

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 #: 12052

Date SIP Application Received: February 15, 2000

Date Title V Application Received: February 15, 2000

Permit No: 2493-157-00015-V-01-2

| 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

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 | August 17, 1999 | | T |
| 2493-157-0015-V-01-1 | February 23, 2000 | T | |

Table 2: Comments on Specific Permits

| Permit Number | Comments |
|----------------------|---|
| 2493-157-0015-V-01-1 | Minor modification to include Screener Fines Transfer Baghouse in the PREP group and to change the press room ventilation system. |

II. Proposed Modification

A. Description of Modification

The modification is to allow Louisiana-Pacific Corporation (L-P) to replace existing monitoring conditions with conditions which conform to L-P’s Parametric Monitoring Implementation Plan which was a requirement of the Clean Air Act Enforcement Action - *United States v. Louisiana-Pacific Corporation* No. CV93-0869 (W.D. LA), and the first amendment to Consent Decree, Paragraph 74. Also, this modification will allow L-P to conduct performance test(s) to identify parametric thresholds for Regenerative Thermal Oxidizer (RTO) retention chamber temperature and stack air flow.

Note: The Industrial Source Monitoring Program (ISMP) has determined that the replacement of the existing monitoring conditions with conditions which conform to L-P’s Parametric Monitoring Implementation Plan is “insignificant” as far as Title V modifications are concerned (see memo from Richard Taylor). Therefore this modification is considered a “minor modification without construction”.

B. Emissions Change

There will be no increase in emissions of any of the pollutants. Table 4 should summarize 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 | 0 | 0 | n/a |

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 ₁₀ | yes | 0 | 0 | n/a |
| SO ₂ | yes | 0 | 0 | n/a |
| VOC | yes | 0 | 0 | n/a |
| NO _x | yes | 0 | 0 | n/a |
| CO | yes | 0 | 0 | n/a |
| TRS | yes | 0 | 0 | n/a |
| H ₂ S | yes | 0 | 0 | n/a |
| Individual HAP | yes | 0 | 0 | n/a |
| Total HAPs | yes | 0 | 0 | n/a |

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. There is no increase in emissions of any of the pollutants, s PSD is not an issue (See Table 4).

III. Facility Wide Requirements

No changes

IV. Regulated Equipment Requirements

None

D. Compliance Status

No change

E. Operational Flexibility

No change

F. Permit Conditions

Note: In lieu of continuous emission monitoring and in line with the Consent Decree, L-P is proposing to substitute parametric monitoring. In particular, L-P has identified operating temperature and volumetric flow rate as good indicators of RTO performance. The higher the temperature in the combustion chamber, the greater the destruction of VOCs. Also, for a given temperature, the longer the retention time in the combustion chamber, the greater the destruction of VOC. The retention time in the combustion chamber is indicated by the volumetric flow rate. For a given volume, as the volumetric flow rate increases, the retention time decreases: ($Q=V/t$). Also, the volumetric flow rate depends on the number of dryers and presses in operation- the greater the number of dryers and presses in operation, the greater the volumetric flow rate. To establish the worst case situation, all five dryers will be in operation during the performance test. This will establish the upper bound of the volumetric flow rate and hence the worst case VOC emission rate.

Condition 3.2.10 is added to allow L-P to furnish wood simultaneously to five dryers in Equipment Group DRY1 during the performance test(s) which are done to identify parametric thresholds for retention chamber temperature and stack air flow. During the performance test(s), Condition 3.2.9 is superseded by Condition 3.2.10.

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

A. No change

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

- A. Condition 5.2.1a. is replaced. The new condition requires the Permittee to measure the gas stream flow rate in the stack of each RTO (RTO-1, RTO-2, and RTO-3).

Condition 5.2.2 is replaced. In addition to requiring an hourly record of the number of wet wafer bin bottom belts that are moving, the new condition also requires the recording, on an hourly basis, of the gas stream static pressure at the inlet of each RTO (RTO-1, RTO-2, and RTO-3) and the operating mode of each RTO by-pass damper.

Condition 5.2.8c. is replaced. 5.2.8c.i. requires the reporting of any 15-minute period during which the average combustion zone temperature dropped below the compliance limit established for any RTO. 5.2.8c.ii. requires the reporting of any 15-minute period during which the average gas stream flow rate rises above the compliance limit established for any RTO. 5.2.8c.iii. requires the reporting of any 1-hour period during which the number of wafer wet bin bottom belts moving to deliver furnish to the dryers in Equipment Group DRY1 rises above four. 5.2.8c.iv. requires the reporting of any 1-hour period during which the average gas stream pressure at the inlet of any RTO (RTO-1, RTO-2, and RTO-3) is not less than 0.0 inches of water column. 5.2.8c.v. requires the reporting of any period of operation in which dryer or press exhaust gases are passed directly to the atmosphere.

Condition 5.3.1 is changed to reflect quarterly reporting as described in the Parametric Monitoring Implementation Plan submitted to the EPA.

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. [Permit No]

| Program | Review Engineers | Dates | Review Managers | Dates |
|---------------|------------------|-------|-----------------|-------|
| SSPP | | | | |
| SSCP | | | | |
| ISMP | | | | |
| TOXICS | | | | |

Stationary Source Permitting Program Manager

Date