

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **International Paper-Folkston Lumber**

City: Folkston

County: Charlton

AIRS #: 04-13-049-00004

Application #: 12785

Date SIP Application Received: Jan 18, 2001

Date Title V Application Received: Oct 17, 2001

Permit No: 2421-049-0004-V-01-2

Program	Review Engineers	Review Managers
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TOXICS	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed 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 proposed 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 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 and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2421-049-0004-V-01-0	September 30, 1999		✓
2421-049-0004-V-01-1	August 14, 2000	✓	

Table 2: Comments on Specific Permits

Permit Number	Comments
2421-049-0004-V-01-1	To authorize a kiln extension, a boiler modification, a debarker replacement, and the installation of a short log in-feed deck.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is a non-major source under PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

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	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual	✓			✓

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
Total HAPs	✓			✓

II. Proposed Modification

A. Description of Modification

Tree length pine logs are processed into dimensional lumber. Timbers that are stacked, kiln dried, planed, sorted by length & grade and packed for shipment. The facility has two wood waste fired boilers (Source Codes FB01 and FB02), which provide steam to the dry kilns. The facility is required to monitor the pressure drop across two multiclones B1CY and B2CY which control particulate matter emissions from the boilers. The range of pressure drop measurement across multiclones, which is required to be reported as an excursion, is changed based on the statistical analysis of the pressure drop data from January 2000 particulate matter tests. No process modification is to be made. The range of pressure drop to be reported as excursion in Condition 5.2.8 is revised.

C. PSD/NSR Applicability

A facility is a major source if it has the potential to emit (PTE) at least one pollutant that exceeds 250 tons per year (TPY), the PSD major source threshold. [Sawmills are not in the 28 named source categories whose PSD major source threshold is 100 tons per year.] A change is a major modification if: (a) it is already a major source and the increase of at least one pollutant exceeds the significance level or (b) if a minor source, the increase exceeds the major source threshold.

The facility is a non-major source under PSD/NSR regulations. This permit amendment will not result in any change in emissions of air pollutants. Therefore, the modification is not subject to PSD review and the source will not become major for PSD.

III. Facility Wide Requirements

- A. Emission and Operating Caps:** None
- B. Applicable Rules and Regulations:** None
- C. Compliance Status:** No noncompliance issues exist.
- D. Operational Flexibility:** None requested by the facility.
- E. Permit Conditions:** None

IV. Regulated Equipment Requirements

This modification involves no physical changes and the permit amendment will not result in any change in emissions of air pollutants. Hence there are no regulated equipment requirements due to this modification.

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

- A. Individual Equipment:** None applicable.
- B. Equipment Groups (all subject to the same test requirements):** None applicable.

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

- A. Individual Equipment:** None applicable.
- B. Equipment Groups (all subject to the same monitoring requirements):** None applicable.

VII. Other Record Keeping and Reporting Requirements

The Permittee submitted a letter dated January 12, 2001 (received as Application No. 12785) requesting that EPD modify Condition No. 5.2.8c.i. This is in reference to the required reporting of pressure drop excursions for multiclones controlling Boilers B1CY and B2CY.

ISMP performed a statistical analysis of the pressure drop data from January 2000 particulate matter tests. An analysis of the data (3 sigma standard deviation) indicated an acceptable range of 3.0 to 10.5 inches of water column for the multiclone pressure drop. An excursion for the operation of boilers would then be any pressure drop outside of this range. EPD agreed to accept this range of pressure drop and stated so in its acknowledgement letters dated Sept 30, 1999 and November 21, 2000.

Condition No. 5.2.8c.i, which defines a reportable pressure drop excursions, is revised.
It had read:

- c. Excursions:
 - i. Any time the pressure drop of Multiclone B1CY or B2CY is greater than 120 percent or less than 80 percent of the values established during the most recent performance test required by Condition 4.2.1.

It now reads:

- c. Excursions:
 - i. Any measurement of the pressure drop across multiclone B1CY or B2CY that is outside the range of 3.0 to 10.5 inches of water.

The rest of Condition 5.2.8 is revised so that it includes language in current template Condition 6.1.7. The revised condition is as follows:

- 5.2.8 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b) 1 and 40 CFR 70.6(a)(3)(i)]
- a. Excess emissions: (means for the purpose of this Condition and Condition 5.3.1, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 5.3.1.
 - b. Exceedances: (means for the purpose of this Condition and Condition 5.3.1, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable

emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

None required to be reported in accordance with Condition 5.3.1.

c. Excursions: (means for the purpose of this Condition and Condition 5.3.1, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i Any measurement of the pressure drop across multiclone B1CY or B2CY that is outside the range of 3.0 to 10.5 inches of water.
- ii. Any time the pressure drop of baghouse PMBH is outside the range of 1 to 8 inches of water.
- iii. Any adverse condition revealed by the inspections required by Conditions 5.2.6 and 5.2.7.

d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 5.3.1:

None required to be reported in accordance with Condition 5.3.1.

VIII. Specific Requirements

A. Operational Flexibility: None applicable.

B. Alternative Requirements: None applicable.

C. Insignificant Activities

There are no changes in the insignificant activities list.

D. Temporary Sources: None applicable.

E. Short-Term Activities: None applicable.

F. Compliance Schedule/Progress Reports: None applicable.

G. Emissions Trading: None applicable.

H. Acid Rain Requirements: None applicable.

The facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Prevention of Accidental Releases: None applicable.

J. Stratospheric Ozone Protection Requirements: None applicable.

K. Pollution Prevention: None applicable.

L. Specific Conditions: None applicable.

IX. General provisions

As per requirements of U.S. EPA, Condition 8.23.1, which relates to credible evidence and information is added.

8.23 Use of Any Credible Evidence or Information

8.23.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[391-3-1-.02(3)(a)]

Addendum to Narrative

The draft permit amendment was issued on September 10, 2003. EPA was notified on September 16, 2003 regarding issue of draft /proposed Part 70 Permit Amendment. The 45-day EPA review period ends on November 1, 2003. No written comments were received from the facility or EPA. Hence, no change is made to the amendment