



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Ace Pole Acquisition, LLC
Facility Address: 6352 Timber Lane
Blackshear, Georgia 31516, Pierce County
Mailing Address: P.O. Box 1323
Waycross, Georgia 31502
Parent/Holding Company: AP Timber Holdings, LLC
Facility AIRS Number: 04-13-229-00006

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:

To increase permitted wood drying rate to 84,500,000 bf/year.

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. **2491-229-0006-V-03-0**. Unless modified or revoked, this Amendment expires simultaneously with Permit No. **2491-229-0006-V-03-0**. 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. **TV-783747** dated **October 27, 2023**; any other applications upon which this Amendment or Permit No. **2491-229-0006-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 Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **5** pages.



DRAFT

Jeffrey W. Cown, Director
Environmental Protection Division

Table of Contents

PART 1.0	FACILITY DESCRIPTION.....	1
1.3	Process Description of Modification.....	1
PART 3.0	REQUIREMENTS FOR EMISSION UNITS.....	2
3.1.1	Updated Emission Units.....	2
3.2	Equipment Emission Caps and Operating Limits	2
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection)	3
5.2	Specific Monitoring Requirements	3
PART 6.0	OTHER RECORD KEEPING AND REPORTING REQUIREMENTS	4
6.1	General Record Keeping and Reporting Requirements	4
6.2	Specific Record Keeping and Reporting Requirements.....	5

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

This modification is to increase permitted wood drying rate from 71,700,000 board feet per year (bf/year) to 84,500,000 bf/year. After the modification, the site will remain a minor source of HAPs; the facility will continue to be a PSD minor source because potential emissions of volatile organic compounds will remain below 250 tons per year. This modification also includes information on changes included in an off permit change submitted on October 17, 2023, which involved adding an additional multiclone set to control device MC, the installation of an intake air preheater and wood feed improvements on Wood Boiler B1.

Title V Permit Amendment

Ace Pole Acquisition, LLC

Permit No.: 2491-229-0006-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.

3.1.1 Updated Emission Units

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	Multiclones
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.

3.2 Equipment Emission Caps and Operating Limits

Modified Condition:

- 3.2.1 The Permittee shall not dry more than a total of **84.5** million board feet (MMbf) of lumber through all kilns onsite, combined, during any twelve consecutive months.
[PSD Avoidance – 40 CFR 52.21]

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 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.

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

- a. Pressure drop across the Boiler B1 **multiclones** (ID No. MC). Data shall be recorded at least once during each day that Boiler B1 is operated.

The Permittee shall ensure that the pressure drop is maintained within the manufacturer's recommendations. If the pressure drop is outside of the manufacturer recommended range, the observations and corrective actions shall be recorded in a log and maintained in a condition suitable for inspection by, or submittal to, the Division.

5.2.2 Once each day, or portion of each day of operation, the Permittee shall perform a check for visible emissions from the Boiler B1 **multiclones** (ID No. MC). For any observation of visible emissions, mechanical problems, or malfunctions, the Permittee shall take corrective action and re-inspect the equipment to verify that no visible emissions exist and that any mechanical problems or malfunctions have been corrected. The observations and corrective actions shall be recorded in a log and maintained in a condition suitable for inspection by, or submittal to, the Division.

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

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting RequirementsModified 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)

- i. Any consecutive 12-month period during which the total amount of lumber processed by all kilns onsite, combined and determined in accordance with Condition 6.2.8, exceeds **84.5** million board feet.

- 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 failure to carry out the monitoring required by Conditions 5.2.1 or 5.2.2.
- ii. Any two consecutive daily pressure drop readings, obtained in accordance with Condition 5.2.1a., that are outside the manufacturer recommended pressure drop range.
- iii. Ant two consecutive days that visible emissions are observed from Boiler B1 **multiclones** (ID No. MC), per Condition 5.2.2, and are not corrected on the same day.

- iv. Any failure to conduct biennial tune-up of B1.

6.2 Specific Record Keeping and Reporting RequirementsModified Conditions:

- 6.2.7 The Permittee shall maintain monthly records of the amount of the dried lumber processed through all kilns onsite, combined, necessary to confirm compliance with the production limit in Condition 3.2.1. The Permittee shall notify the Division in writing if the combined monthly total of dried lumber processed from all kilns equals or exceeds **7.04** MMbf. The monthly total dried lumber amount for each kiln shall be calculated based on the total number of batch dryings completed in the kiln in the 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 attain compliance with the limit in Condition 3.2.1.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(iii)]
- 6.2.8 The Permittee shall use the monthly production records required in Condition 6.2.7 to determine the twelve month rolling total of dried lumber processed through all the kilns onsite, combined, for each calendar month. The Permittee shall notify the Division in writing if the combined twelve-month rolling total of dried lumber processed from the entire facility equals or exceeds **84.5** MMbf. 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 compliance with the limit in Condition 3.2.1.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(iii)]