



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Interfor U.S. Inc. – Baxley Sawmill
Facility Address: 1830 Golden Isles East
Baxley, Georgia 31513 Appling County
Mailing Address: 1830 Golden Isles East
Baxley, Georgia 31513
Parent/Holding Company: International Forest Products Limited
Facility AIRS Number: 04-13- 001-00005

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 an amendment to the Part 70 Operating Permit for:

Changing the BACT limit in existing Condition 3.2.4 and removing the PSD avoidance limit in existing Condition 3.2.5.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-001-0005-V-05-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. 42931 dated November 10, 2016; any other applications upon which this Amendment or Permit No. 2421-001-0005-V-05-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

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



[Signed]

Richard E. Dunn, Director
Environmental Protection Division

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

Interfor U.S. Inc. – Baxley Sawmill (hereinafter “facility”) submitted a PSD and Title V permit amendment application dated November 10, 2016, which was logged in as Application No. TV-42931, to relax the prevention of significant deterioration (PSD) avoidance limit in existing Condition 3.2.5 of Title V Permit Amendment No. 2421-001-0005-V-05-1 by conducting a PSD review. The facility also proposed to use the best available control technology (BACT) limit resulted from this PSD review to replace the BACT limit in existing Condition 3.2.4 of Title V Permit Amendment No. 2421-001-0005-V-05-1.

The facility proposed to relax the PSD avoidance limit, which is an annual production limit, because the facility’s lumber drying capacity is projected to increase due to improvements in energy efficiency. In the proposed PSD review, the facility proposed a PSD netting practice which includes the conversion of Kilns KL02 and KL04 and removal of existing Boiler PB01. As a result, the facility proposed to re-establish a facility-wide VOC BACT limit of 250 MMbf/yr.

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Interfor U.S. Inc. – Baxley Sawmill

Permit No.: 2421-001-0005-V-05-4

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 Updated Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PB02	Hurst Power Boiler Hurst Boiler Inc. Model H-7500-200 Capacity = 61 MMBtu/hr Installed on September 1, 1988 Fuel: Wood Waste (Green Sawdust)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)2.	3.2.3, 3.3.5, 3.3.6, 3.4.6, 3.4.8, 4.2.2, 4.2.4, 4.2.5, 5.2.2, 5.2.3, 5.2.9, 5.2.10, 5.2.11, 5.2.12, 6.1.8, 6.2.3, 6.2.4	HMC1	Multiclone
				HESP	Electrostatic Precipitator
SM01	Sawmill Process Group	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.4.5, 3.4.7, 5.2.11, 5.2.13, 6.1.8, 6.1.9, 6.2.1	CY01	Cyclone
				CY02	Cyclone
				CY03	Cyclone
				BH02	Baghouse
PM01	Planer Mill Capacity = 73 tons/hr Installed in 1995	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.2, 3.4.5, 3.4.7, 5.2.5, 5.2.6, 5.2.11, 6.1.8	CY04	Cyclone
				CY05	Cyclone
				PBH1	Baghouse
KL01	Lumber Dry Kiln No. 1 Indirect Steam Heated Batch Drying Kiln Capacity = 44 MMbf/yr Installed in 1974 Reconstructed in 2000	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.4, 3.2.5 , 3.3.4, 3.4.5, 3.4.7, 6.1.8 , 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19	None	None
KL02	Lumber Dry Kiln No. 2 Direct-fired Continuous Drying Kiln Capacity = 103 MMbf/yr Modified from Batch Operation to Continuous Operation in 2013	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.4, 3.2.5, 3.2.6 , 3.3.4, 3.4.5, 3.4.7, 6.1.8 , 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19, 6.2.20	None	None
KL04	Lumber Dry Kiln No. 4 Indirect Steam Heated Continuous Drying Kiln Capacity = 103 MMbf/yr Installed in 1990 Modified from Batch Operation to Continuous Operation in 2011	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.4, 3.2.5 , 3.3.4, 3.4.5, 3.4.7, 6.1.8 , 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19	None	None

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

** Modified and new conditions are in bold.

*** Deleted requirements/conditions are in strikethrough.

3.2 Equipment Emission Caps and Operating Limits

Modified Conditions

- 3.2.4 The Permittee shall not process more than 250 million board feet of lumber in the lumber dry kilns with ID Nos. KL01, KL02, and KL04, combined, during any twelve consecutive months.
[40 CFR 52.21]
- 3.2.5 The Permittee shall fire only clean cellulosic biomass as defined in 40 CFR 241, which may include but are not limited to dry wood shavings from the planer mill, in Lumber Dry Kiln No. 2 (ID No. KL02).
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]

New Condition

- 3.2.6 The Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for Lumber Dry Kiln No. 2 (ID No. KL02). 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.
 - ii. The lumber kiln shall be operated following a wet bulb temperature set-point-drying schedule of 220°F or lower.
 - iii. Routines for periodic preventative maintenance are detailed in Paragraphs b, c, d, e, and f of this condition, and are based on manufacturer's recommendations.
 - b. Routine Before or During each Kiln Charge:
 - i. 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.
 - ii. Ensure that all Resistance Temperature Detectors (RTDs) are in the airflow.
 - iii. Check all baffles for damage, record problems and repairs done.
 - iv. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - v. Ensure that the kiln computer controller is functioning properly.

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- vi. Check to verify that the heating system is operating properly.
- c. Weekly Routine:
 - i. Replace wet bulb socks (unless done so on a daily basis).
 - ii. Drain oil or water from transducer air supplies.
 - iii. Clean tracks through kilns, to remove accumulated dust.
 - iv. Ensure all amp-meters are operational.
- d. Monthly Routine:
 - i. Grease lumber truck wheels.
 - ii. Check bearing bolts on fans.
 - iii. Check motor/fan drive belts. Grease fan motors and bearings, and inspect fans for damage. Check fan clearance and rotation. Adjust tension and replace belts if required.
 - iv. Inspect kiln walls and doors for deterioration; schedule repairs if necessary.
 - v. Inspect temperature sensor mounts for damage.
 - vi. Ensure control room's air conditioner/heater is working properly for maintaining correct temperature for electrical components.
 - vii. Inspect air-venting motors for proper attachment to the mounting bases; ensure that arms are functioning properly.
- e. Semi-Annually:
 - i. Check connection on all RTDs.
- f. Annually:
 - i. Check tracks for damage.
 - ii. Inspect area at base of kiln door for damage.
- g. The Permittee shall correct any adverse condition, discovered by an inspection done in accordance with this condition, in the most expedient manner possible and note the corrective action taken. If not immediately correctable, the Permittee shall implement a corrective action plan within 24 hours after an adverse condition has discovered during inspections per Paragraphs b. through f. A record of the adverse condition and the corrective action(s) taken shall be kept.

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The Permittee shall also record any exceedances of the work practice standards and preventive maintenance program and corrective action taken to prevent any future exceedances. The record must include the following:

- i. Any time a wet bulb temperature set-point-drying scheduled more than 220°F.
- ii. Any time a final moisture content drying operation targeted less than 12%.

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

Modified Condition

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.
[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

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

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

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

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

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any twelve consecutive month period for which the total amount of lumber dried in the lumber dry kilns with ID Nos. KL01, KL02, and KL04, combined, exceeds 250 million board feet.
 - ii. Any constituent/parameter of used oil, analyzed in accordance with Condition 5.2.10, exceeds the associate specification specified in Condition 3.3.6.
 - iii. Any time that the fuel burned in Lumber Dry Kiln No. 2 (ID No. KL02) does not meet the requirements specified in Condition 3.2.5.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Any three-hour average total secondary power (arithmetic average of three contiguous one-hour periods) of the electrostatic precipitator with ID No. HESP, as determined in accordance with Condition 6.2.4, that is less than 9,612 watts.
 - ii. Any daily oxygen level at the Boiler PB02 exit, as determined in accordance with Condition 5.2.2c, that is outside the range established during the most recent performance test.
 - iii. Any daily steam generation rate of Boiler PB02, as determined in accordance with Condition 5.2.2d, that is 10 percent more than the average steam generation rate established during the most recent performance test.

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- iv. Any adverse condition(s) discovered by the weekly inspections specified in Condition 5.2.11.
- v. Any two consecutive daily determinations of visible emissions, determined in accordance with Condition 5.2.5, from the baghouse with ID No. PBH1.
- 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:
 - i. The quantity and analysis of used oil burned from on-site sources. The analysis shall also include the on-specification parameters listed in Condition 3.3.6.

6.2 Specific Record Keeping and Reporting Requirements

6.2.14 Deleted.

6.2.15 Deleted.

6.2.16 Deleted.

6.2.17 Deleted.

6.2.18 Deleted.

6.2.19 Deleted.

6.2.20 Deleted.