

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Facility Name: **Louisiana-Pacific Corporation - Athens Oriented Strandboard Mill**

City: Athens

County: Jackson

AIRS #: 04-13-157-00015

Application #: 11716

Date SIP Application Received: October 1, 1999

Date Title V Application Received: October 1, 1999

Permit No: 2493-157-0015-V-01-1

Program	Review Engineers	Review Managers
SSPP	Joe Aisien	John Yntema
SSCP	Richard McDonald	Lou Musgrove
ISMP	Bob Scott	Richard Taylor
TOXICS	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached 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 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 participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

2493-157-0015-V-01-0 August 17, 1999

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2493-157-0015-V-01-0	08/17/99		T

Table 2: Comments on Specific Permits

Permit Number	Comments

B. Regulatory Status

1. PSD/NSR

This facility is a minor source with regards to the New Source Review (NSR) Prevention of Significant Deterioration of air quality (PSD) rules. All of its emissions are below 250 tons per year. Note: Facility is not one of the 28 source categories whose major source threshold is 100 tons per year. This facility ceased to be a major source after Louisiana Pacific Corporation (LP) installed Regenerative Thermal Oxidizers (RTOs) on its dryers and board press to control Volatile Organic Compounds (VOCs), Particulate Matter (PM), and Carbon monoxide (CO) in line with the requirements of consent decree, Civil Action No. CV93-0869 signed in 1993. The following conditions limit the facility from being classified as a NSR PS major source: 3.2.1, 3.2.3, 3.2.5, 3.2.6, 3.2.7, and 3.2.8.

This facility is not located in a non-attainment area. Therefore, there are no limits in the existing permit(s) avoid VOC or NO_x RACT.

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	Yes	Yes	No	No
PM ₁₀	Yes	Yes	No	No
SO ₂	Yes	No	No	Yes
VOC	Yes	Yes	No	No
NO _x	Yes	Yes	No	No
CO	Yes	Yes	No	No
TRS	Yes	No	No	Yes
H ₂ S	Yes	No	No	Yes
Individual HAP	Yes	No	No	Yes
Total HAPs	Yes	No	No	Yes

The facility is not requesting a Synthetic Minor (SM) Status through this amendment for any pollutant.

II. Proposed Modification

A. Description of Modification

The modification includes: (1) A reduction in the press room enclosure and a reconfiguration of the pick-up point and ductwork from the enclosure to the Regenerative Thermal Oxidizer (RTO-3), thereby improving its capture vapors, (2) The removal of the duct which transfers paint booth exhaust from the Edge Seal Application Booth to RTO-3, and (3) The cancellation of the planned relocation of the Screen Fines Baghouse to the Raw Fuel Bin which has been indicated in the Title V application update dated April 15, 1999.

B. Emissions Change

The pollutants whose emissions will increase include PM and VOCs. The emission changes were determined by comparing the actual and potential emissions of the latest application dated October 1, 1999, to the actual and potential emissions of the next to last application dated April 14, 1999. Table 4 summarizes the net increases/decreases in potential and emissions due to the change.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
PM	Yes	+1.0	+1.0	Yes
PM ₁₀	Yes	+1.0	+1.0	Yes

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)	Increase Less Than Minor Mod Threshold (y/n)
SO ₂	Yes	+0	+0	Yes
VOC	Yes	+4.6	+4.6	Yes
NO _x	Yes	+0	+0	Yes
CO	Yes	+0	+0	Yes
TRS	Yes			
H ₂ S	Yes			
Individual HAP	Yes	+0	+0	Yes
Total HAPs	Yes	+0	+0	Yes

C. PSD/NSR Applicability

Since the source is not major with regards to NSR PSD, the emissions of any of the criteria pollutants has to increase by at least 250 tons per year to trigger PSD. No pollutant is increasing by that much, so PSD is not an issue (See Table 4).

III. Facility Wide Requirements

No changes

IV. Regulated Equipment Requirements

A. Process Description Changes

The Equipment Group PREP is affected by this modification. The original Title V permit application included the screeners and their associated baghouse which was incorrectly designated as C012 (It was actually C011). In its April 15, 1999 Title V update, LP had indicated that they planned to eliminate the Screen Fines Transfer Baghouse designated as C011. On this basis, the Title V permit was issued without considering the Screen Fines Transfer baghouse. LP has reversed this decision and wants the Screen Fines Transfer baghouse to remain in the PREP group. Note: The screeners are grouped under DRY1 (flake screening). The wood fines generated at the screeners are captured by the Screen Fines Transfer Baghouse and the Raw Fuel Bin Baghouse before storage in the Raw Fuel Bin. Wood fines for the dryer fuel system are obtained from the board finishing and the dryer rotary screen operations. The PREP group (and the associated baghouses C011, C012, and CP006) prepares the fuel for the rotary dryers. Hence baghouse C011 is in the PREP group even though it would seem logical to have it (C011) in the DRY1 group.

B. Equipment List Changes

The emission units which comprise the equipment group PREP include the flying cutoff saws, the edge trim saws, the cross cut saws, the mat reject system, the sander, and the tongue and groove operation. The pollutants emitted by this group include PM and VOCs.

C. Equipment & Rule Applicability Changes

This modification is to sources affected by Rule 391-3-1-.03(2)(c) [PSD Avoidance], Georgia Rule(e) "Particulate Emission from Manufacturing Processes", and Rule (b) "Visible Emissions".

! All the equipment groups, including PREP have emission rate caps to avoid PSD. Specifically, the emission rates for PM and VOCs from PREP are capped for PSD avoidance purposes.

Emission and Operating Standards: The new allowable emission rate for the PREP group is as follows:

- a. PM not to exceed 8.24 pounds per hour.
- b. VOCs not to exceed 11.41 pounds per hour.

D. Compliance Status

No Change

E. Operational Flexibility

No change

F. Permit Conditions

Only equipment in the PREP Group is affected by this modification. Conditions 3.2.5, 5.2.3, 5.2.4, and 5.2.5 have been modified to reflect the higher emission rates for PM and VOCs, and also to reflect the presence of the screener fines transfer baghouse C011.

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

A. No change

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

A. None

B. None

VI. Other Record Keeping and Reporting Requirements

No change to permit conditions

VII. Specific Requirements

No change to permit conditions

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Closing Block: We have reviewed and recommend issuance of draft/proposed Permit No. 2493-157-V-01-1

Program	Review Engineers	Dates	Review Managers	Dates
SSPP				
SSCP				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date