

Prevention of Significant Air Quality Deterioration Review

Final Determination

June 14, 2016

Facility Name: Interfor U.S. Inc. – Preston Sawmill

City: Preston

County: Webster

AIRS Number: 04-13-307-00001

Application Number: TV-40720

Date Application Received: January 25, 2016



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch

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BACKGROUND

On January 25, 2016, Interfor U.S. Inc. Preston (hereafter Interfor Preston) submitted an application for an air quality permit to shutdown wood-fired boilers B-1 and B-2 and steam heated batch kilns DK-1 and DK-2, convert steam heated batch kiln DK-3 to a direct-fired continuous kiln with its own burner and fuel silo, modify direct-fired batch Kilns DK-4 and DK-5 into direct-fired continuous kilns with some burner upgrades, addition of powered stacks to all three continuous kilns and for construction and operation of a new bark loadout system. The facility is located at 378 Tolleson Road in Preston, Webster County.

On May 6, 2016, the Division issued a Preliminary Determination stating that the modifications described in Application No. TV-40720 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that Interfor Preston place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in *Stewart Webster Journal* (legal organ for Webster County) on May 12, 2016. The public comment period expired on June 13, 2016.

During the comment period, comments were received from the facility. There were no comments received from the U.S. EPA region IV or the general public.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

Interfor U.S. Inc. - Preston COMMENTS

Comments were received from Brad James, Manager, Trinity Consultants, by email on May 10, 2016.

Comment 1**Permit Condition 3.3.4**

The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters", and all applicable provisions of 40 CFR Part 63, Subpart A - "General Provisions" as indicated in Table 10 to 40 CFR Part 63, Subpart DDDDD amended on January 31, 2013 and January 21, 2015. In particular, the Permittee shall comply with all the applicable emissions limits and work practice standards of 40 CFR Part 63, Subpart DDDDD by the applicable compliance date specified below; some of the submittal may be due earlier than the compliance date. This condition is null and void if boilers B-1 and B-2 are removed from the facility or January 31, 2017 whichever occurs first:

Interior requests that "or January 31, 2017 whichever occurs first:" be removed for consistency with other permit condition references included in the draft permit. One of the primary reasons for the kiln conversion changes is for the removal of these two boilers (prior to the extended Boiler MACT compliance date for the existing kilns).

Permit Condition 5.2.5

*The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from Boilers B-1 and B-2. **This condition is effective until the boilers are removed from service***

Interfor requests that "or until January 31, 2017 whichever occurs first" is removed for consistency with other conditions for boilers removal from operation at the Preston Mill.

In Conditions 3.3.4, 5.2.5 and 6.2.4 delete the words "or January 31, 2017 whichever occurs first" at the end of the last sentence.

EPD Response: EPD has reviewed the deletion request and agrees that the requested words can be deleted from Conditions 3.3.4, 5.2.5 and 6.2.4 without any change in the enforceability of the condition.

Comment 2: In Condition 3.3.5.a.i. replace the term "infeed" with outfeed at the end of the last sentence.

EPD Response: Interfor has stated that currently the moisture content of the planed lumber is measured at the outfeed of the planer mill. With insignificant moisture reduction in the lumber during the planing process the outfeed moisture content will be almost the same as infeed moisture content. EPD will change the term "infeed" with outfeed in the last sentence in this condition.

Comment 3: Condition 3.4.7 replace the term "before starting up continuous kilns DK-3, DK-4 and DK-5" with "before January 31, 2017".

EPD Response: This condition was worded so that the wood-fired boilers and the continuous kilns being operated simultaneously subjecting the facility to PSD for PM. From a practical aspect after the continuous kilns DK-3, DK-4 and DK-5 are started up there will be no need to operate the wood-fired boilers since there will be no steam-heated kilns at the facility. Also operating the wood-fired boilers beyond January 31, 2017 will subject them to all applicable requirements of the boiler MACT (40 CFR

63 Subpart 5D). Condition 3.4.7 is changed to requiring boiler shutdown before January 31, 2017 for boiler MACT avoidance.

Comment 4: In Condition 6.1.7c, add the sentence “Excursion of boiler multiclones BC-1 and BC-2 are valid till their removal from the facility.” at the end.

Permit Condition 6.1.7.c.iv

Any problem discovered during the inspections in Condition 3.3.5 that is not corrected within 48 hours of discovery.

Interfor requests EPD includes the following (in bold font below) for Condition 6.1.7.c.iv:

Excursion for boiler multiclones BC-1 and BC-2 are valid until their removal from the facility.

EPD Response: EPD is amenable to have this language at the end of Condition 6.1.7.c, no changes in requirement will occur.

Comment 5: Add a new Condition (6.2.5) requiring Interfor Preston to notify EPD within 15 days after complete commissioning of kilns DK-3, DK-4 and DK-5.

EPD Response: EPD has no objection to the requested condition and it is incorporated it in the final PSD permit. Condition 6.2.5 has the notification for the startup of the direct-fired continuous kilns.

APPENDIX A

AIR QUALITY PERMIT

Amendment No. 2421-307-0001-V-04-3

Part 70 Operating Permit Amendment**Permit Amendment No.: 2421-307-0001-V-04-3 Effective Date:****Facility Name:** **Interfor U.S., Inc. – Preston Mill**
378 Tolleson Road
Preston, Georgia 31824 (Webster County)**Mailing Address:** 378 Tolleson Road
Preston, Georgia 31824**Parent/Holding Company:** Interfor U.S. Inc.**Facility AIRS Number:** 04-13-307-00001

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:

Shutdown of wood-fired boilers B-1 and B-2 and steam heated batch kilns DK-1 and DK-2, conversion of steam heated batch kiln DK-3 to a direct-fired continuous kiln with its own burner and fuel silo, modification of direct-fired batch Kilns DK-4 and DK-5 into direct-fired continuous kilns with some burner upgrades, addition of powered stacks to all three continuous kilns and for construction and operation of a new bark loadout system.

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. 2421-307-0001-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. 40720 dated March 25, 2016; any other applications upon which this Permit Amendment or Permit No. 2421-307-0001-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 **14** pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2421-307-0001-V-04-0.

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
3.3	Equipment Federal Rule Standards	3
3.4	Equipment SIP Rule Standards	5
PART 4.0	REQUIREMENTS FOR TESTING	6
4.1	General Testing Requirements	6
4.2	Specific Testing Requirements	6
PART 5.0	REQUIREMENTS FOR MONITORING (RELATED TO DATA COLLECTION)	7
5.2	Specific Monitoring Requirements	7
PART 6.0	OTHER RECORD KEEPING AND REPORTING REQUIREMENTS	10
6.1	General Record Keeping and Reporting Requirements	10
6.2	Specific Record Keeping and Reporting Requirements	12

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

Interfor Preston requested authorization to shut down two wood-fired boilers (B-1 and B-2) and two steam heated batch kilns, Kiln 1 (DK-1) and Kiln 2 (DK-2), modify steam heated batch Kiln 3 (DK-3) into a direct-fired continuous kiln with its own burner and fuel silo, and to modify direct-fired batch kilns Kiln 4 (DK-4) and Kiln 5 (DK-5) into direct-fired continuous kilns with some additional work proposed for their burners. The facility plans to add a powered stack to each of the three continuous kilns (DK-3, DK-4 and DK-5) to assure compliance with the ambient air toxic regulations and aid the dispersion of the HAPs. The Permittee has also proposed to construct and operate a new bark loadout system which will consist of two hoppers, a bark hogger, a bark storage bin and a truck loadout operation.

Title V Permit Amendment

Interfor U.S., Inc. – Preston Mill

Permit No.: 2421-307-0001-V-04-3

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
B-1**	Wood Waste-Fired Boiler No.1 (28.7 MMBtu/hr)	40 CFR 60, Subpart A & Dc 40 CFR 63 Subpart A & 5D GA Rule 391-3-1-.02(2)(d)2.(ii) GA Rule 391-3-1-.02(2)(d)3 GA Rule 391-3-1-.02(2)(g)2	3.3.1, 3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.7, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 6.1.7c.i-iii, 6.2.1, 6.2.2, 6.2.4	BC-1	Multiclone
B-2**	Wood Waste-Fired Boiler No.2 (28.7 MMBtu/hr)	40 CFR 60, Subpart A & Dc 40 CFR 63 Subpart A & 5D GA Rule 391-3-1-.02(2)(d)2.(ii) GA Rule 391-3-1-.02(2)(d)3 GA Rule 391-3-1-.02(2)(g)2	3.3.1, 3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.7, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 6.1.7c.i-iii, 6.2.1, 6.2.2, 6.2.4	BC-2	Multiclone
DK-1**	Drying Kiln No. 1 (Steam heated)	40 CFR 63, Subpart A & 4D GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.3.2, 3.3.3, 3.4.4, 3.4.6, 6.2.3	N/A	N/A
DK-2**	Drying Kiln No. 2 (Steam heated)	40 CFR 63, Subpart A & 4D GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.3.2, 3.3.3, 3.4.4, 3.4.6, 6.2.3	N/A	N/A
DK-3 [#]	Drying Kiln No. 3 (Steam heated)	40 CFR 63, Subpart A & 4D GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)2 40 CFR 52.21(j) (BACT)	3.3.2, 3.3.3, 3.3.5, 3.4.4, 3.4.6, 3.4.7, 6.1.7.c., 6.2.3	N/A	N/A
DK-4 ^{##}	Drying Kiln No. 4 (Direct-fired, 36 MMBtu/hr)	40 CFR 63, Subpart A & 4D GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)2 40 CFR 52.21(j) (BACT)	3.3.2, 3.3.3, 3.3.5, 3.4.4, 3.4.6, 3.4.7, 6.1.7.c., 6.2.3	N/A	N/A
DK-5 ^{##}	Drying Kiln No. 5 (Direct-fired, 40 MMBtu/hr)	40 CFR 63, Subpart A & 4D GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)2 40 CFR 52.21(j) (BACT)	3.3.2, 3.3.3, 3.3.5, 3.4.4, 3.4.6, 3.4.7, 6.1.7.c., 6.2.3	N/A	N/A
PLN1	Planer Mill	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.5, 3.4.6, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.6, 6.1.7c.i-iii, 6.2.1, 6.2.3	PLC1	Relay fan (Shavings bin) Cyclone
BLO1	Bark loadout system	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(n)	3.4.4, 3.4.8	N/A	N/A
PR	Plant Roads	GA Rule 391-3-1-.02(2)(n)	3.4.8, 6.2.3	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 and corresponding permit conditions are intended as a compliance tool and may not be definitive. ** Scheduled to be shut down before January 31, 2017, [#] Steam-heated batch Kiln DK-3 will be converted to a direct-fired continuous kiln. ^{##} Direct-fired batch Kilns DK-4 and DK-5 will be converted to continuous kilns.

3.3 Equipment Federal Rule Standards

Amended Conditions

- 3.3.1 The Permittee shall operate Boiler B-1 and Boiler B-2 in compliance with the provisions of the New Source Performance Standards (NSPS) found in 40 CFR Part 60 Subpart A - "General Provisions" and Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" for operation of the wood-fired boilers (B-1 and B-2). **This condition is null and void after removal of the boilers from the facility.**
[40 CFR 60 Subpart A and Subpart Dc]
- 3.3.3 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subparts A & DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” **for the operation of the drying kilns at the facility.**
[40 CFR 63, Subpart 4D]
- 3.3.4 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDD - “*National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*”, and all applicable provisions of 40 CFR Part 63, Subpart A – “*General Provisions*” as indicated in Table 10 to 40 CFR Part 63, Subpart DDDDD amended on January 31, 2013 and January 21, 2015. In particular, the Permittee shall comply with all the applicable emissions limits and work practice standards of 40 CFR Part 63, Subpart DDDDD by the applicable compliance date specified below; some of the submittal may be due earlier than the compliance date. **This condition is null and void if boilers B-1 and B-2 are removed from the facility:**
[40 CFR 63.7490 and 7495]
- a. No later than **January 31, 2017** for Wood-Waste Fired Boilers (B-1 and B-2) provided that the boiler is an “existing” boiler(s) as defined in 40 CFR 63.7490(d), except as provided in 40 CFR 63.6(i).
 - b. For any “new” or “reconstructed” boiler(s) as defined in 40 CFR 63.7490(b) or 40 CFR 63.7490(c), upon startup.

New Condition

- 3.3.5 For the continuous direct-fired kilns DK-3, DK-4 and DK-5, the Permittee shall develop and implement a Work Practice and Preventive Maintenance Program. 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, 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 will be measured with a moisture meter at the outfeed of the planer mill on a daily basis.

Title V Permit Amendment

- ii. Routines for periodic preventative maintenance are detailed in paragraphs b, c, d and e 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 the corrective actions.
 - ii. Check to verify that the kiln heating systems (direct-fired burners) are operating properly.
- c. Quarterly Routine:
 - i. Grease fan motors, shafts and bearings and inspect fan blades for damage. Check fan clearances, 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 and repair as necessary external components of direct-fired gasifier.
- d. Semi-annual Routine:
 - i. Verify accuracy of the temperature measurement systems. Repair or replace components as necessary.
 - ii. During cold shutdown of continuous kilns DK3, DK4 and DK5, inspect and repair as necessary all internal components of kilns and direct-fired burners. During this time the continuous kilns DK3, DK4 and DK5 and burners 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 log/checklist 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.

3.4 Equipment SIP Rule Standards

Amended Conditions

- 3.4.1 The Permittee shall not cause, let, suffer, permit or allow the emission of fly ash and/or other particulate matter from boilers (B-1 and B-2) in amounts equal to or exceeding the allowable rate derived from $P=0.5(10/R)^{0.5}$; where P equals the allowable weight of emissions of fly ash and/or other particulate matter in pounds per million BTU heat input and R equals the heat input of fuel-burning equipment in million Btu per hour. **This condition is null and void after removal of the boilers B-1 and B-2 from the facility.**
[391-3-1-.02(2)(d)2(ii)]
- 3.4.2 The Permittee shall not cause, let, suffer, permit or allow the emission from wood-fired boilers (B-1 and B-2), visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. **This condition is null and void after removal of the boilers B-1 and B-2 from the facility.**
[391-3-1-.02(2)(d)3.]
- 3.4.3 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in the wood-fired boilers (B-1 and B-2) **or in the direct-fired continuous drying kiln burners DK-3, DK-4 and DK-5. For boilers B-1 and B-2 this condition will be null and void after their removal from the facility.**
[391-3-1-.02(2)(g)]
- 3.4.4 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the drying kilns (DK-1, DK-2, DK-3, DK-4, and DK-5) particulate matter in total quantities equal to or exceeding the allowable rate derived from $E = 4.1 P^{0.67}$; where E equals the emission rate in pounds per hour and P equals the process input weight rate in tons per hour. **For drying kilns DK-1 and DK-2 this condition will be null and void after their removal from the facility.**
[391-3-1-.02(2)(e)1(i)]
- 3.4.6 The Permittee shall not cause, let, suffer, permit or allow emissions from any drying kiln (DK-1, DK-2, DK-3, DK4, and DK-5) and the planer mill (PLN1) the opacity of which is equal to or greater than forty (40) percent. **For drying kilns DK-1 and DK-2 this condition will be null and void after their removal from the facility.**
[391-3-1-.02(2)(b)1]
- 3.4.7 The Permittee shall shutdown boilers B-1 and B-2 before January 31, 2017.
[PSD avoidance for PM]
- 3.4.8 The Permittee shall take all reasonable precautions to prevent dust from becoming airborne including, but not limited to, the application of water or other suitable chemicals to control fugitive dust from plant roads. The percent opacity from any fugitive dust source shall not equal or exceed 20 percent.
[391-3-1-.02(2)(n)]
- 3.4.9 Condition deleted.

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements**New 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)]

4.2 Specific Testing RequirementsAmended Condition

- 4.2.1 The Permittee shall, conduct performance tests for Particulate Matter (PM) and visible emissions from each of the wood-fired-boilers (B-1 and B-2) at 24-month intervals. The tests shall be conducted at the maximum anticipated production rate. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing. Should the PM emissions for a boiler be less than fifty (50) percent of the applicable emissions limitations contained in Condition 3.4.1, the Permittee may request that testing be conducted at 48-month intervals. **This condition shall be null and void after removal of boilers B-1 and B-2 from the facility.**
[391-3-1-.02(2)(a)3]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**Amended Conditions

5.2.1 The Permittee shall perform checks of the visible emissions from each boiler multiclone (BC-1 and BC-2). Checks shall be daily, for each day or portion of each day of operation. The Permittee shall retain a record in a visible emissions (VE) log, suitable for inspection or submittal. The checks shall be conducted using the procedure below except when atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Any operational day when atmospheric conditions or sun position prevent a daily reading shall be reported as monitor downtime in the VE log. **For boilers B-1 and B-2 this condition shall be effective until the boilers are removed from service.**
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. The person performing the determination shall stand at a distance of at least 15 feet, which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.
- b. The person performing the determination shall be Method 9 certified and the determination shall cover a period of three minutes. The opacity action level shall be any occurrence of visible emissions that is equal or greater than 20 percent. The Permittee shall determine the cause of the visible emissions and correct any operational problems in the most expedient manner possible. The Permittee shall maintain a written log defining the cause of any occurrence of visible emissions equal to or greater than the opacity action level and corrections made. The log shall be maintained in a form suitable for inspection or submittal to the Division.

5.2.2 The Permittee shall perform the following applicable operation and maintenance checks and retain a record suitable for inspection or submittal, for each week or portion of each week of operation of the boilers (B-1 and B-2) controlled by Multiclones BC-1 and BC-2 and the planer mill shavings bin controlled by Cyclone PLC-1. A checklist or other similar log may be used for this purpose:

- a. Check exterior for holes in the body or evidence of malfunction in the interior of each multiclone/cyclone.
- b. Check hopper for bridging and plugging.
- c. Check particulate catch transfer device for proper operation to ensure dust emissions do not occur during transfer.

Title V Permit Amendment

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. **For boiler multiclones BC-1 and BC-2, this condition is effective until the boilers are removed from service.**

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

- 5.2.3 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 each multiclone (BC-1 and BC-2) and Cyclone (PLC1), which controls emissions from Boilers B-1 and B-2, and Planer Mill PLN1, respectively. Data shall be recorded at least once per day. **For the boiler multiclones BC-1 and BC2 the pressure drops needs to be monitored until the boilers are removed from service.**

Within 120 days after the issuance of this permit, the Permittee shall establish a normal operating range for each pressure drop. Data acquired by the pressure drop monitors required in the preceding paragraph shall be used to establish the normal pressure drop range for each multiclone. The Permittee shall submit for acceptance by the Division, a report consisting of the pressure drop readings, the range established as the normal pressure drop, and a description of the procedures used to establish the range.

- 5.2.4 The following pollutant specific emission unit(s) (PSEU) is subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
Boiler B-1	PM
Boiler B-2	PM
Planer Mill PLN1	PM

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9.

This condition applies to boilers B-1 and B-2 until the boilers are removed from service.

[40 CFR 64]

Title V Permit Amendment

Interfor U.S., Inc. – Preston Mill

Permit No.: 2421-307-0001-V-04-3

- 5.2.5 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from Boilers B-1 and B-2. **This condition is effective until the boilers are removed from service.**

[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Pressure drop	Indicator No. 2 Visible Emissions
A. Data Representativeness [64.3(b)(1)]	Pressure drop across each multiclone measured by a pressure monitor with accuracy of ± 1 inch water gauge over operating range.	Measurements are made at the emission point. Visible emissions from multiclones will be checked.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	Installed per manufacturer's recommendation.	Not applicable.
C. QA/QC Practices and Criteria [64.3(b)(3)]	Pressure drop monitor is calibrated quarterly.	See Condition 5.2.1a.
D. Monitoring Frequency [64.3(b)(4)]	Pressure drop is recorded at least once per day.	A daily check, when weather permits.
Data Collection Procedures [64.3(b)(4)]	Daily recording to electronic/paper.	By observation of a Method 9 certified reader.
Averaging Period [64.3(b)(4)]	Not applicable.	Not applicable.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Amended 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)(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)
 - i. 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. None required to be reported in accordance with Condition 6.1.4.
- 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 visible emissions from any multiclone (BC-1 and BC-2) that is equal to or greater than 20 percent and which occurs for two consecutive determinations as required by Condition 5.2.1.
 - ii. Any adverse condition discovered by the weekly inspections of the multiclones/cyclone (BC-1, BC-2, and PLC1).
 - iii. Any pressure drop across multiclones (BC-1 and BC-2) and cyclone (PLC1), which is outside the range established for that multiclone/cyclone per Condition 5.2.3. Excursion for boiler multiclones BC-1 and BC-2 are valid until the respective boiler shutdown.

Title V Permit Amendment

- iv. Any problem discovered during the inspections in Condition 3.3.5 that is not corrected within 48 hours of discovery.

Excursion for boiler multiclones BC-1 and BC-2 are valid until they are removed from the facility.

6.2 Specific Record Keeping and Reporting Requirements

Amended Condition

- 6.2.2 The Permittee shall retain operational records of the boilers (ID Nos. B-1 and B-2). These records shall be available for inspection or submittal to the Division upon request and contain the quantity of wood waste or other fuel combusted monthly. These records shall be maintained in an order suitable for inspection or submittal to the Division upon request for a period of five years from the date of record. **This condition is valid till the boilers B-1 and B-2 are removed from the facility.**
[391-3-1-.02(6)(b)1(i); 40 CFR 60 (Subpart Dc) 60.48(c)(g)]
- 6.2.4 The Permittee shall submit to the Division the following notifications, as applicable: **This condition is valid till the boilers B-1 and B-2 are removed from the facility.**
[40 CFR 63.7545]
- a. Notifications specified in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) by the dates specified, as applicable.
 - b. A Notification of intent to conduct a performance test at least 60 days before the required performance test is scheduled to begin.
 - c. A Notification of Compliance Status for each boiler according to 40 CFR 63.9(h)(2)(ii) if an initial compliance demonstration as specified in 40 CFR 63.7530 is required. The Notification of Compliance Status, including all performance test results and fuel analyses, shall be submitted before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boilers at the facility according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the following information, as applicable. If an initial compliance demonstration as specified in 40 CFR 63.7530(a) is not required, the Notification of Compliance Status must only contain the information specified in subparagraphs (e)(i) and (viii).
 - i. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the Permittee or the EPA through a petition process to be a non-waste under 40 CFR 63.241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 63.241.3 and justification for the selection of fuel(s) burned during the compliance demonstration.

- ii. Summary of the results of all performance tests and fuel analyses, and calculations conducted to demonstrate initial compliance including all established operating limits, and including:
 - (A) Identification of whether the affected boiler(s) is complying with the PM emission limit or the alternative TSM emission limit.
 - (B) Identification of whether the affected boiler(s) is complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.
- iii. A summary of the maximum CO emission levels recorded during the performance test to show that the affected boiler(s) has met any applicable emission standard in Tables 1, 2, or 11 through 13 to 40 CFR Part 63, Subpart DDDDD as amended on January 31, 2013, if a CO CEMS is not used to demonstrate compliance.
- iv. Identification of whether planning to demonstrate compliance with each applicable emission limit through performance testing, a CEMS, or fuel analysis.
- v. Identification of whether planning to demonstrate compliance by emissions averaging and identification of whether planning to demonstrate compliance by using efficiency credits through energy conservation. If planning to demonstrate compliance by emission averaging, report the emission level that was being achieved or the control technology employed on January 31, 2013.
- vi. A signed certification that all applicable emission limits and work practice standards have been met.
- vii. A description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report if there was a deviation from any emission limit, work practice standard, or operating limit.
- viii. In addition to the information required in 40 CFR 63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (A) “This facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi).”

Title V Permit Amendment

- (B) “This facility has had an energy assessment performed according to 40 CFR 63.7530(e).”
 - (C) Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: “No secondary materials that are solid waste were combusted in any affected unit.”
- ix. If operating a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to 40 CFR Part 63, Subpart DDDDD, and intending to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the Permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the following information:
- (A) Company name and address.
 - (B) Identification of the affected unit.
 - (C) Reason of unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.
 - (D) Type of alternative fuel intended to use.
 - (E) Dates when the alternative fuel use is expected to begin and end.
- x. If intending to commence or recommence combustion of solid waste, the Permittee must provide 30 days prior notice of the date upon which the combustion of solid waste will commence or recommence. The notification must identify:
- (A) The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice.
 - (B) The currently applicable subcategories under 40 CFR Part 63, Subpart DDDDD.
 - (C) The date on which the affected unit(s) became subject to the currently applicable emission limits.
 - (D) The date upon which combusting solid waste will commence.

- xi. If switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, the Permittee must provide notice of the date of the fuel switch or the physical change within 30 days of the switch/change. The notification must identify:
 - (A) The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490, the location of the source, the boiler(s) that has switched fuels, were physically changed, and the date of the notice.
 - (B) The currently applicable subcategory under this subpart.
 - (C) The date upon which the fuel switch or physical change occurred.
- 6.2.5 The Permittee shall submit the following notification within 15 days of completion:
- i. Complete commissioning (direct-fired burner usage) for DK-3.
 - ii. Complete commissioning (direct-fired burner usage) for DK-4.
 - iii. Complete commissioning (direct-fired burner usage) for DK-5.

APPENDIX B

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD

Title V Permit Amendment

Interfor U.S., Inc. – Preston Mill

Permit No.: 2421-307-0001-V-04-3

May 16, 2016

Mr. Manny Patel
Georgia Environmental Protection Division
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

RE: *Interfor U.S. Inc. - Preston Mill*
PSD Permit - Comments on Draft Permit No. 2421-307-0001-V-04-2

Dear Mr. Patel:

Interfor U.S. Inc. (Interfor) is providing the following comments on the draft PSD Permit No. 2421-307-0001-V-04-2 issued by the Georgia Environmental Protection Division (EPD) on May 6, 2016 for the Preston Mill. The updated PSD permit application (EPD Application No.40720) was submitted March 28, 2016. The public comment period for the draft permit commenced on May 12, 2016, and concludes on June 12, 2016.

The following sections outline Interfor's comments during this public comment period including requested changes to the draft PSD permit. Specific permit condition language requested to be removed is identified in strikethrough text, and added language is identified in bold italic text. The MS Word® version of the draft permit provided by EPD with requested changes identified in Track Changes will be provided separately, via email to EPD.

Equipment Federal Rule Standards

Permit Condition 3.3.4

The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters", and all applicable provisions of 40 CFR Part 63, Subpart A - "General Provisions" as indicated in Table 10 to 40 CFR Part 63, Subpart DDDDD amended on January 31, 2013 and January 21, 2015. In particular, the Permittee shall comply with all the applicable emissions limits and work practice standards of 40 CFR Part 63, Subpart DDDDD by the applicable compliance date specified below; some of the submittal may be due earlier than the compliance date. This condition is null and void if boilers B-1 and B-2 are removed from the facility or January 31, 2017 whichever occurs first:

Interior requests that "*or January 31, 2017 whichever occurs first*:" be removed for consistency with other permit condition references included in the draft permit. One of the primary reasons for the kiln conversion changes is for the removal of these two boilers (prior to the extended Boiler MACT compliance date for the existing kilns).

Intorfor U.S. Inc.	700 Westpark Drive, Suite 100	tel (770) 282-3260	interfor corn
	Peachtree City, GA 30269	tax: (770) 486-6837	

Permit Condition 3.3.5.a.i

The lumber kiln drying operation target final moisture content will be 12% or greater based on a 12-month rolling average. Moisture content will be measured with a moisture meter at the ~~infeed~~-**outfeed** of the planer mill on a daily basis.

Interior currently has a moisture monitor on the outfeed of the planer mil. Therefore, Interior requests EPD accepts the use of this existing monitor for ensure designed drying by the kilns by replacing the infeed measurement with the existing outfeed measurement for providing the same reasonable assurance to EPD as with this condition.

Equipment SIP Rule Standards

Permit Condition 3.4.7

D 1 and D 5.

Interfor intends to complete the kiln conversion projects over different phases starting during the 3rd quarter in 2016, and completed by January 31, 2017. During this phased conversion project, steam/heat from the boilers (B-1 and B-2) will continue to be used during the commissioning periods for continuous kiln conversions of DK-3, DK-4, and DK-5 before the direct-fired kiln burners are fully operational (only units providing heat to aforementioned kilns). For PSD pollutants, including PM, Interfor expects no increase in emissions during this commissioning period due to the boilers providing steam/heat needs only due to the burners not yet operational at the Preston Mill. Therefore, Interfor requests the removal of Condition 3.4.7 from the final permit.

Interfor requests notification requirements to EPD to identify when each continuous kiln commissioning period is completed (and only direct-fired burner is utilized). See proposed Condition 6.2.5.

Specific Monitoring Requirements

Permit Condition 5.2.5

*The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from Boilers B-1 and B-2. **This condition is effective until the boilers are removed from service***

Interfor requests that "or until January 31, 2017 whichever occurs first" is removed for consistency with other conditions for boilers removal from operation at the Preston Mill.

General Record Keeping and Reporting Requirements

Permit Condition 6.1.7.c.iv

Any problem discovered during the inspections in Condition 3.3.5 that is not corrected within 48 hours of discovery.

Interior requests EPD includes the following (in bold font below) for Condition 6.1.7.c.iv:

Excursion for boiler multiclones BC-1 and BC-2 are valid until their removal from the facility.

Specific Recordkeeping and Reporting Requirements

Permit Condition 6.2.4

The Permittee shall submit to the Division the following notifications, as applicable:

This condition is valid till the boilers B-1 and B-2 are removed from the facility or until January 31, 2017 whichever occurs first.

Interior requests that "or until January 31, 2017 whichever occurs first" is removed for consistency with other conditions for boilers removal from operation at the Preston Mill.

Permit Condition 6.2.5

Interfor proposes Permit Condition 6.2.5 to include the following additional requirements:

6.2.5 The Permittee shall submit to the Division the following notifications, within 15 days of completion:

- i. Complete commissioning (direct-fired burner usage only) for DK-3.*
- ii. Complete commissioning (direct-fired burner usage only) for DK-4.*
- iii. Complete commissioning (direct-fired burner usage only) for DK-5.*