

Facility Name: **Georgia-Pacific Wood Products LLC – Warrenton Lumber Facility**
City: Warrenton
County: Warren County
AIRS #: 04-13-301-00003

Application #: TV-508243
Date Application Received: November 5, 2020
Permit No: 2421-301-0003-V-05-0

Program	Review Engineers	Review Managers
SSPP	Eddie Gomez	Jeng-Hon Su / Hamid Yavari
ISMU	Bob Scott	Dan McCain
SSCP	Fred Francis	Sean Taylor
Toxics	N/A	N/A
Permitting Program Manager		Stephen Damaske

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: Georgia-Pacific Wood Products LLC – Warrenton Lumber Facility

2. Parent/Holding Company Name

Georgia-Pacific Corporation

3. Previous and/or Other Name(s)

Georgia-Pacific Corporation – Chip-N-Saw Division-Warrenton (until December 2006)

4. Facility Location

331 Thomson Highway NE, Warrenton, Georgia 30828 (Warren County)

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

Warren County is in attainment for all criteria 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 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 Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2421-301-0003-V-04-0	May 16, 2016	Renewal Title V Permit
2421-301-0003-V-04-1	September 13, 2018	Prevention of Significant Deterioration (PSD) – construction of two direct-fired continuous drying kilns.
2421-301-0003-V-04-2	May 21, 2020	Updating the equipment list to reflect the “as built design” of the facility and inclusion of a PSD avoidance limit for Planer Mill (300).
2421-301-0003-V-04-3	January 4, 2021	Replacement of an existing natural gas boiler.

D. Process Description

1. SIC Codes(s)

2421 – Sawmills and Planing Mills – General

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. Byproducts from the mill are sawdust, bark, and wood shavings.

3. Overall Facility Process Description

Log Preparation and Sawmill:

Operations at the Warrenton Lumber facility begin with the delivery of logs and plywood cores to the storage area (log crane or dry log deck). Logs taken from the storage area or directly off the log trucks will be debarked (101) and cut to length within the log bucking process (102) before being routed through the sawmill (103). The sawmill produces dimensional lumber from debarked logs with specialized equipment. The green (wet), rough lumber may be sold or transferred to another mill, but most of the green lumber is sent to the lumber drying kilns.

By-Product Processing:

Green wood by-products from the log preparation and sawmill consist of bark, sawdust, and chips. Bark is sold off-site. Green sawdust from various points in the process is conveyed either to the sawdust fuel silos (204A and 205A) to be used as fuel in sawdust gasifier burners in the continuous kilns (204 and 205) or to the sawdust truck loading station (105B). Green chips are sold and shipped off-site via rail or truck.

Lumber Drying Kilns:

The rough green lumber produced by the sawmill is stacked. Then it is dried in one of four lumber drying kilns (203, 204, 205, and 206). Batch kiln No. 3 (203) is an indirect-heated batch kiln that uses steam supplied by the natural gas package boiler (400C). Continuous drying kiln No. 4 and No. 5 (204 and 205) are direct-heated kilns equipped with a 40 MMBtu/hr. sawdust gasifier burner. Continuous drying kiln No. 6 (206) is a direct-heated continuous lumber drying kiln equipped with a 40 MMBtu/hr. natural gas burner. Once dried, the lumber is cooled prior to sending to the planer mill.

Planer Mill:

The dried rough lumber is planned and finished in the planer mill, sorted, and packaged by length, size, and grade, and transported by truck for delivery to the customer. Dry planer shavings are wood by-products from planing the lumber. Dry shavings are sold and shipped off-site.

Utilities:

A natural gas package boiler (400C) with a capacity of 32.16 MMBtu/hr. provides steam for the indirect-heated lumber drying kiln (203).

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Georgia-Pacific Warrenton is in an attainment area. Because the Carbon Monoxide (CO) and Volatile Organic Compound (VOC) potential to emit (PTE) values are more than 250 tons per year, the facility is a major source under PSD and NSR regulations.

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 GHGs	✓			✓

3. MACT Standards

This facility is subject to 40 CFR 63, Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.” The drying kilns at the facility are subject to this rule.

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

Not applicable

C. Compliance Status

None applicable

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements**A. Equipment List for the Process**

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
400C	Natural Gas Package Boiler 32.16 MMBtu/hr., 129 MM cubic feet/yr.	40 CFR 52.21 PSD/BACT 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	None	None
203	Drying Kiln No. 3 Indirect Steam Heated Batch Kiln 1976 33 million board feet per year (MMBF/yr.)	40 CFR 52.21 PSD/BACT 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	None	None
204	Drying Kiln No. 4 Direct-Fired Dual Path Continuous Kiln 2016 131.5 MMBF/yr. with up to 40 MMBtu/hr. heat input 40 MMBtu/hr. sawdust burner with fuel oil startup	40 CFR 52.21 PSD/BACT 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)	None	None
205	Drying Kiln No. 5 Direct-Fired Dual Path Continuous Kiln 2020 131.5 MMBF/yr. with up to 40 MMBtu/hr. heat input 40 MMBtu/hr. sawdust burner with fuel oil startup	40 CFR 52.21 PSD/BACT 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)	None	None
206	Drying Kiln No. 6 Direct-Fired Dual Path Continuous Kiln 2019 131.5 MMBF/yr. with up to 40 MMBtu/hr. heat input 40 MMBtu/hr. natural gas burner	40 CFR 52.21 PSD/BACT 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g)	None	None
204A 205A	Sawdust Fuel Silo Nos 1 & 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	SDC1 SDC2	Cyclones
105B	Sawdust Conveying and Loading 2015	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	SC2	Cyclone
300	Planer Mill with Planer Hog 2015	40 CFR 52.21 PSD/BACT GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	PMCF	Cyclofilter

* 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.

B. Equipment & Rule Applicability

New Source Performance Standards (NSPS)

NSPS Subpart A requires initial notification and performance testing, recordkeeping and monitoring and provides reference methods and mandates general control device requirements for all other subparts as applicable. The natural gas boiler (400C) is subject to all applicable requirements of NSPS Subpart Dc. Subpart Dc does not contain any Particulate Matter (PM) or Sulfur Dioxide (SO₂) emission standards for boilers that burn 100% natural gas, and since PM and SO₂ are the only pollutants regulated under Subpart Dc, there are no emissions limits that apply. Georgia Pacific Warrenton is required to maintain monthly records of the amount of natural gas used according to 40 CFR 60.48c(g)(2).

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

Georgia Pacific Warrenton is a major source of Hazardous Air Pollutants (HAP). Thus, 40 CFR 63 Subpart A (General Provisions) requires notification, performance testing, recordkeeping, and monitoring. The rule provides reference methods and mandates general control device requirements for all other subparts as applicable.

The facility is subject to the Plywood and Composite Wood Products (PCWP) Maximum Available Control Technology (MACT) standard, 40 CFR 63, Subpart DDDD (4D). This rule applies to any PCWP manufacturing facility located at a major source of HAP emissions. Lumber kilns are within the affected sources under the PCWP MACT pursuant to 40 CFR 63.2232(b); therefore, the lumber kilns are subject to this rule. However, no control requirements are specified by the rule for either existing or new/reconstructed lumber kilns, so this project will not change the applicability of PCWP MACT to the mill.

Boiler MACT: The permittee complies with the applicable requirements for the manufactured year of the natural gas boiler (400C).

Federal Rule – 40 CFR 64 – Compliance Assurance Monitoring (CAM)

Under the general applicability criteria, this regulation applies to units that use a control device to achieve compliance with an emission limit and whose pre-controlled emissions levels exceed the major source thresholds under the Title V permitting program. The natural gas-fired boiler (400C) does not have a control device and is not subject to CAM.

The drying kilns are subject to PSD and Best Available Control Technology rules (BACT) for VOC. Emission and Operating Caps:

The Planer Mill (300) contains a PSD avoidance limit for PM₁₀ of 7,500 hours of operation per year. The Planer Mill typically operates less than 6,000 hours per year.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(b)1. limits the opacity of emissions from Georgia Pacific Warrenton's emission units to forty (40) percent.

The equipment is also subject to Georgia Rule (e) for PM emissions. Since particulate matter (PM) emissions generated from the Sawdust Fuel Silo Nos 1 & 2 (ID Nos. 204A and 205A) and the Sawdust Conveying and Loading (ID No. 105B) are controlled by the cyclones (ID Nos. SDC1, SDC2, and SC2), it is believed that PM emissions from the sawdust fuel silo and conveying and loading system are minimal. Compliance with Rule (b) and Rule (e) is expected.

Georgia Rule (d) for opacity and PM emissions applies to the natural gas fired boiler.

Rule (g), the sulfur content limit rule, applies to sources firing natural gas fuel. Under this rule, the sulfur content of the fuel is limited to 2.5% by weight. Natural gas has negligible sulfur and would always comply with Rule (g).

C. Permit Conditions

Condition 3.2.1 limits the drying kilns to 394.5 MMBF/yr. The Division is using updated National Council for Air and Stream Improvement (NCASI) VOC emission factors. Therefore, the VOC emission factor specified in existing Condition 3.2.1 is outdated; therefore, it is removed from the permit.

Existing Condition 3.2.2 of Title V Permit No. 2421-301-0003-V-04-0 was deleted in Permit Amendment No. 2421-301-0003-V-04-1 because batch Kiln 202 was shut down and the BACT limit for Kiln 203 has been replaced by existing Condition 3.2.3 (Condition 3.2.2 of the proposed Title V renewal permit.)

New Condition 3.2.2 limits the board feet of lumber that can be dried by the batch drying kiln, Kiln 203, to 33 million board feet of lumber during any twelve consecutive months. The Division is using updated National Council for Air and Stream Improvement (NCASI) VOC emission factors. Therefore, the VOC emission factor specified in existing Condition 3.2.2 is outdated; therefore, it is removed from the permit.

Condition 3.2.3 limits the amount of natural gas burned in the natural gas boiler (400C) to 129 million cubic feet of natural gas during any twelve consecutive months. Because the Division received notification of the startup of continuous drying Kilns 205 and 206 on March 12, 2020, the reference to Condition 3.2.3 being dependent on the startup of those kilns has been removed.

Condition 3.2.4 limits operation of the Planer Mill to 7,500 hours per year for the PSD avoidance limit on PM₁₀ emissions.

Condition 3.3.1 states that all drying kilns are subject to NESHAPS Subparts A and 4D, the plywood and composite wood product MACT.

Condition 3.3.2 states that the natural gas-fired boiler is subject to all applicable provisions of the boiler MACT (40 CFR 63 Subparts A and 5D). Because the scheduled removal of this boiler was cancelled in Permit Amendment No. 2421-301-0003-V-04-1, reference to dependence of the boiler being on site was taken out of Condition 3.3.2.

Condition 3.3.3 states that the natural gas-fired boiler is subject to all applicable provisions of the boiler NSPS (40 CFR 60 Subparts A and Dc). Because the scheduled removal of this boiler was cancelled in Permit Amendment 2421-301-0003-V-04-1, reference to dependence of the boiler being on site was taken out of Condition 3.3.3.

Existing Condition 3.3.4 required the Permittee to construct both continuous kilns per the PSD permit application. Because the Division received notification of startup of these kilns by March 12, 2020, existing Condition 3.3.4 is no longer necessary and has been removed from the permit.

Existing Condition 3.3.5 stated that EPD's approval to construct the continuous kilns was good for only 18 months from the time PSD permit 2431-301-0003-V-03-2 was issued, if construction was not paused/interrupted for more than 18 months, and that each phase of the proposed expansion must commence within 18 months of the projected and approved commencement date. Because the Division received notification of startup of these kilns by March 12, 2020, existing Condition 3.3.5 is no longer necessary and has been removed from the permit.

New Condition 3.3.4 includes the MACT DDDDD tune-up requirements for the natural gas boiler (400C). Because the Division found that the initial tune up and related maintenance had been conducted by February 8, 2021, new Condition 3.3.4 requires subsequent tune-ups every five years.

Condition 3.4.1 limits visible emissions from sources other than the boilers to 40% per Georgia Rule (b).

Condition 3.4.2 limits the PM emissions from the sawmills, the drying kilns, and the planer mills per Georgia Rule (e).

Condition 3.4.3 contains the PM and opacity limits for boiler (400C) (the natural gas-fired boiler) per Georgia Rule (d)2 and d(3).

Condition 3.4.4 restricts the fuel of the natural gas fired boiler (400C), to natural gas.

Condition 3.4.5 is the standard fugitive dust condition, which requires the Permittee to minimize fugitive emissions.

Condition 3.4.6 limits opacity of fugitive emissions to 20% per Georgia Rule (n)2.

Condition 3.4.7 limits the sulfur content of the wood-waste to 2.5% by weight by Georgia Rule (g)2. This applies to the dryer burners of the continuous drying kilns 204, 205, and 206.

Condition 3.5.1 contains the boiler VOC BACT limit of 0.004 lb./MMBtu of heat input for the natural gas-fired boiler (400C). Because the scheduled removal of this boiler was cancelled in Permit Amendment 2421-301-0003-V-04-1, reference to such removal was taken out of Condition 3.5.1.

Condition 3.5.2 sets requirements for the sawdust fuel silo (204A and 204B) control devices, cyclones SDC1 and SDC2, and the sawdust conveying and loading cyclone (SC2).

Condition 3.5.3 requires the Permittee to develop and implement a Work Practice and Preventive Maintenance Program for the Lumber Drying Kilns (204, 205 and 206). Because the Division received notification of the startup of continuous drying Kilns 205 and 206 on March 12, 2020, the reference to Condition 3.5.3 being dependent on startup of those kilns has been removed.

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 permittee to keep records of the monthly natural gas consumption in the natural gas-fired boiler (400C) per the requirements of NSPS Subpart Dc. Because the scheduled removal of this boiler was cancelled in Permit Amendment 2421-301-0003-V-04-1, reference to such removal was taken out of Condition 5.2.1.

Condition 5.2.2 includes the MACT DDDDD tune-up monitoring requirements for the natural gas boiler (400C).

C. Compliance Assurance Monitoring (CAM)

Condition 5.2.3 stated that the wood-fired boiler 400B was subject to CAM for PM. Because the facility received notification that the wood waste fired boiler (ID No. 400B) had shut down with the startup of the natural gas fired boiler (400C) on August 29, 2016, Condition 5.2.3 and its CAM requirements were removed.

Condition 5.2.4 identified the CAM indicator parameters as the visual inspection of the boiler multiclones and the total secondary power of the boiler Electrostatic Precipitator (ESP). Because the facility received notification that the wood waste fired boiler (ID No. 400B) had shut down with the startup of the natural gas fired boiler (400C) on August 29, 2016, Condition 5.2.4 and its CAM requirements were removed.

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.

Condition 6.1.7.b.i requires reporting of exceedances of the batch Kiln 203 operating limit of 33 MMBF. Because the Division received notification of the startup of continuous drying Kilns 205 and 206 on March 12, 2020, the reference to Condition 6.1.7.b.i. being dependent on startup of those kilns has been removed.

Condition 6.1.7.b.ii requires reporting of exceedances of the operating limit of 394.5 MMBF for total lumber dried in kilns 203, 204, 205 and 206.

Condition 6.1.7.b.iii requires reporting of exceedances of the natural gas boiler (400C) operating limit of 129 million cubic feet. Because the Division received notification of the startup of continuous drying Kilns 205 and 206 on March 12, 2020, the reference to Condition 6.1.7.b.i. being dependent on startup of those kilns has been removed.

Condition 6.1.7.b.iv requires reporting of exceedances of the Planner Mill 300 operating limit of 7500 hours.

Condition 6.1.7.c.i specifies excursion reporting requirements for the cyclones which control the sawdust fuel silos (204A and 204B).

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires Permittee to maintain records of the natural gas consumption each month in the natural gas-fired boiler (400C) per NSPS Subpart Dc. Because the scheduled removal of this boiler was cancelled in Permit Amendment 2421-301-0003-V-04-1, reference to such removal was taken out of Condition 6.2.1.

Condition 6.2.2 requires the Permittee to maintain monthly records of the amount of the dried lumber processed through the batch Kiln 203, continuous Kiln 204, continuous Kiln 205, and continuous Kiln 206. This is necessary to confirm compliance with the production limits in Conditions 3.2.1 and 3.2.2.

Condition 6.2.3 requires the Permittee to maintain 12 consecutive months total of lumber dried in batch Kiln 203, continuous Kiln 204, continuous Kiln 205, and continuous Kiln 206, using the monthly records required in Condition 6.2.2.

Condition 6.2.4 requires the Permittee to submit semi-annual reports of the 12-consecutive month totals of lumber dried (in million board feet) batch Kiln 203, continuous Kiln 204, continuous Kiln 205, and continuous Kiln 206 by August 29 of the calendar year of record and by February 28 of the year following the calendar year of record.

Condition 6.2.5 requires the Permittee to notify the Division in writing if the production from batch drying Kiln 203 exceeds 2.75 MMBF during any calendar month. It also requires the Permittee to notify Division if the natural gas consumption in the natural gas boiler (400C) exceeds 10.750 million cubic feet during any calendar 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 maintain compliance with the production limits in Condition 3.2.2 and 3.2.3.

Condition 6.2.6 requires the Permittee to notify the Division in writing if the production from all drying Kilns exceeds 32.87 MMBF during any calendar month. Because the Division received notification of the startup of continuous drying Kilns 205 and 206 on March 12, 2020, the reference to Condition 6.2.6 being dependent on startup of those kilns has been removed.

Condition 6.2.7 requires the Permittee to track the monthly hours of operation for the Planer Mill (300). It also requires the Permittee to report any monthly operation of the Planer Mill in excess of 625 hours.

Condition 6.2.8 contains 5-year compliance report requirements per MACT DDDDD. Because the postmark date requirements in this rule were changed from August 29th to July 31st, and from February 28th to January 31st respectively on November 20, 2015, Condition 6.2.8 has been updated to reflect the new deadlines.

Condition 6.2.9 specifies what information must be included within the 5-year compliance reports required by MACT DDDDD.

Condition 6.2.10 includes the MACT DDDDD requirement that notifications, reports, performance tests, and other related records required by MACT DDDDD be kept by the facility for five (5) years.

Existing Condition 6.2.11 contained the initial notification of compliance status for the natural gas boiler (400C), per MACT DDDDD. Because the Division received this notification on October 20, 2016, existing Condition 6.2.11 has been removed.

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

A mobile wood grinder will be brought on site four or five times per year for use up to a week each time.

E. Short-Term Activities

Operation of a portable wood grinder four or five times each year for operation up to a week each time.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

Emissions trading is not applicable to the facility.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Not applicable.

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 July 21, 2021, and ended on August 20, 2021. Comments were not received by the Division.