



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Georgia-Pacific Wood Products, LLC (Madison Plywood)

Facility Address: 1400 Woodkraft Road
Madison, Georgia 30650 Morgan County

Mailing Address: 1400 Woodkraft Road
Madison, Georgia 30650

Parent/Holding Company: Georgia-Pacific Wood Products, LLC

Facility AIRS Number: 04-13-211-00013

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:

The incorporation of the applicable Plywood and Composite Wood Products (PCWP) MACT rule, 40 CFR Part 63, Subpart DDDD changes finalized on August 13, 2020 into the existing Title V operating permit.

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. **2436-211-0013-V-04-0**. Unless modified or revoked, this Amendment expires simultaneously with Permit No. **2436-211-0013-V-04-0**. 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. **591474** dated **August 10, 2021**; any other applications upon which this Amendment or Permit No. **2436-211-0013-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 Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **12** pages.



Richard E. Dunn, 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
3.2	Equipment Emission Caps and Operating Limits	2
3.3	Equipment Federal Rule Standards	2
PART 4.0	REQUIREMENTS FOR TESTING	4
4.1	General Testing Requirements	4
4.2	Specific Testing Requirements	4
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	8
6.2	Specific Record Keeping and Reporting Requirements.....	8

PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The Georgia-Pacific Wood Products, LLC (Madison Plywood) facility is proposing to incorporate the applicable Plywood and Composite Wood Products (PCWP) rule, 40 CFR Part 63 Subpart DDDD changes as finalized on August 13, 2020, into the existing Title V operating permit. The proposed permit updates do not include any physical changes or change to the method of operation for any emission units at the facility and there are no changes to actual or potential throughput or emission rates for any emission units at the facility proposed as part of this application. The facility is seeking to add or revise permit conditions to reflect the rule changes.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS**3.2 Equipment Emission Caps and Operating Limits**

MODIFIED CONDITION

3.2.1 The Hybrid Thermal/Catalytic Oxidizer (ID No. TCO) shall achieve both:

- a. A minimum destruction efficiency of 90% for the captured VOC emissions from the hot zone of the veneer dryers. The 90% destruction efficiency need not be maintained during periods when the dryer(s) are not operating or during previously scheduled startup and shutdown periods (including bakeouts and washouts) and Force Majeure events. These startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these vents, emissions shall be minimized to the greatest extent practicable, and
[United States Vs. Georgia-Pacific Corporation, Civil Action No. 1 96-CV-1818-FMH 40 CFR 63.6(e) and Table 1B of 40 CFR 63 Subpart DDDD]
- b. A reduction in emissions of total HAP, measured as THC (as carbon), by 90% except during safety-related shutdowns conducted according to work practice requirements in Table 3 of 40 CFR 63 Subpart DDDD
[Tables 1B and 3 of 40 CFR 63 Subpart DDDD]

3.3 Equipment Federal Rule Standards

MODIFIED CONDITION

3.3.4 The Permittee shall, at all times except during safety-related shutdowns according to work practice requirements, ~~periods of process unit or control device start, shutdown, and malfunction~~, for the device (TCO) controlling emissions from Veneer Dryers (Emission Unit ID No. 300), achieve a minimum destruction efficiency for the ~~captured~~ total HAP emissions, measured as THC (as carbon), of 90 percent. Methane can be subtracted from THC measurement.
[Subpart DDDD, 40 CFR 63.2250(f) 63.2250(a) and Tables 1B and 3 to 40 CFR 63 Subpart DDDD]

MODIFIED CONDITION

3.3.5 The Permittee shall comply with Work Practice requirements of Item No. 3 in Table 3 of 40 CFR 63, Subpart DDDD at all times except during safety-related shutdowns according to work practice requirements, ~~periods of process unit or control device start, shutdown, and malfunction~~ specified in 40 CFR 63.2241 63.2254 by minimizing fugitive emissions from the veneer dryer doors (through proper maintenance procedures) and from the green end of the Veneer Dryers (Emission Unit ID No 300) through proper balancing of the heated zone exhausts.
[Subpart DDDD, 40 CFR 63.2241(a) 63.2250(a) and Table 3(3) to 40 CFR 63 Subpart DDDD]

Title V Permit Amendment

MODIFIED CONDITION

- 3.3.8 When the veneer dryer control device is operated in catalytic mode, the Permittee shall maintain the minimum 3-hour block average combustion chamber temperature above the minimum temperature set in accordance with the provisions in Condition No. 4.2.8 and check the activity level of a representative sample of the catalyst annually except during the calendar year when a performance test is conducted according to Table 4 to Subpart DDDD. [Subpart DDDD, Table 2(2) to 40 CFR 63 Subpart DDDD]

DELETED CONDITION

- ~~3.3.9 At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in paragraph 40 CFR 63.6(e)(3)), review of operation and maintenance records, and inspection of the source.~~
~~[Subpart DDDD, 40 CFR 63.2250(b) and Subpart A, 40 CFR 63.6(e)(1)(i)]~~

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements**

MODIFIED CONDITION

- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:

[a. through n. – no change]

- o. Table 4 to 40 CFR 63 Subpart DDDD(5) through (8)
 - i. Method 25A shall be used for the determination of VOC concentrations. Or, Method 18 shall be used to measure emissions of methane and subtracted from the emissions of total HAP as THC.
 - ii. Method 320, NCASI 99.02, NCASI 105.01, or ASTM D6348-03 (provided that percent R as determined in Annex A5 is equal or greater than 70% and less than or equal to 130%) shall be used to measure emissions of total HAP.
 - iii. NCASI 99.0, NCASI 98.01, NCASI 105.01, Method 320, or Method 308 shall be used for the determination of methanol concentrations.
 - iv. NCASI 105.01, NCASI 99.02, Method 316, Method 320, Method 0011 (EPA SW-846), or NCASI 98.01 or shall be used for the determination of formaldehyde concentrations.

~~The procedures of the NCASI Wood Products Protocol 1 shall be used to determine the VOC emissions from the veneer dryers and/or presses.~~

[p. through r. – no change]

4.2 Specific Testing Requirements

MODIFIED CONDITION

- 4.2.6 If the TCO, ~~which is currently operating in catalytic mode,~~ is reconfigured to operate in thermal mode, a new initial performance test shall be performed. Testing shall be conducted according to procedures of 40 CFR 63.2262, using methods listed in Condition 4.1.3.
[Subpart DDDD, 40 CFR 63.2260(a) and 40 CFR 63.2261(a)]

Title V Permit Amendment

MODIFIED CONDITION

- 4.2.9 The Permittee shall check the activity level of a representative sample of the catalyst bed annually, not to exceed twelve months, to ensure that the catalyst is performing within its design range when the oxidizer is operating in the catalytic mode. The Permittee may forego the annual catalyst activity check during the calendar year when a performance test is conducted in accordance with Table 4 of Subpart DDDD.
[Subpart DDDD, Table 2(2) to 40 CFR 63 Subpart DDDD]

MODIFIED CONDITION

- 4.2.10 Performance tests required by 40 CFR 63 Subpart DDDD ~~the PCWP MACT~~ shall be conducted according to the requirements in 40 CFR 63.7(e)(1), and the requirements in 40 CFR 63.2262(b) through (1) (m), whichever is applicable, using appropriate methods specified in Table 4 of 40 CFR 63 Subpart DDDD ~~the PCWP MACT~~ and Condition No. 4.1.3. The performance tests shall be conducted as follows:
[Subpart DDDD, 40 CFR 63.2262(a) & (b)(1)]

- a. The Permittee must conduct each performance test based on representative operating conditions. Representative operating conditions (40 CFR 63.2292) means operation of a process unit during performance testing under the conditions that the process unit will typically be operating in the future, including use of a representative range of materials (e.g., wood material of a typical species mix and moisture content or typical resin formulation) and representative operating temperature range. Representative operating conditions exclude periods of startup and shutdown. The Permittee may not conduct performance tests during periods of malfunction. The performance test report shall describe representative operating conditions for the process and control systems and explain why they are representative. The Permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions are representative. Upon request, the Permittee shall make available to the Division such records as may be necessary to determine the conditions of performance tests.
[40 CFR 63.2262(a) and (b) (1,2) and 40 CFR 63.7(e)(1)]

~~Tests shall not be conducted during periods of startup, shutdown, malfunction as specified in 40 CFR 63.7(e)(1) and shall test under representative operating conditions as defined in 40 CFR 63.2292. The Permittee shall describe representative operating conditions in the performance test report for the process and control systems and explain why they are representative.~~

[b. – no change]

- c. Sampling sites shall be located at the inlet (if emission reduction testing or documentation of inlet methanol or formaldehyde concentration is required) and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere.
[40 CFR 63.2262(d)(1)]

[d. – no change]

Title V Permit Amendment

Georgia-Pacific Wood Products, LLC (Madison Plywood)

Permit No.: 2436-211-0013-V-04-4

- e. Emissions of an individual HAP may be treated as zero if all three of the performance test runs result in a nondetect measurement, and the method detection limit is less than or equal to 1 parts per million by volume, dry basis (ppmvd). Otherwise, all nondetect data (40 CFR 63.2292) shall be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbon (THC) emission rates.
[40 CFR 63.2262(g)(1) and 40 CFR 63.2262(g)(2)]
- [f. – no change]

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

5.2.14 The Permittee shall, for each temperature monitoring device of the TCO, meet the following requirements:

[Subpart DDDD, 40 CFR 63.2269(b)(1-6)]

[a. through c. – no change]

- d. Validation of the temperature sensor's reading shall be performed at least semiannually using the requirements of 40 CFR 63.2269(b)(4)(i), (ii), (iii), (iv), or (v).

~~Electronic calibrations shall be performed at least semiannually to the applicable procedures in the manufacturer's owner's manual. Following the electronic calibration, the Permittee must conduct a temperature sensor validation check in which a second or a redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30F of the process temperature sensor's reading.~~

- e. Calibration and Validation checks shall be conducted in accordance with Condition 5.2.14.d any time the sensor exceeds the manufacturer's specified maximum operating temperature range or the Permittee ~~shall install~~ a new temperature sensor.

[f. – no change]

MODIFIED CONDITION

5.2.15 The Permittee shall monitor and collect data according to the following requirements:

[Subpart DDDD, 40 CFR 63.2270(b), (c), (d), and (f)]

[a. – no change]

- b. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities nor data recorded during safety-related shutdown, nor control device downtime covered in any approved routine control device maintenance exemption, periods of startup, shutdown, and malfunction shall not be used in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The Permittee must use all the data collected during all other periods in assessing the operation of the control system.

[c. and d. – no change]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.2 Specific Record Keeping and Reporting Requirements**

MODIFIED CONDITION

6.2.6 The Permittee shall follow documented site-specific procedures to cease the flow of raw materials and fuel or process heat and to remove material from the process unit(s) as expeditiously as possible, given the system design, to reduce air pollutant emissions. The Permittee shall keep records that show the work practice requirements are being followed during safety-related shutdowns.

[Subpart DDDD, 40 CFR 63.2250(e) 63.2250(f), 40 CFR 63.2282(a) and Table 3(6) to Subpart DDDD of Part 63]

~~The Permittee shall implement the startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3).~~

MODIFIED CONDITION

6.2.8 The Permittee must submit a Notification of Compliance Status (NOCS) as specified in 40 CFR 63.2281(h), (k) and (l) 40 CFR 63.9(h)(2)(ii) if the Permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 of 40 CFR 63, Subpart DDDD, or a repeat performance test as specified in Table 7 of 40 CFR 63, Subpart DDDD, as follows:

[Subpart DDDD, 40 CFR 63.2280(d), Table 6(3) to 40 CFR 63.2265]

[a. – no change]

- b. For each ~~initial~~ compliance demonstration required in Tables 5, 6, and 7 of 40 CFR 63, Subpart DDDD that includes a performance test conducted according to the requirements in Table 4 of 40 CFR 63, Subpart DDDD, the Permittee must submit the NOCS, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test. ~~according to 40 CFR 63.10(d)(2)~~

Title V Permit Amendment

MODIFIED CONDITION

- 6.2.10 The Permittee shall submit each report, in accordance with the following table (Table 9 of 40 CFR 63, Subpart DDDD), that applies to the Permittee:
[Subpart DDDD, 40 CFR 63.2281(a)]

The Permittee must submit a(n)...	The report must contain...	The Permittee must submit the report...
(1) Compliance report...	The information in 40 CFR 63.2281(c) through (g)	Semiannually according to the requirements in 40 CFR 63.2281(b).
(2) DELETED	DELETED	DELETED
(3) <u>Performance test report</u>	<u>The information required in 40 CFR 63.7(g)</u>	<u>According to the requirements of 40 CFR 63.2281(i).</u>
(4) <u>CMS performance evaluation, as required for CEMS under 40 CFR 63.2269(d)(2)</u>	<u>The information required in 40 CFR 63.7(g)</u>	<u>According to the requirements of 40 CFR 63.2281(i).</u>

MODIFIED CONDITION

- 6.2.11 The Permittee shall submit each report by the date in the table (Table 9 of 40 CFR 63, Subpart DDDD) in Condition No. 6.2.10, and as specified below, unless the Director has approved a different schedule for submission of reports under 40 CFR 63.10(a):
[Subpart DDDD, 40 CFR 63.2281(b)]

[a. through e. – no change]

- f. The Permittee shall submit all subsequent reports following the procedure specified in 40 CFR 63.2281(h), (k) and (l).

MODIFIED CONDITION

- 6.2.12 The Permittee's compliance report required by Condition No. 6.2.11 shall contain the following information:
[Subpart DDDD, 40 CFR 63.2281(c)]

[a. through c. – no change]

- d. The compliance report must include the number of instances and total amount of time during the reporting period in which each of the startup/shutdown work practice requirements in Table 3 of 40 CFR 63, Subpart DDDD (rows 6 through 8) is used in place of the otherwise applicable compliance options, operating requirements, and work practice requirements (in Table 3 of 40 CFR 63, Subpart DDDD rows 1 through 5). If a startup/shutdown work practice in Table 3 of 40 CFR 63, Subpart DDDD (rows 6 through 8) is used for more than a total of 100 hours during the semiannual reporting period, the Permittee must report the date, time, and duration of each instance when that startup/shutdown work practice was used.

~~If there was a startup, shutdown, or malfunction of equipment subject to Subpart DDDD during the reporting period and actions were taken consistent with the SSMP, the compliance report must include the information specified in 40 CFR 63.10(d)(5)(i).~~

Title V Permit Amendment

[e. – no change]

f. DELETED

[g. and h. – no change]

MODIFIED CONDITION

6.2.13 The Permittee must ensure that for each deviation from a compliance option, operating requirement or work practice requirement in Conditions Nos. 3.3.4 and 3.3.5 that occurs at an affected source where the Permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in the PCWP MACT, the compliance report must contain the information in Condition No. 6.2.14.a through f and in Paragraphs a and b below. This includes periods of startup, shutdown, and malfunction. [Subpart DDDD, 40 CFR 63.2281(d)]

- a. The total operating time of each affected source during the reporting period.
- b. Information on the ~~number~~, date, time, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

MODIFIED CONDITION

6.2.14 The Permittee must ensure that for each deviation from a compliance option, operating requirement, or work practice requirement occurring at an affected source where the Permittee is using a CMS to comply with the compliance options and operating requirements in the PCWP MACT, the Permittee must include the information in paragraphs a through e under Condition 6.2.12 and paragraphs a through m below. This includes periods of startup, shutdown, and malfunction and routine control device maintenance. [Subpart DDDD, 40 CFR 63.2281(e)]

~~The Permittee must ensure that operating requirements occurring at an affected source where the Permittee is using a CMS to comply with the compliance options and operating requirements in the PCWP MACT, the Permittee must include the information in paragraphs a through k below.~~

- a. DELETED
- b. The date, time, and duration that each CMS was inoperative, except for zero (low level) and high-level checks.

[c. through k. – no change]

l. For any failure to meet a compliance option in 40 CFR 63.63.2240, including the compliance options in Table 1A or 1B to 40 CFR 63 Subpart DDDD or the emissions averaging compliance option, provide an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.

m. The total operating time of each affected source during the reporting period.

Title V Permit Amendment

MODIFIED CONDITION

6.2.16 The Permittee shall keep the following records:
[Subpart DDDD, 40 CFR 63.2282(a) and Item No. 2, Table 5]

[a. – no change]

b. The records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions, specified in paragraphs (i) through (iv) below.

- i. Record the date, time, and duration of each startup and/or shutdown period, including the periods when the affected source was subject to the standard applicable to startup and shutdown.
- ii. In the event that an affected unit fails to meet an applicable standard, record the number of failures; for each failure, record the date, time, cause and duration of each failure.
- iii. For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, and the following information:
 - a. For any failure to meet a compliance option in 40 CFR 63.2240, including the compliance options in Table 1A or 1B or the emissions averaging compliance option, record an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions.
 - b. For each failure to meet an operating requirement in Table 2 to this subpart or work practice requirement in Table 3, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Division.
- iv. Record actions taken to minimize emissions in accordance with 40 CFR 63.2250(g), and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

~~b. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.~~

~~c. Records of performance test and performance evaluation as required in 40 CFR 63.10(b)(2)(viii).~~

~~e. Records of performance tests, operating parameters during the test and performance evaluations as required in 40 CFR 63.10(b)(2)(vii).~~

Title V Permit Amendment

Georgia-Pacific Wood Products, LLC (Madison Plywood)

Permit No.: 2436-211-0013-V-04-4

MODIFIED CONDITION

- 6.2.20 Records required by Condition No. 6.2.16 shall be maintained for five years after the date of occurrence, measurement, maintenance, corrective action, report or record according to 40 CFR 63.10(b)(1). For the first two years the records must be maintained on site at the facility, for the remaining 3 years, these records can be maintained offsite.

Any records required to be maintained by 40 CFR 63 Subpart DDDD that are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to a delegated air agency or the EPA as part of an on-site compliance evaluation.

[Subpart DDDD, 40 CFR 63.2283]