

Part 70 Operating Permit Amendment

Permit Amendment No.: 2493-157-0014-V-02-1 Effective Date: May 15, 2007

Facility Name: Huber Engineered Woods LLC

Facility Address 1442 Highway 334
Commerce, GA 30529, Jackson County

Mailing Address: P.O. Box 670
Commerce, GA 30529

Parent/Holding Company: J.M. Huber Corporation

Facility AIRS Number: 04-13-157-00014

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Modification to the performance testing [deadlines](#). [The revised testing deadlines now](#) correspond with the performance testing deadlines in Permit Amendment No. 2493-157-0014-V-01-9.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2493-157-0014-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit no. 2493-157-0014-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-17376 dated May 1, 2007; any other applications upon which this Permit Amendment or Permit No. 2493-157-0014-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 pages.

Director
Environmental Protection Division

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PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements**

4.2.1 The Permittee shall conduct performance tests by June 13, 2007, to verify that the following fourteen (14) emission factors for VOC, NO_x, PM, and CO are not being exceeded. These performance tests must be performed while operating according to each of the following RTO combinations: 1) SRTO and HRTO and 2) SRTO and PRT0, or an alternative test strategy approved by the Division. Following these initial tests, subsequent performance tests shall be conducted every 12 months.

If a tested emission rate is 75% or less of the emission factor, the testing frequency can be reduced to once every 36 months, but will go back to once every 12 months if a subsequent test result is over 75% of the emission factor.

If a test shows that emissions were above 75% of the emission factor specified below, the Permittee may propose a new factor that is at least 33.3% higher than the tested result and, if acceptable to the Division, may then wait up to 36 months until the next test.

Conversely, if a test shows that emissions were less than 75% of the emission factor used, the facility may submit information to the Division substantiating a reduction in the emission factor used in the emission calculations, and requesting that the permit be modified to reflect this.

For the MUPF factors, the Permittee will have one year from the date that MUPF resins are first used in the facility processes to verify that the emission factors are not being exceeded.
[391-3-1-.02(6)(b)1(i)]

$$EF_{\text{DRYR-MDI-NO}_x} = 0.938 \text{ lb/ODT}$$

$$EF_{\text{DRYR-MUPF-NO}_x} = 0.787 \text{ lb/ODT}$$

$$EF_{\text{BP-MDI-NO}_x} = 0.055 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

$$EF_{\text{BP-MUPF-NO}_x} = 0.281 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

$$EF_{\text{DRYR-MDI-CO}} = 0.54 \text{ lb/ODT}$$

$$EF_{\text{DRYR-MUPF-CO}} = 0.65 \text{ lb/ODT}$$

$$EF_{\text{BP-MDI-CO}} = 0.043 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

$$EF_{\text{BP-MUPF-CO}} = 0.122 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

$$EF_{\text{DRYR-MDI-VOC}} = 0.40 \text{ lb/ODT}$$

$$EF_{\text{DRYR-MUPF-VOC}} = 0.575 \text{ lb/ODT}$$

$$EF_{\text{BP-MDI-VOC}} = 0.050 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

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$$EF_{BP-MUPF-VOC} = 0.130 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

$$EF_{DRYR-PM} = 0.48 \text{ lb/ODT}$$

$$EF_{BP-PM} = 0.036 \text{ lb/MSF } (\frac{3}{8}\text{inch})$$

- 4.2.3 The Permittee shall conduct performance tests by June 13, 2007, to verify that actual emission rates of Phenol, Formaldehyde and Methanol are below the following rates at the maximum production rate using the resin with the highest concentration of each pollutant. If the facility begins to use a new resin, which is likely to cause significantly higher emissions of one or more of the pollutants, the facility shall notify the Division prior to its use; additional testing may be required. These performance tests must be performed while operating according to each of the following RTO combinations: 1) SRTO and HRTO and 2) SRTO and PRT0, or an alternative test strategy approved by the Division. Should the performance tests reveal emission rates of methanol and naphthalene are an order of magnitude above those requested, the Division may require additional modeling to verify that the facility will not exceed the acceptable ambient concentrations (AAC) while using the new emission rate(s).

[391-3-1-.02(6)(b)1(i)]

a. Board Press

- i. Phenol: 3.04 lb/hr
- ii. Formaldehyde: 4.34 lb/hr
- iii. Methanol: 0.6 lb/hr

b. Dryers

- i. Phenol: 3.84 lb/hr
- ii. Formaldehyde: 5.98 lb/hr
- iii. Methanol: 0.80 lb/hr