

Facility Name: **International Paper- Folkston Lumber**  
 City: Folkston  
 County: Charlton  
 AIRS #: 04-13-04900004

Application #: TV-15213  
 Date Application Received: April 1, 2004 & April 4, 2005  
 Permit No: 2421-049-0004-V-02-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **International Paper- Folkston Lumber** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This 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: International Paper-Folkston Lumber
2. Parent/Holding Company Name: International Paper Company
3. Previous and/or Other Name(s): Folkston Lumber Mill  
Previously known as a Union Camp Corporation-Folkston Lumber.
4. Facility Location  
103 Mays Blvd., Folkston, Georgia 31537, Charlton County.
5. Attainment, Non-attainment Area Location, or Contributing Area  
The facility is located in an attainment area.
6. Class I Area Impacts  
The facility is located within 200 km of the Wolf Island and Okefenokee Class I areas.

### B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

### 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
2421-049-0004-V-01-0	September 30, 1999	Initial Title V permit
2421-049-0004-V-01-1	August 14, 2000	502(b)(10) Change for kiln extension, boiler modification, debarker replacement, and short log infeed deck installation.
Off-Permit Change	June 4, 2001	For installation of prefabricated steel drive-through chip bin with conveyor

Off-Permit Change	October 2, 2002	For maintenance on Kiln No. 5.
Off-Permit Change	January 24, 2003	For the replacement of the fin tubes in the No. 5 and No. 6 kilns.
Off-Permit Change	July 7, 2003	For modification of CNS and chip head upgrade.
2421-049-0004-V-01-2	November 12, 2003	Amendment to change the range of pressure drop.
Off-Permit Change	January 23, 2004	For installation of automatic log rotation and scan conveyor
Off-Permit Change	Nov 12, 2004	For burning oil soaked chips, absorbent pigs and pads in boilers
2421-049-0004-V-01-3	May 13, 2005	502(b)(10) Change for installation of orifice traps, kiln vents and steam pipes

#### D. Process Description

##### 1. SIC Codes(s):

2421

The SIC Code(s) identified above were assigned for air quality regulatory and administrative purposes only. This SIC code assignment is not intended to be used for any other purpose. Different SIC codes may be used by the Facility or other agencies and/or utilized for other regulatory and non-regulatory purposes. The Division reserves the right to modify the above SIC Code assignment as necessary for air quality regulatory and administrative purposes.

##### 2. Description of Product(s)

The facility manufactures southern yellow pine dimensional lumber and timbers.

##### 3. Overall Facility Process Description

###### Log Preparation:

Southern yellow pine logs of tree length are received by trucks. The logs are stored under a circular log crane. The logs are sawn to desired length, debarked and scanned for metal.

Bark from the debarker is dropped into a vibrating conveyor and transferred to a holding area to be sold off-site as mulch.

Poor quality log parts are chipped and used as a paper mill fiber source.

Sawmill:

Sawmills cut the logs into dimensional lumber or timbers. The sawmill equipment includes a single set of twin bandsaws, a two-saw edger and an 11-saw trimmer. Lumber is trimmed, is sorted by length and dimension, and stacked on sticks. Trim blocks and edger strips are chipped and transferred to their paper mill off-site, to be used as a fiber source in the paper making process.

Lumber Drying Kilns:

The lumber and timbers are dried in one of two kilns to approximately 19 percent moisture content. Two wood fired boilers, with a design heat input capacity of 28.5 and 29.26 MMBtu/hr, provide the drying heat using sawdust as a fuel.

Planer Mill:

The dried lumber and timbers are planed in the planer mill, and then sorted by length, size, and grade, and transported by truck or rail for delivery to the customer.

General:

By-products produced by the facility are wood chips, bark, sawdust, bark and shavings. Wood chips are transported off-site. Sawdust and bark is used to fire the two boilers and also sold off site as fuel. Planer shavings from the planing process are sold off site for various purposes.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

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

The annual throughput capacity for kiln FOK5 and kiln FOK6 is 51,000 MBF/yr each, as per the information provided in the renewal application. The emission factor used for calculating VOC emission was 3.68 lbs VOC per MBF. The Division, at the time of review of initial Title V permit, accepted this emission factor. Using that, the facility's total PTE VOC emission is 187.5 tons per year (51,000 MBF/yr \* 2 kilns \* 3.68 lbs VOC/MBF \* 1 t / 2000 lb), which is less than the 250 tpy threshold for PSD. Therefore, this plant is not a VOC major source for PSD. Note that PTE of all other criteria air pollutants (PM/PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>) are much below 250 tpy. In the Title V application, the Permittee has estimated VOC emissions to be 163.2 tpy, using an emission factor of 3.2 lbs of VOC per MBF. While it is possible that the emission rate may be that low, EPD

believes that emissions from kilns in Georgia could be as high as 4 lb/ MBF. If so, the VOC PTE would be 204 tons/yr, which is still less than 250 tons per year.

AP-42 has not published a final emission factor for this process. However it is not anticipated that the final factor could cause PTE to exceed 250 tpy of VOCs at the facility.

The potential to emit (PTE) each PSD regulated pollutant does not exceed the 250 ton per year PSD major source threshold. The facility is, therefore, an existing minor source with regard to PSD/NSR regulations. Note that sawmills are not one of the 28-named source categories whose PSD major source threshold is 100 tons per year.

## 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 <sub>10</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓	✓	No	
NO <sub>x</sub>	✓			✓
CO	✓	✓	No	
TRS	✓			✓
H <sub>2</sub> S	✓			✓
Individual HAP	✓	✓	No	
Total HAPs	✓			✓

## 3. MACT Standards

This facility is subject to a current MACT standard.

The Plywood and Composite Wood Products (PCWP) NESHAP, 40 CFR Part 63 Subpart DDDD, published in the Federal Register (Vol. 69, No. 146/Friday, July 30, 2004), indicates that the MACT is applicable to sawmills with lumber kilns (SIC # 2421) which are major for HAPs. The renewal application indicates that the potential to emit methanol is around 12.3 tons per year, which is more than the threshold limit of 10 tpy for any single HAP. The facility has not requested SM status. Therefore, this facility is assumed to be major for HAPs and the MACT is applicable.

The provisions of 40 CFR 63, Subpart DDDD include no control requirements for lumber kilns. However, the rule indicates that facilities with non-located lumber kilns (i.e., lumber kilns located at stand-alone kiln-dried lumber manufacturing facilities or at any other type of facility) that are classified as major sources of HAP must submit an initial notification form, by January 26, 2005. Note that the Permittee submitted the required initial notification on December 13, 2004.

The NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD, promulgated in the Federal Register (FR 55218, September 13, 2004), is applicable to a boiler or process heater located at, or part of, a major source of hazardous air pollutants (HAP). Since the facility is a major for an individual HAP (methanol 12.24 tpy) and operates two existing, large, solid-fuel boilers, the MACT is applicable. The initial notification [40 CFR 63.7545(b)] was required to be submitted by March 12, 2005.

The Permittee submitted the initial notification dated February 16, 2005, regarding Boiler MACT applicability pursuant to 40 CFR 63.9(b), which was received by the Division on Feb. 25, 2005. The compliance date for existing sources is September 13, 2007.

Note that this permit does not contain any specific Boiler MACT requirements. However, it does require that if the facility wants to submit a Low-Risk Demonstration, it must be submitted before the compliance date; likewise for Site-Specific Test Plans and Averaging Demonstrations.

#### 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:

None applicable.

## B. Applicable Rules and Regulations

None applicable.

## C. Compliance Status

The facility is operating in compliance with the rules/regulations described above. No noncompliance issue exists; no compliance plan noted in form F.2.

## D. Operational Flexibility

None applicable.

## E. Permit Conditions

There are no facility wide conditions in Section 2 of this permit. Note that there are facility wide SIP rule standards in Section 8. The provisions regarding fugitive dust had been in Condition Nos. 2.3.1 and 2.3.2, in the initial Title V permit, but are now found in Section 8.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

The facility produces southern yellow pine dimensional lumber and timbers. Tree length pine logs are processed into dimensional lumber and timber, which is stacked, kiln dried, planed (smoothed 4 sides), sorted by length and grade, and packed for shipment by rail or truck. Sawdust and bark from the process is used on site and sold off site as fuel. Planer shavings from the planning process is sold off site for various uses.

#### 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
FOB1	Wood Waste Fired Boiler No. 1 (28.5 MMBtu/hr)	CFR 60, Subpart A 40 CFR 60, Subpart Dc 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDDD Georgia Rule 391-3-1-.02(2)(b) Georgia Rule 391-3-1-.02(2)(d) Georgia Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 6.1.7, 6.2.1	B1CY	Boiler 1 Multiclone
FOB2	Wood Waste Fired Boiler No. 2 (28.5 MMBtu/hr)	CFR 60, Subpart A 40 CFR 60, Subpart Dc 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDDD Georgia Rule 391-3-1-.02(2)(d) Georgia Rule 391-3-1-.02(2)(g)	3.3.1, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 3.5.1, 3.5.2, 4.2.1, 5.2.1, 5.2.2, 6.1.7, 6.2.1	B2CY	Boiler 2 Multiclone
FOK5	Drying Kiln No. 5	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD Georgia Rule 391-3-1-.02(2)(b) Georgia Rule 391-3-1-.02(2)(e)	3.3.2, 3.4.4, 3.4.5	None	None
FOK6	Drying Kiln No. 6	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD Georgia Rule 391-3-1-.02(2)(b) Georgia Rule 391-3-1-.02(2)(e)	3.3.2, 3.4.4, 3.4.5	None	None
FOPM	Planer Mill	Georgia Rule 391-3-1-.02(2)(b) Georgia Rule 391-3-1-.02(2)(e)	3.4.4, 3.4.5, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.2	PMBH	Planer Shavings Baghouse

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The heat input capacities of the boilers indicated above are the latest values provided in the renewal application.

#### C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 2421-049-0004-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to the narrative for that permit and the comments provided in the rules and regulations assessment found below.

### Rules and Regulations Assessment:

The renewal application indicates that the wood waste fired boilers were installed in years 1970 (FOB1)\* and 1994 (FOB2)\*. Both boilers were modified in 2000. With heat input capacities of 28.5 MMBtu/hr and 29.26 MMBtu/hr, each between 10 and 100 MMBtu/hr heat input capacity, and being modified or constructed after June 9, 1989, Boilers FOB1 and FOB2 are both subject to Subpart Dc. Because each boiler has an input heat capacity which is less than 30 MMBtu/hr, neither is subject to any Subpart Dc PM limit nor the Subpart Dc opacity limit. Because the boilers do not use any fossil fuel, neither is subject to the Subpart Dc sulfur dioxide limit. However, daily records of fuel usage are required to be kept. Both boilers are also subject to a PM limit in Georgia Rule 391-3-1-.02(2)(d) "fuel Burning Equipment." Note that both boilers are now subject to the post-1972 Rule (d) emission limits.

Please note that Georgia Rule 391-3-1-.02(2)(g) requires that all fuel burning sources below 100 million BTU's of heat input per hour shall not burn fuel containing more than 2.5 percent sulfur, by weight. Since wood waste (bark and sawdust) is the fuel for the boilers, the sulfur content will always be much less than 2.5%; hence no monitoring is needed. A new condition to limit the sulfur content in fuel is included in this permit renewal.

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*\*Note: A review of facility's files indicates that Boiler FOB1 was installed in 1970 and modified in 2000, and has a design heat input capacity of 28.5 MMBtu/hr. However, its maximum heat input capacity was indicated to be 30.5 MMBtu/hr in the initial Title V permit.*

*Regarding the boiler modification, the Permittee stated in a letter, received on August 15, 2005, that the cost of the boiler modification done in 2000 was \$359,285.01. This appears to be less than 50% of the cost of a new boiler. However, the cost of such a boiler has not been indicated in their letter. The narrative for permit amendment No. 2421-049-0004-V-01-1 dated August 14, 2000, indicates that the boiler modification was expected to reduce emissions from the boiler, while retaining the same rated heat input capacity. It is therefore, not clear whether boiler FOB1 was a modification. However, EPD is not disputing the company's claim that this boiler (FOB1) is now subject to NSPS. In that case, it is also subject to the state boiler rule for new units (after 1972) in Rule 391-3-1-.02(2)(d)(ii).*

*The heat input capacity of boiler FOB2 is apparently not 28.5 MMBtu/hr, as indicated in the renewal application or reported by their consultant. The design rated capacity of this boiler is 29.26 MMBtu/hr as revealed by the facility's files, and the permit amendment issued on July 8, 1994. This boiler was constructed in 1994, modified in 2000, and is subject to NSPS, as indicated in the initial Title V permit.*

Emission Units FOB1 and FOB2 (the boilers) are not subject to the provisions of 40 CFR Part 64, “Compliance Assurance Monitoring” (CAM), the purpose of which is to provide a reasonable assurance of compliance with emission limitations and standards for the anticipated range of operations at a pollutant-specific emission unit (PSEU) [§64.3(a)]. The determination for the non-applicability of CAM for the indicated emission sources is outlined below:

- They are located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- They are subject to emission limitation or standard. Rule (d) contains a limit for the regulated air pollutant (PM/PM10). [§64.2(a)(1)]
- They use a control device (Multiclone) to achieve compliance. [§64.2(a)(2)], but
- Potential pre-controlled emissions of the pollutant (PM/PM10) from neither boiler (Source Code FOB1 and FOB2) is 100 percent or more of the major source threshold. [§64.2(a)(3)]

In view of the above, both the boilers are not subject to CAM.

D. Compliance Status

The facility is operating in compliance with the rules/regulations described above. No noncompliance issue exists; no compliance plan was included form F.2.

E. Operational Flexibility

None applicable.

F. Permit Conditions

The existing permit conditions that apply to regulated equipment requirements and the changes made are summarized below. Please note that some of the existing conditions’ language is updated to the current standard language, even if there has been no change in rules and regulations.

Old Condition No. 3.3.1 had required the Permittee to comply with the provisions of the NSPS 40 CFR 60, Subpart Dc-“Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units,” for wood fired boiler FOB2. Note that existing Condition No. 3.3.1, which required the Permittee to keep operational and fuel burning record keeping, is shifted to Section 6.2 of the permit. New Condition 3.3.1 requires the Permittee to comply with all the applicable provisions of NSPS Subpart A and Subpart Dc for both boilers (FOB1 and FOB2).

Condition No. 3.3.2 requires the Permittee to comply with all the provisions of the NESHAP 40 CFR 63, Subparts A –“General provisions”, and Subpart DDDD-“Plywood and Composite Wood Products.” This is a new condition included in the renewal permit, based on the recent publication of NESHAP rules. Note that saw mills are not subject to any specific emissions limits or work practice requirements.

Condition No. 3.3.3 requires the Permittee to comply with all the provisions of the NESHAP 40 CFR 63, Subpart DDDDD-“Industrial, Commercial, and Institutional Boilers and Process

Heaters.” This is a new condition included in the renewal permit, based on the recent publication of that NESHAP. Please note that this MACT will be applicable on and after September 13, 2007. Therefore, a requirement to submit an application sufficiently in advance (180 days) for the compliance date is included in this condition, to ensure that the facility knows what their requirements are and EPD knows that the facility is in compliance.

New Condition 3.4.1 limits the PM emissions from the boilers (FOB1 and FOB2) based on Georgia Rule (d). This is similar to existing Condition No. 3.4.2. Note that existing permit Condition No. 3.4.1, which had subjected Boiler FOB1 to the pre-1972 Rule (d) emission limit, is not included in this renewal permit. Boiler FOB1, now subject to the post-1972 limits, has been moved into this new Condition 3.4.1.

New Condition 3.4.2 limits the visible emissions from the boilers (FOB1 and FOB2) to 20 percent opacity based on Georgia Rule (d). This is similar to existing Condition No. 3.4.3.

New Condition 3.4.3 limits the sulfur content of fuel to be burnt in the boilers (FOB1 and FOB2) to 2.5% based on Georgia Rule (g). This is a new condition.

New Condition 3.4.4 limits the PM emissions from the kilns (FOK5 and FOK6) and the planer mill (FOPM) based on Georgia Rule (e). This is similar to existing Conditions No. 3.4.5 and 3.4.6, combined.

New Condition 3.4.5 limits the visible emissions from the kilns (FOK5 and FOK6) and the planer mill (FOPM), each, to 40 percent opacity based on Georgia Rule (e). This is similar to existing Condition No. 3.4.4.

Condition No. 3.5.1 requires that routine maintenance be done on all air pollution control equipment and that records be maintained for inspection. This condition is based on Georgia Rule 391-3-1-.02(2) (a) 10. This is a new condition.

Condition No. 3.5.2 requires the Permittee to operate each air pollution control device, including baghouse, multiclones, and cyclones, which control particulate matter, when its associated process is operating. This condition is based on Georgia Rule 391-3-1-.03(2)(c). This is a new condition.

**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 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****1. Individual Equipment**

None applicable.

**2. Equipment Groups (all subject to the same test requirements):**

Testing requirements specified in Permit No. 2421-049-0004-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Condition No. 4.2.1, which requires periodic testing of the boilers (FOB1 and FOB2) is retained.

## 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

#### 1. Individual Equipment:

None applicable.

#### 2. Equipment Groups (all subject to the same monitoring requirements):

Monitoring requirements specified in Permit No. 2421-103-0004-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative

The wood waste fired boilers (FOB1 and FOB2) are subject to Georgia Rule 391-3-1-.02(2)(d) for Particulate Matter (PM) and Opacity. A dedicated Multiclone (APCD ID Nos. B1CY and B2CY) controls PM emissions from each of these boilers. Proper operation and maintenance of this air pollution control equipment will ensure that the emissions are minimized and within allowable limits. Weekly inspections of the multiclones are required to assure that proper operation and maintenance is taking place. To make certain that the multiclones are operating properly, pressure drop must be monitored at least once per shift; any malfunctions must be corrected in an expedient manner; and any adverse condition(s) discovered are required to be reported, in accordance to 6.1.7(c), as excursions.

New Condition 5.2.1 requires the Permittee to maintain monitoring devices and data records of the pressure drop across the boilers' multiclones (B1CY and B1CY) and Planer Shavings Baghouse (PMBH), to be recorded at least once per shift. This is similar to what existing Conditions No. 5.2.1, 5.2.2 and 5.2.3 required.

New Condition No. 5.2.2 requires the Permittee to make weekly inspections of the multiclones, to determine if it is malfunctioning and to make repairs in an expedient manner. This is a new condition.

Condition No. 5.2.3 requires the Permittee to make weekly inspections of the baghouse, to determine if it is malfunctioning and to make repairs in an expedient manner. This is existing Condition No. 5.2.6.

New Condition No. 5.2.3 requires the Permittee to make weekly inspections of the chip conveyors, hoppers and transfer points, to ensure that the chip loading station is operating efficiently and to make maintenance repairs in an expedient manner. This is a new condition, included at the recommendation of the EPD Coastal District-Brunswick office.

Note that existing permit Condition No. 5.2.8, which required the Permittee to report excessive emissions, exceedances, and excursions, has been moved to Section 6 “Record keeping and reporting Requirements”, as Condition No. 6.1.7.

Also, existing permit Conditions No. 5.3.1 through 5.3.4 in Section 5.3 (Record keeping and Reporting requirements) have been moved to Section 6, as per the latest Title V permit template.

C. Compliance Assurance Monitoring (CAM)

As discussed in Section III.C of this permit narrative, Emission Units FOB1 and FOB2 are not subject to the CAM rule, nor any other emission units.

**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 semiannual basis.

**B. Specific Record Keeping and Reporting Requirements**

Record keeping and reporting requirements specified in Permit No. 2421-103-0004-V-02-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Modified Condition No. 6.2.1 requires the Permittee to keep operational records of the boilers (FO1 and FOB2) which includes the quantity of wood waste or other fuel combusted daily as required by NSPS rules. This is similar to existing Condition No. 3.3.1.

To allow the Division to make sure that fugitive dust rules are being complied with, Condition 6.2.2 requires the Permittee to maintain a record of all actions taken to suppress fugitive dust to help assure compliance with Rule (n). This is existing Condition No. 5.3.4.

## VII. Specific Requirements

### A. Operational Flexibility

- Operational flexibility does not need to be incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V permit application. Special operational flexibility has not been incorporated into this Title V permit. However, this Title V permit allows the operational flexibility, which is generally afforded to most sawmills. For example, they have the flexibility such that (1) different species of wood can be dried in the kiln and (2) the kilns can be used to dry lumber with various dimensions.

### B. Alternative Requirements

- There are no alternatives requirements that need to be incorporated into the Title V permit.

### C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/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

- There is no request to operate any temporary sources.

### E. Short-Term Activities

- The Permittee has included the following activities in Form D5:
  - 1) End Spray (lumber),
  - 2) Fire Protection Diesel Pump,
  - 3) Log Count Spray (Scale house),
  - 4) Saw/Knife Grinding, and 5) Welding.

### F. Compliance Schedule/Progress Reports

- The facility indicates in their Title V application that it is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports were necessary.

## G. Emissions Trading

- None applicable.

## H. Acid Rain Requirements

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

## I. Stratospheric Ozone Protection Requirements

- International Paper-Folkston Lumber has indicated that they are subject to Title VI. This facility has air conditioners or refrigeration equipment that uses CFC's, HCFC's or other stratospheric ozone depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B. The facility is subject to 40 CFR Part 82, Subpart A "Production and Consumption Control", Appendix A and B. The Title V permit application indicates that the facility do not have any air conditioner or any piece of refrigeration equipment that contain refrigerant charge of greater than 50 lbs. The Title V permit application also indicates that the facility personnel do not maintain, service, repair or dispose of any motor vehicle air conditioners (MVAC's) or appliances. Therefore, the facility is not subject to 40 CFR 82, Subpart B "Servicing of Motor Vehicle Air Conditioners."
- The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since this facility has at least some air conditioners, chillers, and refrigerators, Subpart F is an applicable requirement.

## J. Pollution Prevention

None Applicable.

## K. Specific Conditions

None 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.

The following Conditions, No. 8.23 through 8.2.6, are added to the permit, as per requirements of U.S. EPA. These are in the latest Title V template and are not there in the current permit.

- 1) Condition No. 8.23 for “Solvent Metal Cleaning”,
- 2) Condition No. 8.24 for “Incinerators”,
- 3) Condition No. 8.25 for “Volatile Organic Liquid Handling and Storage” and
- 4) Condition No. 8.26 for “Use of Any Credible Evidence or Information.”

**Addendum to Narrative**

The 30-day public review for draft Part 70 permit for International Paper-Folkston Lumber started on November 30, 2005 and ended on December 30, 2005. No comments were received by EPD from the facility, the public or EPA.