Facility Name: **Langboard OSB, Quitman**
City: Quitman
County: Brooks
AIRS #: 04-13-02700013

Application #: TV-744362
Date Application Received: April 7, 2023
Permit No: 2493-027-0013-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Langboard OSB

2. Parent/Holding: Langdale Industries

3. Previous and/or Other Name(s): Langboard, Inc.

4. Facility Location: Hwy 84 East, Quitman, GA 31650

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

B. Site Determination

This permit covers the OSB plant constructed in 2005, the details of which are included in Title V permit application No. 15084. Note that the original old OSB plant, which was adjacent and under common control, ceased to operate after the startup of the exiting new plant.

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
2493-027-0013-V-04-0	October 12, 2018	Title V Renewal
Off Permit Change	July 26, 2024	Remove Fuel Storage Bin Vent Baghouse (C002) and install high-efficiency cyclone in its place to operate in emergency (abort) situations.

D. Process Description

1. SIC Codes(s)

2493 Reconstituted Wood Products

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 plant produces oriented strand board (OSB).

3. Overall Facility Process Description

Mixed pine and a limited amount of southern hardwoods are received by truck, debarked, flaked, conveyed to wet flake metering bins and dried. The facility includes two single-pass rotary flake dryers (Source ID Nos. P003 and P004), each with a maximum input rate of 75,000 pounds per hour (lb/hr). Heat for the dryers is provided by one of two wood fired furnaces (Source ID Nos. P001 and P002). The heat input capacity of each Energy System is 160 million British thermal units per hour (MMBtu/hr). The Energy Systems combust primarily wood bark, up to 33,230 lb/hr, and are controlled by an electrostatic precipitator (ESP) and NOx Abatement System. The Energy Systems receive exhaust gases from the dryers, board press (Source ID No. P008) and blenders (Source ID No. P006) for reduction of VOC emissions.

Once the flakes have reached the desired moisture content in the dryers, they are collected, screened for fines removal (Source ID No. P005) and conveyed to blender metering bins. Particulate Matter (PM) emissions from handling are controlled by baghouse (Source ID No. C004). The flakes are mixed with wax and phenol-formaldehyde resin in the blenders (Source ID No. P006). The flakes are then aligned and formed into a continuous mat (Source ID No. P007). The mat is cut into sections which are then pressed at high temperature and pressure in a board press (Source ID No. P008), at a rate of up to 150,000 lb/hr and heated by thermal oil. Finally, the boards are trimmed (Source ID No. P010), sanded (Source ID No. P009), graded, edge coated and packaged for shipment. Multiple baghouses control PM emissions from these operations. The maximum production rate is 500 million square feet per year (MMscf/yr) of OSB.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Langboard's potential to emit (with permit limits) each PSD regulated pollutant does not exceed the 250-ton per year PSD major source threshold for any pollutant. The facility is, therefore, not a major source for PSD/NSR regulations. This facility is not one of the 28 named source categories under PSD for which the PTE threshold is 100 tons per year. Also, the facility is not located in a non-attainment area. Note that the facility is presently a synthetic minor source for the purposes of PSD permitting requirements as emissions of CO and NOx are limited below the major source threshold of 250 tpy.

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_2S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

Langboard OSB is an area source and not a major source of HAPs. Therefore, the following two MACT Standards apply to the facility:

40 CFR 63, Subpart CCCCCC, NESHAP for Gasoline Dispensing Facilities applies to the gas dispensing facility operated on-site by Langboard OSB.

40 CFR 63, Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines applies to the facility's two emergency generators and two emergency fire pump engines. Both are considered to be existing emergency engines.

The following MACT Standards do not apply to Langboard OSB:

40 CFR 63, Subpart DDDDD, NESHAP for Industrial/Commercial/Institutional Boilers and Process Heaters (The Boiler MACT) is not applicable to the facility because potential HAP emissions are estimated to be less than 10/25 tpy, and this is only applicable to the major sources of HAPs emissions.

40 CFR 63, Subpart DDDD, NESHAP for Plywood and Composite Wood Products (PCWP) is not applicable to the facility because it is not a major source of HAPs.

40 CFR 63 JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Industrial Boilers is not applicable to the facility because the Energy Systems (Source ID No. P001 and P002) are fuel burning equipment and not defined as boilers per this NESHAP.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

VOC emissions from the Langboard's existing OSB plant are controlled by incineration in the Energy System, and emissions are estimated to be less than 250 tpy. Therefore, no condition limiting the pine usage was included in the existing permit (No. 2493-027-0013-V-04-0).

Condition 2.1.1 in the current Title V operating permit No. 2493-027-0013-V-04-0 limits the facility's emissions of individual hazardous air pollutants (HAP) and the cumulative emissions of all hazardous air pollutants (HAPs) to remain below 10 and 25 tons per year, respectively. These limitations categorize the facility as an "area/synthetic minor" source for HAP emissions. Consequently, the facility is exempt from complying with the regulations pertaining to major sources of hazardous air pollutants as outlined in 40 CFR 63, National Emission Standards for Hazardous Air Pollutants

B. Applicable Rules and Regulations

NESHAP Subpart A – General Provisions applies to the facility because their emergency engines are subject to NESHAP ZZZZ.

NESHAP Subpart CCCCCC – Gasoline Dispensing Facilities applies to the facility because Langboard operates a gasoline dispensing facility on-site for several small vehicle and lawn maintenance engines (e.g., lawn mowers).

NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines applies to the facility since all emergency engines operated at the facility are considered to be existing stationary engines according to Subpart ZZZZ.

C. Compliance Status

The plant is currently operating in compliance per record.

D. Permit Conditions

Condition No. 2.1.1 is carried over from the existing permit No. 2493-027-0013-V-04-0. it requires the Permittee to limit individual and total HAP emissions to less than 10/25 tons per year to avoid being a major source of HAPs. The emissions of hazardous air pollutants (HAPs) enable the facility to retain its classification as an "area source" for HAP emissions under 40 CFR Part 63.

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
P001	Energy System A (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System
P002	Energy System B (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(g)	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System
P003	Dryer System A (Single pass rotary flake dryer)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B
P004	Dryer System B (Single pass rotary flake dryer)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B
P005	Fines/Flake Screening	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	N/A	N/A
P006	Flake Handling/Blending	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C001 C004 P001 P002	Electrostatic Precipitator Flake Handling Baghouse Energy System A Energy System B
P007	Forming Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C008	Forming Line Baghouse
P008	Board Press	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	P001 P002	Energy System A Energy System B
P009	Sander Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C006	Sander Line Baghouse
P010	Saw & Trim Line	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	C003	Saw & Trim Baghouse
P011	Fuel Relay & Storage Silo	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	N/A	N/A

B. Equipment & Rule Applicability

The PTE emissions calculations of NOx and CO were 242 and 248 tons per year respectively. To ensure that the facility stays as minor source for PSD, condition 3.2.1 limits NOx and CO emissions to be 55 lb/hr from both Energy Systems A and B. in Permit 2493-027-0013-V-03-0. The facility requested to lower the limits from 57.05 lb/hr to 55 lb/hr to ensure that the facility does not exceed 250 tpy in the event that the emergency engines have to be run.

The Energy Systems are subject to the NSPS Subpart Db PM limit of 0.10 lb/MMBtu for filterable PM. Each of the two combustion units of the Energy Systems has a heat input capacity of 160 MMBtu/hr and was constructed after the applicability date of June 19, 1984. The NSPS Subpart Db limit was previously subsumed by a PM PSD avoidance limit of 0.060 lb/MMBtu. NSPS Subpart Db limits PM emissions to 0.10 lb/MMBtu and exhaust gas opacities to not more than 20%.

Based on the procedures specified in 40 CFR 60.46b(d) for test methods, compliance with NSPS Subpart Db only measures filterable PM emissions as the condensable portion of PM will not be "captured" by the applicable test methods. Therefore, the applicable NSPS Subpart Db limit on the Energy Systems is 0.10 lb/MMBtu of filterable PM.

Langboard used data from the May 2015 testing to develop a ratio of the condensable-to filterable portion (0.027/0.076) of PM in the ESP exhaust gas. This ratio was multiplied by 0.10 lb/MMBtu to estimate the maximum level of condensable PM in the exhaust gas based on the NSPS subpart Db limit. This information was used to request an updated PSD avoidance limit, which is the sum of the NSPS Subpart Db limit (0.10 lb/MMBtu filterable PM) and the estimated maximum condensable PM limit (0.04 lb/MMBtu), which is 0.14 lb/MMBtu total PM. The Permittee accepted a PM emissions limit increase from 0.060 lb/MMBtu to 0.10 lb/MMBtu for filterable PM and 0.14 lb/MMBtu for Total PM emissions (filterable and condensable), from Energy System Units A and B (Emission Unit ID Nos. P001 and P002).

The PM emission limits for filterable and total PM was modified per Title V Permit Amendment 2493-027-0013-V-03-2 in condition 3.2.3 of permit.

Title V Permit Amendment 2493-027-0013-V-03-2 also reduced the PM emission limit for the Forming Line (Source ID No. P007), Saw & Trim Line (Source ID No. P010) and the Sander Line (Source ID No. P009) to 4.0 lbs/hr.

<u>Rules and Regulations Assessment:</u>

NSPS Subpart IIII is applicable to stationary compression ignition (CI) internal combustion engines that commenced construction after July 11, 2005, and were manufactured after April 1, 2006.

The facility includes two (2) diesel fired emergency generators and two (2) emergency fire pump engines. One generator is a Cummins DGFA, Model 6CTA8.3-G2 with a maximum engine rating of 201 hp (150 kW), and the other unit is an Onan DFM Genset, Model 275 with maximum engine rating of 369 hp (275 kW). One fire pump engine is a John Deere model with a maximum engine rating of 340 hp (254 kW), and the other unit is a Caterpillar model with a maximum engine rating of 160 hp

(119 kW). All of the engines were installed prior to the July 11, 2005, applicability date and are therefore not subject to NSPS Subpart IIII

Part 63 NESHAP Subpart A – General Provisions Every source subject to a NESHAP is also subject to the general provisions of NESHAP Subpart A, unless specifically exempted. Because the Quitman facility emergency engines are subject to NESHAP Subparts ZZZZ, as described below, the facility is also subject to requirements under Subpart A.

Part 63 NESHAP Subpart DDDD is applicable to major HAP facilities that manufacture plywood and/or composite wood products by bonding wood material or agricultural fiber, generally with resin, under heat and pressure to form a structural panel or engineered wood product. Since the Quitman facility is a synthetic minor source of HAP, or area source, the facility is not subject to NESHAP Subpart DDDD.

Part 63 NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines

All emergency engines operated at the Quitman facility are considered existing stationary engines under Subpart ZZZZ and are subject to rule requirements. Since each engine has a site rating less than 500 HP and each engine was installed at a synthetic minor HAP source prior to June 12, 2006, they are considered existing emergency engines under the Rule. There are no emission limits or performance test requirements for the engines, but several work practice standards do apply as stated in permit condition 8.27.3.

Part 63 NESHAP Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters

The revised Industrial-Commercial-Institutional Boilers and Process Heaters NESHAP (Boiler MACT), Subpart DDDDD, regulates HAP emissions from solid, liquid, biomass, and gaseous-fired steam generating units. The revised rule regulates boilers and process heaters located at major sources of HAP. Since the Quitman facility is a synthetic minor source of HAP the facility is not subject to NESHAP DDDDD.

Part 63 NESHAP Subpart CCCCCC – Gasoline Dispensing Facilities

NESHAP Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, applies to gasoline dispensing facilities located at an area source of HAP. NESHAP Subpart CCCCCC contains several operational and maintenance requirements for GDF.

Langboard operates a gasoline dispensing facility on-site for several small vehicles and lawn maintenance engines (e.g., lawn mowers) and is subject to NESHAP Subpart CCCCCC

Energy System A & Energy System B (Source ID Nos. P001 and P002)

The energy systems contain two 160 MMBtu/hr heat input capacity units. The combustion gases supply hot process air to the dryers for flake drying, the thermal oil heater for the board press and a steam turbine to produce steam for electrical power generation. Energy system flue gases are

discharged from a single stack after passing through an ESP (Source ID No. C001) for particulate matter removal. Both energy systems are subject to the following rules and regulations:

The energy systems are considered as "fuel burning equipment" which requires them to be subject to The Georgia Rules for Air Quality Control (GRAQC) 391-3-1-.02(2)(d) – Fuel Burning Equipment which provide the equation to calculate the allowable PM emissions and the opacity limit.

GRAQC 391-3-1-.02(2)(g) – Sulfur Dioxide requires that all fuel burning sources having heat input of 100 million BTU's per hour or greater shall not burn a fuel containing more than 3 percent sulfur, by weight. The energy systems are subject to Rule (g) for sulfur dioxide. It burns only wood waste, so the sulfur content will always be much less than 3 percent; hence no monitoring is needed for sulfur dioxide.

NSPS Subpart A – General Provisions requires initial notification and performance testing, recordkeeping, monitoring, provides reference methods and mandates general control device requirements.

These fuel-burning units are defined as steam generating units. Each being above 100 MMBtu/hr heat input capacity and constructed after June 19, 1984, they are subject to NSPS Subpart Db- "Standards of Performance for Industrial-Commercial Institutional Steam Generating Units.

The NSPS requires start-up notification, an initial performance test for PM, fuel-usage record keeping, and calculation of the annual capacity factor for wood. Because neither Energy System Unit A nor B use any fossil fuel, they are not subject to any Subpart Db sulfur dioxide or nitrogen oxides limits but are required to calculate capacity factors to prove this status.

Dryer System A & B (Source ID Nos. P003 and P004)

These are two single pass rotary dryers with a maximum input rate of 75,000 pounds per hour. The heat used to operate the dryers is provided from Energy Systems A & B (Source ID Nos. P001 & P002). The dryers are subject to emission limits for VOCs and HAPS to avoid being subject to PSD.

The dryer systems are subject to GRAQC 391-3-1-.02(2)(e) – PM Emission from Manufacturing Processes, which contains an equation for the emission limit of PM. Since their exhaust emission is uncontrolled, CAM is not applicable.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%

(Sources ID No. P005, P006, P007, P008, P009, P0010, P0011

GRAQC 391-3-1-.02(2)(e) contains the emission limit equation for PM.

GRAQC 391-3-1-.02(2)(b) – Visible Emissions limits the dryers to an emission opacity of 40%.

C. Permit Conditions

Condition 3.2.1 limits emissions of NOX and CO to 55 Ib/hr for both Energy Systems combined to allow the facility to run emergency engines if necessary and remain below the 250 tpy threshold.

Condition 3.2.2 limits the PM emissions to 4.0 lb/hr for Forming Line (Source ID No. P007), Saw & Trim Line (Source ID No. P010) and the Sander Line (Source ID No. P009). PM emissions should not exceed 4.29 lb/hr for the Flake Handling/Blending (Source ID No. P006) and 1.00 lb/hr for the Fines/Flake Screening (Source ID No. P005) and Fuel Relay and Storage Silo (Source ID No. P011) to ensure that the facility stays as minor source for PSD.

Condition 3.2.3 limits the filterable PM emissions to 0.10 lb/MMBtu which is subject to NSPS Subpart Db- "Standards of Performance for Industrial-Commercial Institutional Steam Generating Units and 0.14 lb/MMBtu for total PM to comply with PSD avoidance.

Condition 3.3.1 limits the opacity of Energy System A or Energy System B to 20% (6-minute average) to comply with Subpart Db "Standards of Performance for Industrial Commercial-Institutional Steam Generating Units."

Condition 3.3.2 was carried over from the current permit. This condition allows the facility to burn plant and office waste up to 2 percent of total fuel heat input in Energy System A and Energy System B.

Condition 3.3.3 states the allowable levels of the constituents that are produced from used oil within the facility's process in accordance with the provisions of 40 CFR Part 279 – Standards for the Management of Used Oil, Subpart B – Applicability, Section 279.11 – Used oil specifications.

Condition 3.3.4 allows the facility to dispense gasoline on-site for small vehicles and lawn maintenance engines under 40 CFR 63, Subpart CCCCCC.

Condition 3.3.5 was added to this permit. It establishes applicable operation and equipment requirements for all the subject gasoline dispensing equipment under 40 CFR 63 Subpart CCCCCC.

Condition 3.4.1 carried over from the current permit without any change. it states the PM and opacity limits for Energy System A & Energy System B (Source ID Nos. P001 and P002).

Condition 3.4.2 limits the amount of sulfur that can be emitted from the Energy Systems (Source ID Nos. P001 and P002) under SIP Rule (g).

Conditions 3.4.3 and 3.4.4 were carried over from the current permit without any change. These conditions incorporate the applicable visible and PM emission limits under SIP Rules (b) and (e).

Conditions 3.4.5 and 3.4.6 were carried over from the current permit. It includes the fugitive emission requirements under Rule (n).

Conditions 3.5.1 through 3.5.3 contain operating requirements for air pollution control devices to ensure proper function of the control devices.

The facility requested to remove NOx abatement system (APCD ID No. C007) from condition 3.5.4. The Division has approved the request since Langboard operates (CEMS) to continuously monitor and record the CO and NOX emissions from the Energy Systems to comply with the NOX PSD Avoidance limit in Condition 3.2.1.

Condition 3.5.5 is updated to reflect more recent language. it contains operating requirements for the Board Press and Board Cooling area to ensure proper function of the control device.

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

Condition 4.2.1 requires the facility to perform a performance test for nitrogen oxide emissions.

Condition 4.2.2 requires the facility to conduct performance tests in 12-month intervals for PM.

Condition 4.2.3 states additional performance testing may be necessary for the change of fuel material.

Condition 4.2.4 requires the facility to determine compliance with the carbon monoxide emission limit upon request.

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Condition 4.2.5 requires the facility to conduct performance tests at the outlet of the Energy System (Source Code ID Nos. P001 and P002) to determine the total HAPs.

Condition 4.2.6 defines an operating day for the previous conditions.

Condition 4.2.7 requires the facility to record the combustion zone temperatures.

Condition 4.2.8 from current permit is removed. The Performance test for PM emissions was conducted in December 2014.

Condition 4.2.9 of current permit is changed to 4.2.8 which requires the facility to use pressure drop that acquired from condition 5.2.3 and the data from the performance test to determine the arithmetic average of the pressure drop for each baghouse.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to continuously monitor and record the nitrogen oxides (NOx) concentration and carbon monoxide (CO) concentration, gas flow rate) and the opacity of the visible emissions from the Energy System (Source ID Nos. P001 and P002)

Conditions 5.2.2 requires facility to continuously monitor and record necessary parameters, temperatures of energy Systems A and B, Secondary amperage (in milliamps) and voltage (in kilovolts) of the electrostatic precipitator (Source I.D. No. C001)

Condition 5.2.3 requires from the Permittee to monitor the pressure drop across the baghouses (Source ID Nos, C003, C004, C006 and C008).

Condition 5.2.4 of current permit has been removed. This condition language is more appropriate for cyclone than baghouse. Conditions 5.2.3 to 5.2.6 of the current permit covers all monitoring requirements of the baghouses.

Conditions 5.2.4 requires the facility to check the exterior of units for holes or any sign of malfunction and check of the baghouses periodically for visible emissions.

Conditions 5.2.5 and 5.2.6 ensure proper function of the baghouses.

Conditions 5.2.7 and 5.2.8 require the facility to determine 12-hour block averages of combustion zone temperatures and 1-hour hour averages for secondary volts and secondary currents.

Condition 5.2.9 requires the facility to analyze on-site generated used oil burned at the facility once per year.

Condition 5.2.10 includes the CAM requirements for the emissions units listed in table.

Condition 5.2.11, 5.2.12, 5.2.13 require the facility to comply with the performance criteria for PM emissions from the Energy Systems (Source ID Nos. P001 and P002) and the Dryer Systems (Source ID Nos. P003 and P004), volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and PM emissions from Flake Handling (Source ID No. P006).

Condition 5.2.14 requires the facility to maintain the natural draft openings as specified in initial testing of capture efficiency.

Condition 5.2.15 was added to this permit. The condition incorporates applicable monitoring/record keeping and reporting requirements for the gasoline dispensing equipment subject to 40 CFR 63 Subpart CCCCCC at this facility.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, known as the Compliance Assurance Monitoring Regulations (CAM), facilities must create and submit monitoring plans for specific emission units as part of their Title V application. Any emission unit controlled by a control device that has potential pre-control device emissions equal to or greater than 100 percent of the threshold for classification as a major source, as defined by 40 CFR §64.2(a)(3), falls under CAM requirements. Both Energy Systems (Source ID Nos. P001 and P002) are subject to CAM for PM emissions. Both Dryer Systems (Source ID Nos. P003 and P004) and Flake Handling/Blending (Source ID No. P006) are subject to CAM for PM, VOC and HAP emissions. The Board Press (Source ID No. P008) is subject to CAM for VOC and HAP emissions.

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 quarterly basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.1 requires the facility to keep their records in a format suitable for inspection.

Condition 6.1.2 requires the facility to report any malfunctions or breakdown of process, fuel burning, or emissions control equipment to the Division.

Condition 6.1.3 requires the facility to submit any failure to meet an emissions limitation.

Condition 6.1.4 requires the facility to report any excess emissions, exceedances and excursions.

Condition 6.1.5 provides which records should be kept by the facility where applicable.

Condition 6.1.6 requires the facility to maintain files of required measurements.

Condition 6.1.7 provides which excess emissions, exceedances and excursions should be reported

Condition 6.2.1 requires the facility to maintain records for each unit-operating day for the Energy System (Source ID Nos. P001 and P002).

Condition 6.2.2 requires the facility to record the production of board from the Board Press (Source ID No. P008).

Condition 6.2.3 requires the facility to maintain records of maintenance performed on their air pollution control devices (APCDs).

Condition 6.2.4 requires the facility to maintain record of when emissions from the Dryer System (Source ID Nos. P003 and P004), Blending (Source ID No. P006) or the Board Press (Source ID No. P08) aren’t being controlled.

Condition 6.2.5 requires the facility to use HAP emissions factors determined during the initial performance test and the monthly board press production records required in Condition No. 6.2.2, to calculate the total monthly emissions of each HAP. It also requires the facility to notify the Division if emissions of any individual HAP exceed 0.83 tons (10 tons/year divided by 12 months = 0.83 tons)

or if emissions of all listed HAPs combined exceed 2.08 tons, during any calendar month (25 tons/year divided by 12 months = 2.08 tons). This condition is essential to maintain the facility as an area source regarding HAP emissions under 40 CFR Part 63, as required by Condition 2.1.1.

Condition 6.2.6 requires calculating the twelve-month rolling total emissions of each listed hazardous air pollutant to maintain the facility as an area source regarding HAP emissions under 40 CFR Part 63, as required by Condition 2.1.1.

Condition No. 6.2.7, requires the Permittee to maintain records of the fuel combusted in the Energy System and to calculate the percentage of waste fuel Btu input to the Energy System,

Condition No. 6.2.8, requires the Permittee to calculate the annual capacity factors from the records of the fuel combusted in the Energy System maintained per Condition 6.2.7

Condition 6.2.9 requires the facility to maintain a record of actions taken to reduce fugitive dust.

Condition 6.2.10 is added to this Permit. It includes record-keeping, reporting, and notification obligations as per 40 CFR 63 Parts CCCCCC.

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.1 allows the facility to make any 502(b)(10) changes without Permit revision.

B. Alternative Requirements

Not applicable

C. Insignificant Activities

Refer to http://gatv.georgiaair.org/GATV/default.asp for the Online Title V Application.

Refer to the following forms in the Title V permit application:
- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Nota applicable

E. Short-Term Activities

Not applicable

F. Compliance Schedule/Progress Reports

Not applicable

G. Emissions Trading

Not applicable

H. Acid Rain Requirements

Not applicable

I. Stratospheric Ozone Protection Requirements

Condition 7.11.1 states under what conditions will require the facility to be subject to 40 CFR Part 82 Subpart F.

Condition 7.11.2 states under what conditions will require the facility to be subject to 40 CFR Part 82 Subpart B.

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 October 30, 2024 and ended on December 2, 2024. Comment were not received by Division.