

Facility Name: **Ace Pole Acquisition, LLC**
City: Blackshear
County: Pierce
AIRS #: 04-13-229-00006

Application #: TV-562770
Date Application Received: May 10, 2021
Permit No: 2491-229-0006-V-03-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Ace Pole Acquisition, LLC

2. Parent/Holding Company Name

AP Timber Holdings, LLC

3. Previous and/or Other Name(s)

Ace Pole Company, LLC

4. Facility Location

6352 Timber lane
Blackshear, Georgia 31516

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

Ace Pole Acquisition, LLC (hereinafter ‘facility’) is located in Pierce County, an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2491-229-0006-E-02-0	May 13, 2020	The permit is for the operation of Kiln 4, to remove the heat input limitation of 30 MMBtu/hr for Boiler B1, to update that Boiler B2 is a natural gas fired boiler, to update facility PTE and regulatory applicability and to change the facility classification from a synthetic minor source to a Title V major source.

D. Process Description

1. SIC Codes(s)

2491

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces rough-cut timber and pressure-treated utility poles.

3. Overall Facility Process Description

The facility operations include receiving the pine timber, which is first sent to be debarked in one of the two debarkers. The debarked pine logs are sent to one of the two peelers, which further smooths the logs. The smooth logs are treated for mold prevention by spraying mold preventive chemicals on the logs. The treated logs then get transported by rail mounted cradles to one of the four kilns for drying. The kilns are heated by steam generated by the wood fired Boiler B1 or natural gas fired Boiler B2. After drying, the logs are staged in the yard to be prepared for its end use. Pressure treating takes place in the on-site treatment building where the poles are transported by rail into the two pressure cylinders. In the cylinders the poles are treated with chromated copper arsenate(CCA). Once treated, the poles are ready to be shipped to the customer.

Wood preservation treatment process is the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. The facility's treating plant consists of 2 pressure cylinders (retorts), drip pad and bulk liquid tanks for the storage of the waterborne inorganic arsenical wood preservative (Chromated Copper Arsenate). Initially a vacuum process is used to remove air from the wood. Then, the pressure fill of the chemicals is done.

As requested in a supplemental application dated April 28, 2023, the facility requested to construct and operate the fifth kiln (ID No. KLN5) while the combined facility-wide annual throughput cap will remain unchanged.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Ace Pole Acquisition, LLC is located in Pierce County, which is in attainment for all criteria pollutants. The PSD major source threshold is 250 tons per year (tpy) because the site is not one of the listed 28 source categories under PSD/NSR regulations. The facility is a non-major source under PSD regulations since the potential emissions of all PSD pollutants are less than their respective PSD major source thresholds.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓	✓		
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓
Total GHG	✓			✓

3. MACT Standards

Boiler B1 is subject to 40 CFR 63 Subpart JJJJJ Area Source GACT. Because the facility is an area source for HAP and because Boiler B1 was constructed before June 4, 2010, Boiler B1 is considered an existing source in accordance with 40 CFR 63 Subparts A and JJJJJ.

The wood preservation treatment operations are subject to 40 CFR 63 Subpart QQQQQQ, "National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources."

The drying kilns at the facility are not subject to the plywood and composite wood product MACT (40 CFR 63 Subpart DDDD) since the facility is not a major source of HAP.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	yes
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

None applicable.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

On April 28, 2023, the Division received a letter from the facility to request the construction and operation of a fifth drying kiln (KLN5). The facility will keep the 71.7 MMBf/year drying limit currently in the E-Permit No. 2491-229-0006-E-02-0 Condition 3.2.1.

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
B1	Union Iron Works Wood-fired Boiler 53.84 MMBtu/hr	40 CFR 63 Subpart A 40 CFR 63 Subpart JJJJJ 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)2.	MC	Multiclone
B2	Industrial Boiler Co. Natural Gas-fired Boiler 25.2 MMBtu/hr	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)2.	n/a	n/a
KLN1	Kiln 1 Batch and Steam Heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
KLN2	Kiln 2 Batch and Steam Heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
KLN3	Kiln 3 Batch and Steam Heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
KLN4	Kiln 4 Batch and Steam Heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
KLN5**	Kiln 5 Batch and Steam Heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
WP1	CCA Pressure Treatment Process	40 CFR 63 Subpart A 40 CFR 63 Subpart QQQQQ 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
WP2	Fugitive emissions from mold treatment	391-3-1-.02(2)(n)	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 are intended as a compliance tool and may not be definitive.

** Proposed with this application.

B. Equipment & Rule Applicability

Emission and Operating Caps:

The permit limits lumber processing rate to 71.7 MMBf per year, which will result in potential VOC emissions of 143.4 tons per year. The facility-wide VOC PTE will therefore be capped below 250 tpy, and the facility is minor under PSD regulations.

Rules and Regulations Assessment:

Boiler B1 is not subject to NSPS Subpart Dc (40 CFR 60 Subpart Dc) because it was installed prior to June 9, 1989 (NSPS Dc applicability date).

Boiler B1 is subject to 40 CFR 63 Subpart JJJJJ Area Source GACT. Because the facility is an area source for HAP and because Boiler B1 was constructed before June 4, 2010, Boiler B1 is considered an existing source in accordance with 40 CFR 63 Subparts A and JJJJJ. This rule requires a one-time energy assessment and an initial tune-up which were already satisfied. The rule also requires ongoing biennial tune-ups. The rule does not have any numerical emission limits for a wood-fired boiler. During each year that the biennial tune-up is required, the facility must submit a biennial compliance certification report.

Boilers B1 is subject to Georgia Rule (d) for PM emission and visible emission limits. Although a wood fired boiler would emit some PM emissions and visible emissions, Boiler B1 is expected to comply with the GA Rule (d) PM emission and visible emission limits because its emissions are controlled by a multiclone (ID No. MC). To ensure proper operation of Multiclone MC and ongoing compliance with the GA Rule (d) limits, daily visible emission checks and MC pressure drop monitoring are required.

Georgia Rule (g) limits the sulfur content of the fuel fired in Boiler B1 to less than 2.5%. Since Boiler B1 fires exclusively on wood, and wood contains minimal amount of sulfur, compliance with the GA Rule (g) sulfur content limit is expected.

Boiler B2 was constructed in 1999 and is subject to NSPS 40 CFR 60 Subpart Dc. Boiler B2 is only subject to the fuel recordkeeping requirements specified in 40 CFR 60.48c(g)(2) or (3).

Since Boiler B2 burns natural gas only, it meets the definition of a gas-fired boiler and is not subject to the Boiler GACT.

Boilers B2 is subject to Georgia Rule (d) for PM emission and visible emission limits. Boiler B2 is expected to comply with the GA Rule (d) PM emission and visible emission limits because Boiler B2 is a natural gas fired boiler.

Georgia Rule (g) limits the sulfur content of the fuel fired in Boiler B2 to less than 2.5%. Since Boiler B2 fires exclusively on natural gas, compliance with the GA Rule (g) sulfur content limit is expected.

Opacity from the drying kilns is limited to 40% by Georgia Rule (b).

PM emissions from the drying kiln operations are limited by Georgia Rule (e).

The drying kilns at the facility are not subject to the plywood and composite wood product MACT (40 CFR 63 Subpart DDDD) since the facility is not a major source of HAP.

The wood preservation treatment operations WP1 are subject to 40 CFR 63 Subpart QQQQQQ, "National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources."

WP1 is subject to Georgia Rule (b) for visible emission limit and Georgia Rule (e) for PM emission limit.

WP2 is subject to Georgia Rule (n) for fugitive emissions.

C. Permit Conditions

Condition 3.2.1 limits the lumber processing rate to 71.7 MMBf per year. This annual throughput limit will apply to all four existing kilns (ID Nos. KLN1 through KLN4) and the new kiln (ID No. KLN5) and would still be equivalent to potential VOC emissions of 143.4 tons per year. This limit will ensure that the facility remains a PSD minor source of VOC.

Condition 3.2.2 specifies the fuel type for Boiler B1. It also subsumes the GA Rule (g) fuel sulfur content limit.

Condition 3.2.3 specifies the fuel type for Boiler B2. It also subsumes the GA Rule (g) fuel sulfur content limit. Boiler B02 also avoids being subject to 40 CFR 63 Subpart JJJJJJ by being a gas-fired boiler.

Condition 3.3.1 subjects Boiler B2 to all applicable requirements of 40 CFR 60 Subpart Dc. For natural gas-fired boilers, NSPS does not have any PM emission limits. This NSPS requires recordkeeping of fuel consumption in the boiler.

Condition 3.3.2 subjects Boiler B1 to all applicable requirements of the area source boiler GACT 40 CFR 63 Subpart JJJJJJ since the facility is a minor source of HAP emissions and the boiler burns wood.

Conditions 3.3.3 through 3.3.5 are the MACT 40 CFR 63 Subpart QQQQQQ requirements for the operation of wood preserving treatment operations.

Condition 3.4.1 includes applicable operations to the 40% opacity limit per Georgia Rule (b).

Condition 3.4.2 includes applicable operations to Georgia Rule (e).

Condition 3.4.3 includes the Rule (d) particulate matter (PM) emission limit and opacity requirement for the boilers.

Condition 3.4.4 is the standard fugitive emission condition requiring Permittee to take all precaution to limit fugitive emissions per Georgia Rule (n).

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

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

B. Specific Testing Requirements

Permit Condition 6.2 in Permit No. 2491-229-0006-E-02-0 requires a one-time CO test for Boiler B1. It has been removed since the facility finished the performance test on November 3, 2020.

V. Monitoring Requirements

A. General Monitoring Requirements

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

B. Specific Monitoring Requirements

Condition 5.2.1 requires the Permittee to monitor the pressure drop across the boiler B1 multiclone to ensure effective PM control once during each day of operation.

Condition 5.2.2 requires daily VE checks for Boiler B1. If VE are detected, corrective action must be taken.

Condition 5.2.3 specifies the elements of the biennial performance tune-ups of boiler B1 per the area source boiler MACT.

Condition 5.4 in Permit No. 2491-229-0006-E-02-0 specifies the one-time energy assessment required by the area source boiler MACT for existing boiler B1. It has been removed since the facility finished the one-time energy assessment on September 14, 2020.

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant (PM). [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

Boiler B1 is potentially subject to the CAM requirements because it is subject to the PM and visible emission limit specified in GA Rule (d) and uses the multiclone (ID No. MC01) to achieve compliance. However, per 40 CFR 64.2(b)(1)(i), B1 is subject to 40 CFR 63 Subpart JJJJJ, and is therefore not subject to the CAM requirements.

All the other emission units included in Table 3.1 of the proposed permit are not equipped with any control devices. Therefore, they are not subject to the CAM requirements.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7 of the proposed Title V initial permit contains the following definitions of exceedances and excursions:

- Subparagraph b.i defines an exceedance as any twelve consecutive month period for which the total amount of lumber dried by all five kilns onsite, combined, exceeds 71.7 MMBF.
- Subparagraph c.i defines an excursion as any failure to carry out the monitoring required by Conditions 5.2.1 or 5.2.2.
- Subparagraph c.ii defines an excursion as any two consecutive daily pressure drop readings, obtained in accordance with Condition 5.2.1a., that are outside the manufacturer recommended pressure drop range.
- Subparagraph c.iii defines an excursion as any two consecutive days that visible emissions are observed from Boiler B1 multicloner (ID No. MC), per Condition 5.2.2, and are not corrected on the same day.
- Subparagraph c.iv defines an excursion as any failure to conduct biennial tune-up of B1.

Conditions 6.2.1 contains the general recordkeeping requirements.

Condition 6.2.2 is the NSPS Dc natural gas consumption recordkeeping requirement for Boiler B2.

Conditions 6.2.3 through 6.2.5 include the recordkeeping and reporting requirements of 40 CFR Part 63 Subpart JJJJJ for Boiler B1.

Conditions 6.2.6 is reporting requirements of 40 CFR Part 63 Subpart QQQQQQ for the wood preservative treatment operations.

Condition 6.2.7 requires monthly records of the amount of dried lumber processed and requires notification if the monthly threshold is exceeded.

Condition 6.2.8 requires them to calculate the 12-month rolling total of lumber processed and to notify the Division if the annual throughput exceeds 71.7 MMbf.

Conditions 7.5 and 7.6 in Permit No. 2491-229-0006-E-02-0 have been removed since the facility submitted Initial Notification and Notification of Compliance Status for Boiler B1 for 40 CFR 63 Subpart JJJJJ on September 10, 2020.

Conditions 7.10 and 7.11 in Permit No. 2491-229-0006-E-02-0 have been removed since the facility submitted Initial Notification and Notification of Compliance Status for CCA Pressure Treatment Process WP1 for 40 CFR 63 Subpart QQQQQ on September 10, 2020.

VII. Specific Requirements**A. Operational Flexibility**

None applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

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

D. Temporary Sources

None applicable

E. Short-Term Activities

None applicable

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility has indicated in the application that they are subject to Stratospheric Ozone Protection Requirements since the facility is an aged facility.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

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

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

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

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

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//