

Facility Name: **Langboard MDF Value Added Products Plant**  
City: Willacoochee  
County: Atkinson  
AIRS Number: 04-13-003-00015  
Application #: TV-13399  
Date SIP Application Received: 11/9/01  
Date Title V Application Received: 11/9/01  
Date of Permit: 5/10/01  
Permit No: 2431-003-0015-V-01-1

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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<b>ISMP</b>	Bob Scott	Richard Taylor
<b>Toxics</b>	NA	NA

## **Introduction**

This narrative is being provided to assist the reader in understanding the content of the attached administrative Title V Permit amendment. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit amendment is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit amendment is to make administrative changes to the permit. Such administrative changes may include a facility name and/or ownership change and fixing typographical errors. The following narrative is designed to accompany the draft permit amendment and is presented in the same general order as the permit amendment. It describes the facility receiving the permit amendment, existing permits and the changes being made to the permit. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing.

## Regulatory Analysis

### II. Proposed Amendment

#### A. Description of Amendment

Application No. 13399 dated 11/6/01 is an administrative amendment request to correct the baghouse cross-references in Table 3.1 and Condition 3.2.1. Currently, Table 3.1 shows that both Baghouses C001 and C002 control emissions from the Molding Lines (G001). In reality, Baghouse C001 controls emissions from the Molding lines and Baghouse C002 controls emissions from the Primer Lines. In the initial Title V permit review, it was incorrectly assumed that only the Molding Lines emitted particulate matter and the Primer Lines only emitted VOC (from surface coating), so we assumed that both baghouses controlled the Molding Lines. However, it is now clear that there is some wood-working that emits PM associated with the Primer Lines, and that these emissions are controlled by Baghouse C002. Table 3.1 is updated to show the correct baghouse designation.

Condition 3.2.1 is modified to correct the baghouse and emission unit cross-references also. Condition 3.2.1 was established to ensure that total PM emissions from Langboard's MDF VAP plant and the neighboring MDF mill do not exceed the PSD major source threshold of 250 tons per year. In its existing state, the condition limited PM from the baghouses to 17.65 tpy (4 lb/hr), but it only referred to the Molding Lines. As discussed above, the Primer Lines also emit PM and are controlled by Baghouse C002. Because this limit was supposed to cover all PM-emission sources at the facility, it has been updated to correctly include the Primer Lines as well. This limit, in conjunction with the PM limits on Langboard's MDF mill, prevent these two facilities from being considered a Major Site under PSD regulations.

Conditions 3.4.1 and 3.4.2 (which establish Rule (b) and Rule (e) as applicable) are modified to include the Primer Lines.

The facility address has been updated. When the initial Title V permit was issued, no street address had been assigned to the location of the plant. Since that time, the authorities have designated the street address to be 1500 Springhead Road (the address of the adjacent MDF plant is 1000 Springhead Road).