Facility Name:	Langdale Forest Products Co.	
City:	Valdosta	
County:	Lowndes	
AIRS #:	04-13-185-00009	
	Application #:	TV-639766 and 910502
Date A	pplication Received:	May 27, 2022 and February 18, 2025
	Permit No:	2421-185-0009-V-05-0

Program	<b>Review Engineers</b>	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:

Langdale Forest Products Co.

2. Parent/Holding Company Name

Langdale Industries, Inc.

3. Previous and/or Other Name(s)

Southern Reman, Inc. TLC Building Components

4. Facility Location

1202 Madison Highway Valdosta, Georgia 31601

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

Langdale Forest Products Co. (hereinafter "facility" or "LFP") is located in Lowndes County, which is in attainment for all criteria pollutants.

# B. Site Determination

Langdale Forest Products Co. (AIRS No. 185-00009) and TLC Building Components (hereinafter "TLC"), formerly known as Southern Reman, Inc. (AIRS No. 185-00094) used to operate under separate Title V permits but were part of the same Title V site. Per the facility's request in Title V Application No. TV-20581, starting with Permit No. 2421-185-0009-V-03-0, Title V renewal permits are issued to Langdale Forest Products Co. as the combined permit for both facilities. There are currently no other applicable issues with regard to the site determination.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1. List of Current Fernits, Amendments, and Off Fernit Changes				
Permit Number and/or Off-	Date of Issuance/	Purpose of Issuance		
Permit Change	Effectiveness			
2421-185-0009-V-04-0	November 30, 2017	Transfer of Ownership		
2421-185-0009-V-04-1	January 27, 2020	Extension of the kiln conversion due date to		
		June 30, 2020		
OPC	August 25, 2022	Replacement of components in Planer Mill		
		Group with functionally identical equipment		

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

# D. Process Description

# 1. SIC Codes(s)

2421

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 southern yellow pine dimensional lumber and finished lumber, which also includes wooden poles and posts.

3. Overall Facility Process Description

# Log Processing Group (LPG)

Southern yellow pine logs of tree length are received at the facility by trucks and are fed to the Log Processor, where they are debarked in one of two debarkers. They are then scanned and sawed into 10' to 20' lengths and being transferred to the sawmill group for further processing. Each tree length stem is cut into pieces. Chips and bark are conveyed to bins.

# Sawmill Group (SMG)

The sawmill cuts large and small logs into dimensional lumber. The sawmill equipment includes a log canter, a twin-band saw, and a curvesaw gang. The sawn boards are trimmed, stacked, and sorted by thickness, width, and length.

The facility has two chippers with wood residue transfer cyclones above the two shaker screens. Sawdust and chips, along with bark generated from the log processing group, are processed and utilized as residual products for industrial fuels and landscaping materials.

# Lumber Drying

Lumber drying is accomplished in one of three Dual Path Continuous Dry Kilns (ID Nos. DK02, DK03, and DK07). Each kiln has a dedicated 30 MMBtu/hr sawdust burner. Kilns DK02 and DK03 are fueled with green sawdust from an associated fuel bin. Kiln DK07 also has a fuel bin but utilizes a fuel silo that receives sawdust mechanically conveyed from the sawmill. Sawdust from the DK07 silo is typically conveyed directly to the DK07 firebox or to a truck bin if not needed as fuel.

# Planer Mill Group (PMG1)

Dried lumber is processed at the Planer Mill (ID No. PMG1), where each board is dressed, or smoothed, to exact specifications. The Planer Mill shavings are collected and conveyed by a cyclone (ID No. CY06) to the Shaving Truck Bin. The truck bin is equipped with a Filter Feeder Cyclone (ID No. CY07). Cyclone emissions are controlled by a baghouse (ID No. BH01). Every piece of lumber is then assessed, graded, and then trimmed to a specific length before it is sorted by length and grade and packaged.

Finished, packaged lumber is then stored in one of the multiple dressed lumber sheds to await shipping to customers.

#### Additional Activities

TLC Building Components is adjacent to and is under common ownership with Langdale Forest Products Co. TLC receives lumber products from LFP and other sawmills and cuts or planes the lumber into salable lumber and wood products. Sawdust and shavings from this process are collected and sold. TLC consists of two buildings – one contains resaws and a transfer cyclone (ID No. CY1). The other (ID No. MLD2) contains one moulder, various saws, and a baghouse (ID No. BH02).

By-products produced at the facility include bark, chips, sawdust, and shavings.

4. Overall Process Flow Diagram

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

#### E. Regulatory Status

# 1. PSD/NSR

Langdale Forest Products Co. (hereinafter "facility") is not one of the 28 named source categories under Prevention of Significant Deterioration (PSD) regulations. It is classified as a major source under PSD regulations because its potential-to-emit (PTE) for volatile organic compounds (VOC) is greater than 250 tons per year (tpy). The facility underwent a PSD review for VOC in 2011 for removing the PSD avoidance limits for existing Batch Kilns DK03 and DK07. In order to avoid a PSD review for fine particulate matter (PM<sub>2.5</sub>), the resulting PSD

permit included a production limit for each of Batch Kiln DK07 and Planer Mill Group PMG1. The PSD avoidance limits were included in Existing Conditions 3.2.1 through 3.2.3.

In Application No. TV-46142, the facility proposed to replace three of the existing batch lumber drying kilns into direct-fired continuous lumber drying kilns, and to decommission the remaining batch kilns upon startup of the new kilns.

The facility notified the Division on January 25, 2019, that two of the three kilns (ID Nos. DK02 and DK07) had completed conversion into continuous kilns. On April 13, 2020, the facility submitted notification that the remaining direct-fired continuous lumber-drying kiln (ID No. DK03) had completed conversion and that the remaining existing batch kilns (ID Nos. DK01, DK03, DK04, and DK06) and the existing boiler (ID No. BLR1) had been decommissioned.

As a result, the PSD avoidance limits for the planer mill group (ID No. PMG1) and Kiln DK07 are no longer needed. Instead, the three new continuous kilns (ID Nos. DK02, DK03, and DK07) are subject to a combined production limit of 197 million board feet (MMbf) during any twelve consecutive months. This PSD avoidance limit is included in New Condition 3.2.1 of the proposed Title V renewal permit. Note that, in this process, a new baseline was established for PSD avoidance, and the PSD avoidance limits in existing Conditions 3.2.1 through 3.2.3 were replaced by New Condition 3.2.1 of the proposed Title V renewal permit.

Non-attainment area New Source Review (NAA NSR) is not applicable because Lowndes County is an attainment area for all criteria pollutants.

2. Title V Major Source Status by Pollutant

	Is the	If emitted, what is the facility's Title V status for the pollutant?		
Pollutant	Pollutant Emitted?	Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	YES		$\checkmark$	
PM10	YES		✓	
PM <sub>2.5</sub>	YES		✓	
SO <sub>2</sub>	YES			$\checkmark$
VOC	YES	✓		
NO <sub>x</sub>	YES			$\checkmark$
СО	YES	✓		
TRS	NO			
H <sub>2</sub> S	NO			
Individual HAP	YES	~		
Total HAPs	YES	✓		
Total GHG	YES			$\checkmark$

#### Table 2: Title V Major Source Status

# 3. MACT Standards

Because the facility is major for single and combined HAP emissions, it is subject to 40 CFR 63 Subpart DDDD, "National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products." The provisions of the subpart do not specify any control requirements for lumber kilns, but do require notification of initial startup.

Because the facility's boiler (ID No. BLR1) was decommissioned, the facility is no longer subject to 40 CFR 63 Subpart DDDDD, "NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters."

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	YES
Program Code 8 – Part 61 NESHAP	NO
Program Code 9 - NSPS	NO
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

None applicable.

C. Compliance Status

Application No. TV-639766 indicates that the facility is in compliance with all applicable regulations.

D. Permit Conditions

None applicable.

# **III.** Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Air Pollution Control Devices		
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
	Lumber Drying Kiln 2	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD		
DK02	Direct Fired Continuous Kiln Burner = 30 MMBtu/hr Throughput = 76.7 MMbf/yr	391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(g)	N/A	None
DK03	Lumber Drying Kiln 5 Direct Fired Continuous Kiln Burner = 30 MMBtu/hr Throughput = 76.7 MMbf/yr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(g)	N/A	None
DK07	Lumber Drying Kiln 7 Direct Fired Continuous Kiln Burner = 30 MMBtu/hr Throughput = 76.7 MMbf/yr	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-102(2)(b) 391-3-102(2)(e) 391-3-102(2)(g)	N/A	None
PMG1	Planer Mill Group Throughput = 68 tons/hr	391-3-102(2)(b) 391-3-102(2)(e)	CY06 BH01	Cyclone Baghouse
MLD2	Moulder No. 2 Throughput = 22 tons/hr	391-3-102(2)(b) 391-3-102(2)(e)	BH02	Baghouse

# B. Equipment & Rule Applicability

Emission and Operating Caps:

In 2005, Permit Amendment No. 2421-185-0009-V-01-3 was issued to Langdale Forest Products, authorizing the construction of Drying Kiln No. 7. Prior to the installation of Drying Kiln No. 7, Langdale Forest Products was a major source under the PSD regulations, because the cumulative emissions of VOC from the existing equipment exceeded 250 tons per year. To avoid review and permitting under the PSD regulations, the VOC emission increase from the facility was limited to less than 40 tons per year. To restrict the VOC emission increase, a production limit was placed on existing Drying Kiln No. 3 and new Drying Kiln No. 7. These requirements were then included in the Title V renewal Permit No. 2421-185-0009-V-02-0 issued in 2006. Drying Kiln No. 7 was installed in 2007.

In 2008, Langdale Forest Products requested the removal of PSD avoidance limits. The removal of these avoidance limits, therefore, triggered a PSD review for VOC for Drying Kiln No. 7. During this PSD review, production limits on Drying Kiln No. 7 and the Planer Mill Group (ID No. PMG1), as well as a PM2.5 emission limit for PMG1, were needed to limit the increase of PM2.5 to less than the PSD significance level of 10 tons per year. These PSD avoidance limits were included in Title V Permit No. 2421-185-0009-V-03-0 issued in 2012. In March 2017, the facility proposed to replace or modify three existing batch kilns with three direct-fired continuous kilns. After the three new kilns (DK02, DK03, and DK07) were built in 2018, 2019, and 2020, all existing kilns (ID Nos. DK01, DK03, DK04, and DK06) and the wood residue-fired boiler (ID No. BLR1) were retired. Since a new baseline was established for PSD avoidance for this modification, the PSD avoidance limits in

Title V Permit No. 2421-185-0009-V-03-0 were replaced with a new PSD avoidance limit in Title V Permit No. 2421-185-0009-V-04-0. The new PSD avoidance limit was needed to avoid a PSD review for VOC with netting. The PSD avoidance limit is a combined production limit of 197 MMbf/yr.

On February 19, 2025, the facility submitted Application No. 910502 requesting the replacement of the Planer Mill Group Baghouse (ID No. BH01) with a new unit. This modification request is included in this Title V Renewal. The replacement unit will not result in any changes to the manufacturing process flow and will not result in any changes to any permit conditions. Exhaust from Cyclones CY06 will continue to be controlled by Baghouse BH01. The baghouse only emits particulate matter and therefore will not require an updated Toxic Impact Assessment (TIA).

#### Rules and Regulations Assessment:

#### 40 CFR 52.21 – Prevention of Significant Deterioration (PSD)

The facility is major for VOC under PSD regulations. The new lumber drying kilns (ID Nos. DK02, DK03, and DK07) are subject to a PSD avoidance throughput limit of 197 MMbf/yr, combined.

# <u>40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products</u>

Per 40 CFR 63.2231, the facility is subject to 40 CFR 63 Subpart DDDD because it is major for single and combined HAP emissions and manufactured kiln-dried lumber. Please note that all the lumber drying kilns (ID Nos. DK02, DK03, and DK07) are not subject to any compliance options specified in Tables 1A and 1B to Subpart DDDD, any operating requirements specified in Table 2 to Subpart DDDD, or any work practice requirements specified in Table 3 to Subpart DDDD. According to 40 CFR 63.2252, the facility is only subject to the initial notification requirements specified in 40 CFR 63.9(b), which were already satisfied on January 25, 2019, and April 13, 2020. Therefore, all the kilns are subject to this rule, but are not subject to any requirements.

# Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions

Georgia Rule (b) limits visible emissions from all manufacturing equipment to no more than 40% opacity. PM emissions from the planer mill group (ID No. PMG1) are controlled by a cyclone (ID No. CY06) and a baghouse (ID No. BH01), and emissions from the moulder (ID No. MLD2) are controlled by a baghouse (ID No. BH02). Additionally, the lumber drying kilns (ID Nos. DK02, DK03, and DK07) are not inherently expected to produce any visible emissions from regular operation. Therefore, visible emissions are expected to comply with Georgia Rule (b).

# Georgia Rule 391-3-1-.02(2)(d) – Fuel-Burning Equipment

According to the definition specified in GRAQC 391-3-1-.01(cc), "fuel-burning equipment" includes equipment that "furnishes process heat indirectly, through transfer by fluids or transmissions through process vessel walls." Because the lumber drying kilns' burners (ID Nos. DK02, DK03, and DK07) provide direct heat to the kilns by sending the combustion exhaust into the kiln and do not provide

heat via the heating of another medium, they do not qualify as fuel-burning equipment and are therefore not subject to the PM emission limits of Georgia Rule (d).

#### Georgia Rule 391-3-1-.02(2)(e) – Particulate Matter Emissions from Manufacturing Processes

Georgia Rule (e) limits PM emissions based on process input weight rate. Because lumber kilns produce relatively small amounts of PM emissions, and PM emissions from the planer mill (ID No. PMG1) and moulder (ID No. MLD2) are controlled by baghouses, facility-wide PM emissions are expected to comply with Georgia Rule (e) limits.

#### Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide

Georgia Rule (g) limits fuel sulfur content to 2.5%. Because the kilns are restricted to firing only wood, which contains a minimum amount of sulfur, they are expected to comply with the fuel sulfur content limit of Georgia Rule (g).

C. Permit Conditions

Permit Nos. 2421-185-0009-V-04-0 and 2421-185-0009-V-04-1 contain conditions scheduled to become null and void after the startup of the new continuous kilns (ID Nos. DK02, DK03, and DK07) and the shutdown of the remaining batch kilns (ID Nos. DK01, DK03, DK04, and DK06), the wood-fired boiler (ID No. BLR1), and all associated control devices. These conditions have been removed.

Condition 3.2.1 limits the continuous lumber drying kilns (ID Nos. DK02, DK03, and DK07) to processing no more than 197 MMbf of lumber per any twelve consecutive months, for avoidance of a PSD review.

Condition 3.2.2 restricts the lumber drying kilns (ID Nos. DK02, DK03, and DK07) to firing only wood. This requirement subsumes the fuel sulfur requirement of GA Rule (g).

Condition 3.3.1 subjects the lumber drying kilns to all applicable provisions of 40 CFR 63 Subpart A, "General Provisions," and Subpart DDDD, "NESHAP for Plywood and Composite Wood Products." The kilns are only subject to initial startup notification requirements, which were already satisfied.

Condition 3.4.1 limits the opacity of visible emissions from manufacturing processes to 40%, per GA Rule (b).

Condition 3.4.2 limits the amount of PM emissions from manufacturing processes based on the applicable process input weight rate equation, per GA Rule (e).

Conditions 3.4.3 and 3.4.4 require the mitigation of fugitive emissions from plant roads and limit fugitive dust emissions from plant roads to no more than 20%, respectively, per GA 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

Not applicable.

# 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 facility to use a monitoring device to measure the pressure drops for the planer mill group baghouse (ID No. BH01) and the moulder baghouse (ID No. BH02) for each week of operation.

Condition 5.2.2 requires the facility to perform daily VE checks for Baghouses BH01 and BH02. Procedures for performing the checks are included in the condition.

Condition 5.2.3 requires the facility to develop and implement a Preventative Maintenance Program for Baghouses BH01 and BH02 and includes the required operation and maintenance checks.

Condition 5.2.4 requires the facility to perform certain operation and maintenance checks on Planer Mill Group Cyclone CY06, weekly.

The Work Practice and Preventative Maintenance Program for Lumber Drying Kilns DK02, DK03, and DK07 specified in existing Condition 5.2.9 is typically required for a lumber kiln that underwent a PSD review. Since the three kilns did not go through any PSD review, the requirement is no longer included in the proposed Title V renewal permit.

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)]

The planer mill group (ID No. PMG1) and the moulder (ID No. MLD2) are subject to CAM because the facility is a Title V major source, and the processes use control devices (Baghouses BH01 and BH02) to achieve compliance with the GA Rule (b) visible emission standard and GA Rule (e) PM emission standard. Pre-control PM emissions are also greater than 100 percent of the major source threshold.

The CAM plan is commonly used for sources controlled by baghouses. The plan consists of a daily VE check and weekly inspection of the baghouses. The baghouses are also subject to a Preventative Maintenance Program as required by Condition 5.2.3. Conditions 5.2.5 and 5.2.6 contain the CAM requirements for these emission units.

## 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 6.1.7b.i. requires the facility to report as an exceedance any twelve-month period during which the combined throughput of Lumber Drying Kilns DK02, DK03, and DK07 exceeds 197 MMbf in the report required by Condition 6.1.4.

Condition 6.1.7c.i. requires the facility to report as an excursion any visible emissions from Planer Mill Group Baghouse BH01 or Moulder No. 2 Baghouse BH02 that occurs for two consecutive determinations during the checks required by Condition 5.2.2.

Condition 6.1.7c.ii. requires the facility to report as an excursion any time the pressure drop of Planer Mill Baghouse BH01 or Moulder No. 2 Baghouse BH02 is outside the appropriate range established in accordance with Condition 5.2.3.

Condition 6.2.1 requires the facility to maintain monthly records of the amount of the dried lumber processed through Lumber Kilns DK02, DK03, and DK07, combined, and to notify the Division if any monthly total exceeds 16.4 MMbf (1/12 of the annual throughput limit).

Condition 6.2.2 requires the facility to use the records from Condition 6.2.1 to, each month, calculate the twelve-month rolling total of board feet of lumber processed through Lumber Kilns DK02, DK03, and DK07, combined.

# 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

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None 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. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. According to Application No. TV-639766, the facility operates equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

J. Pollution Prevention

None applicable.

# K. Specific Conditions

None 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.