

Facility Name: **Norbord Georgia, Inc.**
 City: Cordele
 County: Crisp
 AIRS #: 04-13-081-00054

PSD Permit Application #: 15812 (Received November 9, 2004)
 Title V Permit Application #: TV-15812 (Received November 9, 2004)
 Date of Draft Title V/PSD Permit: April 2005
 Permit No: 2493-081-0054-V-02-1

Program	Review Engineers	Review Managers
SSPP/ASU	Susan Jenkins	John Yntema
SSCP/ASU	Bob Shih	Douglas Waldron
ISMP	Bob Scott	Richard Taylor
Toxics	Not Applicable	Not Applicable

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 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 is to consolidate and identify existing state and federal air requirements applicable to Oglethorpe Power Company – Wansley Combined Cycle Energy Facility 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: Norbord Georgia, Inc.
2. Parent/Holding Company Name: Norbord Georgia, Inc.
3. Previous and/or Other Name(s)
Previously known as Masonite Corporation and International Paper
4. Facility Location
964 Highway 280 West, Cordele, Crisp County, Georgia 31015
5. Attainment or Non-attainment Area Location
Crisp County is an attainment area for all criteria air pollutant.
6. Class I Area Impacts
The facility is not located within 100 km of a Class I Area, but is within approximately 200 km of the Okefenokee National Wildlife Refuge (at 170 km); Bradwell Bay Wilderness Area (at 205 km); and Saint Marks National Wildlife Refuge (at 205 km).

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 permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2493-081-0054-V-02-0	June 25, 2002	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2493-081-0054-V-02-0	Initial Title V Permit

D. Process Description

1. SIC Codes(s): 2493
2. Description of Product(s): Oriented Strandboard
3. Overall Facility Process Description

Refer to PSD Preliminary Determination which is an attached document to this Title V narrative.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Refer to PSD Preliminary Determination.

2. Title V Major Source Status by Pollutant

The Title V Major Source Status by Pollutant is specified in the following table for the Title V Site defined in narrative section I.B.

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	na			X
H ₂ S	na			X
Individual HAP	X	X		
Total HAPs	X	X		

3. MACT Standards

This Title V site is a major source of hazardous air pollutants (HAPs) and the site is subject to 40 CFR Part 63 Subpart DDDD – Plywood and Composite Wood Products. The proposed expansion is also a major source of HAPs and the proposed expansion is to be regulated as an *existing affected source*. The existing and proposed facility have a Part 63 compliance date of October 1, 2007.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
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

Refer to PSD Preliminary Determination.

III. Regulated Equipment Requirements

Refer to PSD Preliminary Determination.

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

A. General Testing Requirements

This facility is required to perform emissions testing. The test methods to be used to determine compliance with the limitations in Part 3 are listed and a general condition requiring notification of any test and submission of a test plan are also provided.

B. Specific Testing Requirements

Refer to PSD Preliminary Determination.

V. Monitoring Requirements (with Associated Record Keeping and Reporting)**A. General Monitoring Requirements**

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns and repairs. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should be recorded during any calibration activities to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

Refer to PSD Preliminary Determination.

VI. Other Record Keeping and Reporting Requirements**A. General Testing 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 related information to deviations from 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 Testing Requirements

Refer to PSD Preliminary Determination.

VII. Specific Requirements**A. Operational Flexibility**

This permit includes the standard conditions allowing section 502(b)(10) changes and off-permit changes. Additional operational flexibility provisions do not need to be incorporated into this Title V Permit as their permit already provides sufficient flexibility for the facility. The applicant did not include any alternative operating scenarios in their Title V permit application.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

A list of insignificant activities is attached at the end of the Title V Permit. These insignificant emission units may also be seen in Section 4.10 and 4.50 of the Title V Permit Application.

D. Temporary Sources

This section is not applicable to this facility. 40 CFR 70.6(e) requires Georgia EPD to provide for the permitting of certain types of temporary sources. This facility currently has no such sources and is unlikely to have such sources in the future. However, they may add temporary sources provided that the facility follows any necessary regulatory procedures for the operation of such sources. This may include amending the Title V permit, if necessary.

E. Short-Term Activities

The facility has not requested to operate any short-term activities.

F. Compliance Schedule/Progress Reports

The facility is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

G. Emissions Trading

The facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

The proposed expansion is not subject to the Acid Rain Requirements.

I. Prevention of Accidental Releases

The proposed expansion is not subject to the requirements of 40 CFR 68.

J. Stratospheric Ozone Protection Requirements

The facility indicated that they are subject to 40 CFR 82 Subpart F.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions

None

XIII. 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.

Addendum to Narrative

A public notice was placed in the *Cordele Dispatch* (legal organ for Crisp County) on April 21, 2005. The 30-day public review period ended on May 21, 2005. During that period, comments were received by the Division from the facility and USEPA Region 4. There were no comments submitted by the general public. The facility's comments and the Division's responses can be found in the Prevention of Significant Deterioration Final Determination.