, specifications and supporting documents submitted in support of this permit. The certification shall be submitted within 30 days of the date of certification.
  - l. Certification that a final inspection has shown that construction of each unit specified in Condition 1.3 as part of Phase II of the project has been completed in accordance with the application, plans, specifications and supporting documents submitted in support of this permit. The certification shall be submitted within 30 days of the date of certification.
- 6.2.39 No later than July 30, 2015, the Permittee shall submit a compliance plan to demonstrate initial and continuous compliance with the emission limitations, fuel specification, and work practice standards for 40 CFR 63 Subpart DDDDD for the boiler (Emission Unit ID No. 800).  
[40 CFR 63 Subpart DDDDD]
- 6.2.40 The Permittee shall submit a report to the Division within 60 days after the end of each calendar year for a period of ten years after project implementation, of the data required by Condition No. 6.2.26.  
[391-3-1-.02(7)(b)15.(i)(III) and (IV)]
- 6.2.41 The Permittee shall submit a written response to the Division within 60 days of the initial performance test for NO<sub>x</sub> emissions from the boiler (Emission Unit ID No. 800) as to whether the Permittee will install and operate a selective catalytic reduction system (SNCR) on the boiler. If the Permittee chooses to install and operate an SNCR, the written response shall provide an anticipated date of installation and operation.  
[Avoidance of 40 CFR 52.21 for NO<sub>x</sub> emissions]
- 6.2.42 The Permittee shall submit a PSD applicability netting analysis for both Phases I and Phase I and II for filterable PM if all of the following criteria are met:  
[To verify PSD Avoidance for filterable PM]
- a. The tested emission rate for filterable PM from New Dryer #1 cooling zones is greater than 0.023 lb/Msf (3/8" basis).
  - b. The tested emission rate for filterable PM from the presses (Source Group ID No. 400) is greater than 0.0089 lb/Msf (3/8" basis).

The netting analyses shall be submitted within 60 days of the Division's approval of the applicable tests specified in Condition No. 4.2.2.

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6.2.43 The Permittee shall submit a PSD applicability netting analysis for both Phases I and Phase I and II for PM<sub>10</sub> if all of the following criteria are met:  
[To verify PSD Avoidance for filterable PM]

- a. The tested emission rate for PM<sub>10</sub> from New Dryer #1 cooling zones is greater than 0.023 lb/Msf (3/8" basis).
- b. The tested emission rate for PM<sub>10</sub> from the presses (Source Group ID No. 400) is greater than 0.0038 lb/Msf (3/8" basis).

The netting analyses shall be submitted within 60 days of the Division's approval of the applicable tests specified in Condition No. 4.2.2.

6.2.44 The Permittee shall submit a PSD applicability netting analysis for both Phases I and Phase I and II for PM<sub>2.5</sub> if all of the following criteria are met:  
[To verify PSD Avoidance for filterable PM]

- a. The tested emission rate for PM<sub>2.5</sub> from New Dryer #1 cooling zones is greater than 0.023 lb/Msf (3/8" basis).
- b. The tested emission rate for PM<sub>10</sub> from the presses (Source Group ID No. 400) is greater than 0.0027 lb/Msf (3/8" basis).

The netting analyses shall be submitted within 60 days of the Division's approval of the applicable tests specified in Condition No. 4.2.2.

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.1 Operational Flexibility Associated with this Amendment**

Not Applicable.

**7.2 Off-Permit Changes Associated with this Amendment**

Not Applicable.

**7.3 Alternative Requirements Associated with this Amendment**

[White Paper #2]

Not Applicable.

**7.4 Insignificant Activities Associated with this Amendment**

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

**7.5 Temporary Sources Associated with this Amendment**

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not Applicable.

**7.6 Short-term Activities Associated with this Amendment**

(see Form D5 “Short Term Activities” of the Permit application and White Paper #1)

Not Applicable.

**7.7 Compliance Schedule/Progress Reports Associated with this Amendment**

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

None applicable.

**7.8 Emissions Trading Associated with this Amendment**

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable.

**7.9 Acid Rain Requirements Associated with this Amendment**

Not Applicable.

**7.12 Revocation of Existing Permits and Amendments**

Not Applicable.

**7.13 Pollution Prevention Associated with this Amendment**

Not Applicable.

## Title V Permit Amendment

### 7.14 Specific Conditions Associated with this Amendment

- 7.14.1 After completion of the modifications described by Application No. 22349, the following conditions shall become effective immediate upon startup of each emission unit:

Part 3.0	Part 4.0	Part 5.0	Part 6.0
3.2.2	4.2.2	5.2.1	6.1.7.b.ii
3.3.11	4.2.3	5.2.9	6.1.7.b.iii
3.3.12	4.2.14	5.2.18	6.1.7.b.vii
3.3.13	4.2.15	5.2.19	6.1.7.d.i
3.3.23			6.1.7.d.ii
3.3.24			6.1.7.d.iii
3.3.25			6.1.7.d.vi
			6.2.31
			6.2.32
			6.2.33
			6.2.34
			6.2.35
			6.2.36
			6.2.37

- 7.14.2 The following conditions shall become effective immediate upon startup of New Dryer #1 (Emission Unit ID No. 301) as part of Phase I of the project.

Part 3.0	Part 4.0	Part 5.0	Part 6.0
3.2.5	4.2.13	NA	6.1.7.b.iv
3.3.18			6.1.7.b.v
3.3.19			6.1.7.d.iv
3.3.20			6.1.7.d.v
3.3.21			6.2.23
			6.2.24
			6.2.25
			6.2.27
			6.2.28
			6.2.29
			6.2.30

- 7.14.3 The following conditions shall become effective immediate upon startup of any emissions unit which is new or modified as part of Phase II of the project.

Part 3.0	Part 4.0	Part 5.0	Part 6.0
3.3.22	4.2.11 4.2.12	NA	6.1.7.b.vi

- 7.14.4 Condition No. 3.2.6 shall become effective within 180 days of the Permittee's notification to the Division that the installation and operation of an SNCR to control NOx emissions is necessary for compliance with Condition No. 3.2.5.a.



**Attachments**

A. List of Standard Abbreviations and List of Permit Specific Abbreviations

DRAFT

## List Of Standard Abbreviations

AIRS	Aerometric Information Retrieval System
APCD	Air Pollution Control Device
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BTU	British Thermal Unit
CAAA	Clean Air Act Amendments
CEMS	Continuous Emission Monitoring System
CERMS	Continuous Emission Rate Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System(s)
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic Meter
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act
gr	Grain(s)
GPM (gpm)	Gallons per minute
H <sub>2</sub> O (H <sub>2</sub> O)	Water
HAP	Hazardous Air Pollutant
HCFC	Hydro-chloro-fluorocarbon
MACT	Maximum Achievable Control Technology
MMBtu	Million British Thermal Units
MMBtu/hr	Million British Thermal Units per hour
MVAC	Motor Vehicle Air Conditioner
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub> (NO <sub>x</sub> )	Nitrogen Oxides
NSPS	New Source Performance Standards
OCGA	Official Code of Georgia Annotated

[illegible]

## List of Permit Specific Abbreviations

