

Facility Name: **TLC Mouldings, Inc. (formerly Langboard MDF V.A.P.)**

City: Willacoochee

County: Atkinson

AIRS #: 04-13-003-00015

Application #: 15318

Date SIP Application Received: n/a

Date Title V Application Received: May 4, 2004

Permit No: 2431-003-0015-V-01-2

Program	Review Engineers	Review Managers
SSPP	Eric Cornwell	John Yntema
SSCP		Douglas Waldron
ISMP	Bob Scott	Richard Taylor
TOXICS	John Caudle	Karen Hays

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2431-003-0015-V-01-0	May 10, 2001	x	
2431-003-0015-V-01-1	March 24, 2003	x	

Table 2: Comments on Specific Permits

Permit Number	Comments
2431-003-0015-V-01-0	Initial Title V permit
2431-003-0015-V-01-1	Administrative Amendment to correct baghouse cross-referencing

B. Regulatory Status

1. PSD/NSR/RACT

TLC Mouldings, Inc. (new name of Langboard MDF Value Added Products) is collocated with Langboard MDF. Since these plants are considered one site for PSD applicability, the two plants “share” limits on VOC and PM to avoid PSD.

This facility is a minor source under PSD (40 CFR 52.21). Emissions of all PSD-regulated pollutants are either limited by existing permit conditions to less than 250 tons per year (the case for PM, CO, NOx, and VOC), or have true potential emissions of less than 250 tons per year (the case for SO2). This facility is not considered one of the “list of 28” categories defined by 40 CFR 52.21.

Nonattainment NSR does not apply to this facility because Atkinson County is in attainment with all national ambient air quality standards.

2. Title V Major Source Status by Pollutant

The Table below summarizes the Title V Major Source status of the Title V site, including both TLC Mouldings and Langboard MDF because these two plants are considered one site for the purposes of Title V and PSD.

Table 3: 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	x	x		
PM ₁₀	x	x		
SO ₂	x			x
VOC	x	x		
NO _x	x	x		
CO	x	x		
TRS				
H ₂ S				
Individual HAP	x	x		
Total HAPs	x	x		

II. Proposed Modification

A. Description of Modification

Application No. 15318 received May 4, 2004 covers a variety of issues at Langboard's MDF Value Added Products Plant, including a name change to TLC Mouldings, changing PSD avoidance limits for PM emissions on the two baghouses, changing baghouse monitoring techniques, and addressing off-permit changes proposed in past letters. Detailed descriptions of the proposed changes covered in this application and in outstanding permit applications are provided below.

- Name change from Langboard MDF Value Added Products Plant to TLC Mouldings, Inc. The parent company will remain Langdale Industries.
- Revision of the PSD Avoidance limits for PM on the two baghouses (C001 and C002) as follows: Revise Condition 3.2.1 to increase the PM limit on baghouses C001 and C002 from a combined total of 4 lb/hr (17.65 tpy) to individual limits of 31.9 tpy from C001 and 8.0 tpy from C002. TLC Mouldings proposes to test these units, and use the test results to determine an emission factor. With that, and the monthly operating hours, they will calculate PM emissions on a 12-month rolling total basis. This limit revision is being proposed because recent tests have shown compliance problems with the existing limit. To provide for an increase in PM emissions from TLC, Langboard has proposed reductions of PM allowables at the adjacent MDF mill such that the total allowable PM emissions from the site will remain below 250 tpy.
- Revision of the periodic monitoring approach for Baghouses C001 and C002 to switch from pressure drop monitoring as the main indicator to daily visible emissions checks. Langboard MDF's permit already uses daily visible emissions checks for baghouse monitoring. The Division agrees that visible emissions checks are a suitable replacement for pressure drop monitoring.
- Revision of the emission unit nomenclature to more accurately reflect actual operations at the TLC Mouldings plant. The Pellet Mill, which was installed as an Off-permit change and listed as Insignificant, will be added to Table 3.1.
- Incorporate two Off-permit changes: 1) Off-permit change proposed in a letter dated June 24, 2002 for the addition of a five-head moulder to Sawing and Moulding Lines Equipment Group (T001); and 2) Off-permit change proposed in a letter dated November 8, 2002 for changes to the sawing equipment.

B. Emissions Change

The proposed changes will not affect the actual emissions from the TLC Moulding plant, because no new emissions units are being added. Potential emissions of PM from TLC Moulding will increase due to the revision of the PM limits on the baghouses, though the total for the Title V site will be relatively unchanged.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	x	0	22.3
PM ₁₀	x	0	22.3
SO ₂	x	0	0
VOC	x	0	0
NO _x	x	0	0
CO	x	0	0
TRS			
H ₂ S			
Individual HAP	x	0	0
Total HAPs	x	0	0

C. PSD/NSR Applicability

This modification will not be considered a major modification under PSD. This source is a minor source under PSD (52.21) and will remain such.

III. Facility Wide Requirements

A. Emission and Operating Caps:

No Changes

B. Applicable Rules and Regulations

No Changes

C. Compliance Status

In recent tests, Langboard Value Added Products (now TLC) exceeded the existing lb/hr PM limit for Baghouse C001. The company contended that, because the existing permit provided both a lb/hr limit as well as a ton/year limit, as long as the tpy limit was complied with, there was no violation. While EPD does not agree with Langboard, the limits are being revised to reflect the actual current emission rates and to allow some compliance buffer, while still ensuring that site-wide PM emissions will remain below 250 tons per year (that being the only purpose for the limits).

D. Operational Flexibility

Not Applicable

E. Permit Conditions

No Changes

IV. Regulated Equipment Requirements**A. Brief Process Description**

The TLC Mouldings facility receives MDF from Langboard's MDF mill, which is adjacent. The MDF is sawed, routed, and sanded to make mouldings such as window frame moulding, chair rail, and floor moulding. The mouldings are then painted. Baghouses C001 and C002 control PM emissions from the processes. The pellet mill mixes sawdust and water to form wood pellets for use as a fuel product for outside sale.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
T001	Sawing and Moulding Lines	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.2.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.1 through 6.2.4	C001	Baghouse
T002	Painting and Finishing Operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.1, 3.2.2, 3.4.1, 3.4.2, 4.2.1, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.1 through 6.2.4	C002	Baghouse
T003	Pellet Mill Operations	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.1, 3.4.2	N/A	N/A

C. Equipment & Rule Applicability**Emission and Operating Caps –**

A PSD avoidance limit is being modified. The combined PM limit on Baghouses C001 and C002 will be changed from 4 lb/hr (17.65 tpy) to 31.9 tpy from C001 and 8.0 tpy from C002. To account for this increase in allowable PM emissions at the TLC plant, the adjacent Langboard MDF plant will accept reductions of its PM limits. These revisions are addressed in Application No. 16173 from Langboard MDF.

Applicable Rules and Regulations -

The proposed changes will not trigger any new state or federal regulations.

D. Compliance Status

In recent tests, Langboard Value Added Products (now TLC) exceeded the existing lb/hr PM limit for Baghouse C001. These limits are being revised to allow some compliance buffer, while still ensuring that site-wide PM emissions will remain below 250 tons per year.

E. Operational Flexibility

No Changes

F. Permit Conditions

Condition 3.2.1 is modified to revise the PM limits of baghouses C001 and C002 from 4 lb/hr (17.65 tpy) to 31.9 tpy from C001 and 8.0 tpy from C002.

Condition 3.2.2 is modified to clarify that the existing VOC limit applies to the entire TLC Mouldings facility.

Condition 3.4.1 is modified to account for the nomenclature changes to the emissions units.

Condition 3.4.2 is modified to account for the nomenclature changes to the emissions units.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Condition 4.2.1 is revised to remove the requirement to establish pressure drop operating ranges during the scheduled PM testing on Baghouses C001 and C002. With baghouse monitoring switching from pressure drop-based to visible emissions-based, an established pressure drop range is no longer needed. The results of the scheduled emissions testing will be used to establish a short-term emission factor (in lb/hr) to be used to track monthly PM emissions.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Condition 5.2.2 is added to require a baghouse preventative maintenance plan on Baghouses C001 and C002. This Condition mirrors the requirements for baghouses at the Langboard MDF plant.

Conditions 5.2.3 and 5.2.4 are added to require daily visible emissions checks on Baghouses C001 and C002. These Conditions mirror the requirements for baghouses at the Langboard MDF plant.

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7c.i. is modified to replace the baghouse pressure drop excursion with an excursion level based on two consecutive readings of visible emissions from either baghouse (C001 or C002).

Condition 6.2.2 is added to require records be kept of the hours of operation of the equipment controlled by Baghouses C001 and C002. These recorded hours will be used, along with the short-term emissions rates established during the performance tests, to calculate monthly PM emissions.

Condition 6.2.3 is added to require monthly calculations of PM emissions from each Baghouse C001 and C002. A safety factor of 1.15 is added to account for variances in baghouse performance.

Condition 6.2.4 is added to require PM calculations for 12-month rolling totals.

VIII. Specific Requirements

- A. Operational Flexibility
No Changes
- B. Alternative Requirements
No Changes
- C. Insignificant Activities
The insignificant activities table in Attachment B has been updated.
- D. Temporary Sources
No Changes
- E. Short-Term Activities
No Changes
- F. Compliance Schedule/Progress Reports
No Changes
- G. Emissions Trading
Not Applicable
- H. Acid Rain Requirements
Not Applicable
- I. Prevention of Accidental Releases
No Changes
- J. Stratospheric Ozone Protection Requirements
No Changes
- K. Pollution Prevention
No Changes
- L. Specific Conditions
No Changes

Addendum to Narrative

The 30-day public review started on June 23, 2005 and ended on July 23, 2005. Comments were not received by the Division.

The draft permit has been modified to include a condition (Condition 3.3.1) establishing the general applicability of 40 CFR 63 Subpart QQQQ (Surface Coating of Wood Building Products MACT). The existing source compliance date for this NESHAP is May 28, 2006.