

Part 70 Operating Permit Amendment

Permit Amendment No.: 2421-115-0016-V-04-1

Effective Date: October 28, 2015

Facility Name: Georgia-Pacific Wood Products South LLC –Lumber Plant

380 Mays Bridge Road
Rome, Georgia 30162 (Floyd County)

Mailing Address: 133 Peachtree St., NE
Atlanta, GA 30303-1808

Parent/Holding Company: Georgia-Pacific Building Products, LLC

Facility AIRS Number: 04-13-115-00016

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 and operating permit for:

Construction and operation of a continuous direct-fired lumber kiln with a sawdust gasifier (ID No. CDK), fuel silo and associated equipment

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. 2421-115-0016-V-04-0. 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. 40038 dated March 6, 2015; any other applications upon which this Permit Amendment or Permit No. 2421-115-0016-V-04-0 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 11 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2421-115-0016-V-04-0.

[Signed]

Director
Environmental Protection Division

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

Georgia-Pacific Wood Products South LLC – Lumber Plant is proposing to construct and operate a 125 MMBF/yr continuous direct-fired lumber kiln with a 35 MMBtu/hr sawdust gasifier, fuel silo and associated equipment and the replacement of the stacker. The proposed project will increase the production limit from 220 to 345 MMBF/yr. The increased lumber drying capacity for the facility will result in more material processed therefore an increase in emissions from existing equipment. The existing equipment will be capable of accommodating the increase in lumber production from the expansion without any additional modifications.

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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
CDK	Lumber Drying Kiln (continuous direct-fired)	40 CFR 52.21 PSD/BACT 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.2.3, 3.2.6, 3.3.1, 3.3.2, 3.3.5, 3.3.6, 3.4.1, 3.4.3, 3.4.6, 6.1.7, 6.2.2, 6.2.3, 6.2.4, 6.2.7, 6.2.8, 6.2.9	N/A	None
SFS	Sawdust Fuel Silo	391-3-1-.02(2)(n)	3.2.4, 3.4.4, 3.4.5, 5.2.2	SFSCY	Cyclone

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

NEW CONDITION

3.2.3 The Permittee shall not dry more than 125 million board feet of lumber during any twelve consecutive months in Lumber Drying Kiln (ID No. CDK). If required, the VOC emissions from Lumber Drying Kiln (ID No. CDK) shall be estimated using an emission factor of 5.49 pounds per thousand board feet of lumber dried (WPP1).
[PSD/BACT, 40 CFR 52.21]

NEW CONDITION

3.2.4 The Permittee shall operate the cyclone (ID No. SFSCY) for the Sawdust Fuel Silo (ID No. SFS) at all times the Sawdust Fuel Silo is in operation.
[391-3-1-.02(2)(a)]

NEW CONDITION

3.2.5 If the Planer Mill (ID No. PM) exceeds 6,000 hours of operation during any twelve consecutive months, the Permittee shall calculate the twelve month rolling total emissions increase for the kiln project and compare to the PSD permitting thresholds. The project increases shall not exceed the respective significant emissions rates (SER) for each pollutant. This limit shall apply for five years after the startup of the Lumber Drying Kiln (ID No. CDK).
[PSD/BACT, 40 CFR 52.21]

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NEW CONDITION

3.2.6 The Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for the Lumber Drying Kilns (LDK1, LDK2, LDK3 and CDK) to assure that the provisions of Condition 8.17.1 are met. 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. The lumber kiln drying operation target final moisture content will be 12% or greater based on a 12-month rolling average. Moisture content of the lumber will be measured with a moisture meter at the infeed of the planer mill.
- ii. The lumber kiln shall be operated following a wet bulb temperature set-point-drying schedule of 240°F or lower for Lumber Drying Kilns LDK1, LDK2, and LDK3 only.
- iii. Routines for periodic preventative maintenance are detailed in paragraphs b, c, d, e, and f of this condition. With future equipment changes or modifications, these preventative maintenance activities can be modified pending approval from EPD.

b. Daily Routine:

- i. Make certain all fans are running properly. If one “trips out” frequently or becomes inoperable, investigate to determine the reason and then document corrective actions.
- ii. Check to verify that the kiln heating systems (steam and direct-fired gasifier) is operating properly.

c. Six Week Routine:

- i. Grease fan motors, shafts and bearings, inspect fan blades for damage. Check fan clearances and rotation. Tension and replace belts if required.
- ii. Inspect kiln walls, doors and baffles for deterioration and schedule repairs as needed.
- iii. Inspect temperature monitoring systems for proper operation.
- iv. Inspect vents and linkages (for Lumber Drying Kilns LDK1, LDK2, and LDK3 only). Schedule repairs as needed.
- v. Grease vent shafts on vents in internal linkages (for Lumber Drying Kilns LDK1, LDK2, and LDK3 only).

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- vi. If necessary, sweep out kiln to remove accumulated dust (for Lumber Drying Kilns LDK1, LDK2, and LDK3 only).
 - vii. Inspect and repair as necessary external components of direct-fired gasifier.
 - viii. Inspect wet bulb socks and replace as needed. Replace a sock daily if it has a tendency to become hard. Check water flow to the wet bulb. (Lumber Drying Kilns LDK1, LDK2 and LDK3 only).
- d. Semi-annual Routine:
- i. Verify accuracy of the temperature measurement systems. Repair or replace components as necessary.
 - ii. Inspect steam supply main and headers for steam leaks and insulation deficiencies. Repair as needed. Inspect steam traps for proper operation and replace/repair as needed. Stroke all steam valves. (for Lumber Drying Kilns LDK1, LDK2, and LDK3 only)
 - iii. During cold shutdown of CDK, inspect and repair as necessary all internal components of kiln and direct-fired gasifier. During this time the Lumber Drying Kiln CDK and burner should be thoroughly cleaned of accumulated dust.
- e. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record problems discovered in a maintenance logs/checklists or the plant's Computerized Maintenance Management System (CMMS), indicating the corrective action(s) taken. If a problem discovered during daily inspection cannot be remedied within 48 hours of discovery, it shall be entered into the plant's Computerized Maintenance Management System (CMMS) as an excursion. If a problem discovered during other inspections cannot be remedied within 7 days of discovery, it shall be entered into the plant's Computerized Maintenance Management System (CMMS) as an excursion.

3.3 Equipment Federal Rule Standards

MODIFIED CONDITION

- 3.3.2 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” as they apply to the lumber drying kilns (ID Nos. LDK1, LDK2, and LDK3) and Lumber Drying Kiln (ID No. CDK).
[40 CFR 63, Subpart DDDD]

NEW CONDITION

- 3.3.5 The Permittee shall construct and operate the source or modification as defined in Application No. 40038 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)]

NEW CONDITION

- 3.3.6 Approval to construct source of modification as defined in Application No. 40038 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)]

3.4 Equipment SIP Rule Standards

MODIFIED CONDITION

- 3.4.1 The Permittee shall not cause, let, suffer, permit, or allow the emission from the indirect-fired drying kilns (ID Nos. LDK1, LDK2, and LDK3) and Lumber Drying Kiln (ID No. CDK), particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)1. and 2.]

- a. For equipment in operation or extensively altered **after** July 2, 1968:
- i. $E = 4.1P^{0.67}$, for process input weight rate up to and including 30 tons per hour;
 - ii. $E = 55P^{0.11} - 40$, for process input weight rate in excess of 30 tons per hour.

Where:

E = allowable emission rate in pounds per hour;

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P = process input weight rate in tons per hour.

MODIFIED CONDITION

- 3.4.3 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the indirect-fired drying kilns (ID Nos. LDK1, LDK2, and LDK3), Planer Mill (ID No. PM) and Lumber Drying Kiln (ID No. CDK), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.
[391-3-1-.02(2)(b)]

MODIFIED CONDITION

- 3.4.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the plant roads and the Sawdust Fuel Silo (ID No. SFS) any fugitive dust which exhibits opacity equal to or greater than 20 percent.
[391-3-1-.02(2)(n)]

MODIFIED CONDITION

- 3.4.5 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
 - d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
 - e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

NEW CONDITION

- 3.4.6 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source for the Lumber Drying Kiln (ID No. CDK) unless otherwise specified by the Director.
[391-3-1-.02(2)(g)2]

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:

- h. The procedures of NCASI Wood Products Protocol 1 shall be used to determine VOC concentration from the Lumber Drying Kilns.

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)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

MODIFIED CONDITION

5.2.2 The Permittee shall perform the following applicable operation and maintenance checks for the cyclones (ID Nos. PMC and SFSCY) and retain a record suitable for inspection or submittal for each week or portion of each week of operation of the Planer Mill and the Sawdust Fuel Silo controlled by cyclones. A checklist or other similar log may be used for this purpose:

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

- a. Check exterior for holes in the body or evidence of malfunction in interior of the cyclone.
- b. Check hopper for bridging and plugging.
- c. Check particulate transfer device for proper operation to ensure dust removal.

Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken.

DELETED CONDITION

5.2.5 [Deleted]

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)(iii)]

- 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)

MODIFIED CONDITION

- i. Any 12-consecutive month total of lumber dried in Lumber Drying Kilns LDK1, LDK2 and LDK3 that is greater than 220 million board feet. [PSD/BACT, 40 CFR 52.21]

NEW CONDITION

- ii. Any 12-consecutive month total of lumber dried in Lumber Drying Kiln CDK that is greater than 125 million board feet. [PSD/BACT, 40 CFR 52.21]

NEW CONDITION

- iii. Any 12-consecutive month total of operational hours for the Planer Mill (ID No. PM) that is greater than 6,000 hours and calculated emission increases for the kiln project that show an exceedance for SER for any pollutant. This exceedance shall apply for five years after the startup of the Lumber Drying Kiln (ID No. CDK). [PSD/BACT, 40 CFR 52.21]

- 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)

MODIFIED CONDITION

- i. Any adverse condition discovered by the weekly inspections of the cyclones (ID Nos. PMC and SFSCY) required by Condition 5.2.2.

- ii. – vii. [no changes]

6.2 Specific Record Keeping and Reporting Requirements**MODIFIED CONDITION**

- 6.2.2 The Permittee shall maintain monthly records of the amount of the dried lumber processed through Lumber Drying Kilns LDK1, LDK2, LDK3 and in Lumber Drying Kiln CDK, separately, necessary to confirm compliance with the production limits in Conditions 3.2.1 and 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.
[391-3-1-.02(6)(b)1(i), 40 CFR 70.6(a)(3)(ii)(B) and 40 CFR 52.21]

MODIFIED CONDITION

- 6.2.3 The Permittee shall calculate and record, each month, a 12-consecutive month total of the lumber dried in Lumber Drying Kilns LDK1, LDK2, LDK3 and in Lumber Drying Kiln CDK, separately, using the monthly records required in Condition 6.2.2. A 12-consecutive month total shall be defined as the sum of a current month's total plus the totals for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i) and 40 CFR 52.21]

MODIFIED CONDITION

- 6.2.4 The Permittee shall submit a semiannual report of the 12-consecutive month totals of lumber dried (in million board feet) in Lumber Drying Kilns LDK1, LDK2, LDK3 and in Lumber Drying Kiln CDK, separately, by August 29 of the calendar year of record and by February 28 of the year following the calendar year of record, unless otherwise approved by the Division. The semiannual reporting periods shall be January 1 through June 30 and July 1 through December 31. The reports, submitted in a manner suitable to the Division, shall be prepared from records required by Condition 6.2.3 and contain six 12-consecutive month totals of lumber produced in Lumber Drying Kilns LDK1, LDK2, LDK3 and in Lumber Drying Kiln CDK, separately.
[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i) and 40 CFR 52.21]

MODIFIED CONDITION

- 6.2.5 The Permittee shall notify the Division in writing if the Lumber Drying Kilns LDK1, LDK2, LDK3 production exceeds 18,333,333 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 3.2.1.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

NEW CONDITION

- 6.2.8 The Permittee shall notify the Division in writing if the Lumber Drying Kiln (ID No. CDK) production exceeds 10,416,666 board feet of lumber 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 and 40 CFR 70.6(a)(3)(i)]

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- a. Reports shall be manually kept for each batch (or charge) processed and shall contain at a minimum, the date, charge quantity, actual drying time, maximum wet-bulb actual and set-point temperature, dry-bulb actual and set-point temperature over the lumber drying time range, and the final target moisture content.
- b. For each visual inspection, the logbook shall contain the date, the initials of the personnel conducting the inspection, results of the visual inspection, documentation of any maintenance performed and any calibration performed on the kiln operation control equipment.

NEW CONDITION

- 6.2.9 The Permittee shall furnish the Division written notification of the actual date of initial startup of Lumber Drying Kiln (ID No. CDK), within 15 days after such date.
[391-3-1-.03(2)(c)]

NEW CONDITION

- 6.2.10 The Permittee shall maintain records of the number of hours of operation amount of the Planer Mill (ID No. PM). 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.
[391-3-1-.02(6)(b)1(i), 40 CFR 70.6(a)(3)(ii)(B) and 40 CFR 52.21]

NEW CONDITION

- 6.2.11 The Permittee shall notify the Division in writing if the hours of operation for the Planer Mill (ID No. PM) exceed 6,000 hours of operation during any twelve consecutive month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 3.2.5.
[391-3-1-.02(6)(b)1(i), 40 CFR 70.6(a)(3)(ii)(B) and 40 CFR 52.21]