

Facility Name: **Jordan Forest Products**
 City: Barnesville
 County: Lamar
 AIRS #: 04-13-171-00005

Application #: TV-16803
 Date Application Received: June 28, 2006
 Permit No: 2421-171-0005-V-03-0

| Program | Review Engineers | Review Managers |
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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 **Jordan Forest Products** 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**

Jordan Forest Products

2. Parent/Holding Company Name

Jordan Lumber and Supply

3. Previous and/or Other Name(s)

Weyerhaeuser Company – Barnesville Wood Products
The Buckeye Cellulose Corporation

4. Facility Location

752 Grove Street
Barnesville, Georgia 30204

5. Attainment, Non-attainment Area Location, or Contributing Area

This facility is located in Lamar County which is in attainment for all criteria pollutants. Lamar County is in the 32-county area near Atlanta which is subject to additional VOC and NOx control rules.

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 |
|--|--------------------------------|--|
| 2421-171-0005-V-02-0 | December 13, 2004 | Ownership change from Weyerhaeuser Company to Jordan Lumber and Supply, and authorized construction of Kiln #3 (wood-fired) and changing Kilns #1 and #2 from gas-fired to wood-fired. |
| 2421-171-0005-V-02-1 | August 3, 2006 | Replacement of the planer mill hog. |

D. Process Description

1. SIC Codes(s)

2421

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility produces rough and finished lumber.

3. Overall Facility Process Description

Tree-length and precut logs are received and sent to the log processing area where the bark is removed by debarkers and transported to a hog where the bark is reduced to a uniform size and then conveyed to an overhead truck-loading bin, or used as fuel. The debarked logs are processed through the log yard and sawmill. The unusable ends are removed, chipped and sent to an overhead truckloading bin or railcar-loading bin for use at pulp and paper mills. Each log is then sawed to the desired dimension rough lumber, which is conveyed to the green sorter where it is sorted by size and length. The sawdust generated by the sawmill is transported via a conveyor to an overhead truck-loading bin. The sorted green lumber is stored on carts and loaded into one of three direct wood fired kilns for drying. The dried lumber from the kilns is sent to the planer mill where the rough surfaces are smoothed, graded, and trimmed. The trimmed ends are then hogged and conveyed, along with the planer shavings, to an overhead truck-loading bin with a baghouse. The finished lumber is packaged and then shipped off-site.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

This facility is a major source with regard to the Prevention of Significant Deterioration of Air Quality (PSD) regulations. The facility is major for Volatile Organic Compounds (VOC). The Potential to Emit (PTE) for this pollutant is greater than the PSD threshold of 250 tons per year (ton/yr).

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 ₁₀ | ✓ | ✓ | | |
| SO ₂ | ✓ | | | ✓ |
| VOC | ✓ | ✓ | | |
| NO _x | ✓ | | | ✓ |
| CO | ✓ | | | ✓ |
| TRS | N/A | | | |
| H ₂ S | N/A | | | |
| Individual HAP | ✓ | ✓ | | |
| Total HAPs | ✓ | ✓ | | |

3. MACT Standards

This facility is subject to 40 CFR 63, Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.” The only requirement applicable to Jordan Forest Products is the initial notification requirement which was satisfied by a letter dated October 11, 2006.

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 | no |
| 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

The facility is subject to 40 CFR 63, Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.”

C. Compliance Status

The facility is in compliance at this time.

D. Operational Flexibility

None applicable.

E. Permit Conditions

New Conditions 2.2.1 and 2.2.2 apply requirements of 40 CFR Part 63 Subpart A – “General Provisions” and 40 CFR 63, Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” to the entire facility.

III. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 2421-171-0005-V-02-0. Please refer to the narrative of that permit.

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 |
| 500A | Lumber Drying Kiln #1 | 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) | 3.2.1, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.2, 6.2.4 | N/A | N/A |
| 500B | Lumber Drying Kiln #2 | 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) | 3.2.1, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.2, 6.2.4 | N/A | N/A |
| 500C | Lumber Drying Kiln #3 | 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) | 3.2.2, 3.4.1, 3.4.2, 3.4.3, 6.1.7, 6.2.3, 6.2.5 | N/A | N/A |
| 700 | Planer Mill | 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) | 3.4.1, 3.4.2 | N/A | N/A |
| 701 | Planer Hog | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7 | 701A | Baghouse |
| 900 | Overhead Truck Loading Bin | 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) | 3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.3, 6.1.7 | 901 | Truck Loading Baghouse |

C. Equipment & Rule Applicability

Emission and Operating Caps:

See the narrative for Permit 2421-171-0005-V-02-0 for a detailed discussion of the operating caps for Kilns #1, #2, and #3.

Rules and Regulations Assessment:

See the narrative for Permit 2421-171-0005-V-01-0 for a detailed discussion of the rules and regulations for most of the equipment at this facility. The narrative for Permit 2421-171-0005-V-02-0 discusses the switch of fuels for Kilns #1, #2, and #3 from natural gas to wood. The narrative for Permit 2421-171-0005-V-02-1 discusses the replacement of the planer hog and the rules applicable to the planer hog.

The narrative for Permit 2421-171-0005-V-01-0 included a discussion of emissions from the paved roads at the facility. Revisions to the emission factor used and the procedures to calculate potential to emit (PTE) from the paved roads were finalized in November 2006 (AP-42 Section 13.2.1). These revisions reduced the PTE from paved roads to less than 25 tons per year. As a result, the paved roads have been moved to the Generic Emission Groups in Attachment B of the permit.

D. Compliance Status

The facility is in compliance at this time.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.2.1 contains the production limit for Kilns #1 and #2, combined. This condition is carried over from Condition 3.2.1 in Permit 2421-171-0005-V-02-0.

Condition 3.2.2 contains the production limit for Kiln #3. This condition is carried over from Condition 3.2.2 in Permit 2421-171-0005-V-02-0.

Condition 3.4.1 establishes Rule (e) as applicable to the lumber kilns, planer mill, planer hog, and overhead truck loading bin. This condition combines Condition 3.4.1 in Permit 2421-171-0005-V-02-0 and Condition 3.4.6 in Permit 2421-171-0005-V-02-1.

Condition 3.4.2 establishes Rule (b) as applicable to the lumber kilns, planer mill, planer hog, and overhead truck loading bin. This condition combines Condition 3.4.2 in Permit 2421-171-0005-V-02-0 and Condition 3.4.7 in Permit 2421-171-0005-V-02-1.

Condition 3.4.3 establishes Rule (g) as applicable to the lumber kilns. This condition is carried over from Condition 3.4.5 in Permit 2421-171-0005-V-02-0.

Condition 3.5.1 requires that an adequate supply of baghouse bags be on hand. This condition is carried over from Condition 3.5.1 in Permit 2421-171-0005-V-02-0.

Conditions 3.4.3 and 3.4.4 from Permit 2421-171-0005-V-02-0 have been removed. These conditions were for the paved roads at the plant which, as explained in Section III.C., have been moved to the Generic Emission Groups. The Generic Emission Groups are subject to conditions in Section 8 of this permit, so these conditions are no longer needed.

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 (or sixty (60) days for tests required by 40 CFR Part 63) 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

None applicable.

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

Monitoring requirements specified in Permit No. 2421-171-0005-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative. The monitoring for the replacement planer hog is discussed in the narrative to Permit 2421-171-0005-V-02-1.

Condition 5.2.1 requires the installation of pressure drop meters across the planer mill baghouse and the overhead truck loading bin baghouse. This condition combines the requirements of Condition 5.2.1 in Permit 2421-171-0005-V-02-0 and Condition 5.2.4 in Permit 2421-171-0005-V-02-1.

Condition 5.2.2 requires daily VE checks of the exhaust of the planer mill baghouse and the overhead truck loading bin baghouse. This condition combines the requirements of Condition 5.2.2 in Permit 2421-171-0005-V-02-0 and Condition 5.2.5 in Permit 2421-171-0005-V-02-1.

Condition 5.2.3 requires the Permittee to follow a Preventative Maintenance Plan for the planer mill baghouse and the overhead truck loading bin baghouse. This condition combines the requirements of Condition 5.2.3 in Permit 2421-171-0005-V-02-0 and Condition 5.2.6 in Permit 2421-171-0005-V-02-1.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

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

Condition 6.1.7 combines the exceedances and excursions that must be reported from Condition 6.1.7 in Permit 2421-171-0005-V-02-0 and Condition 6.1.8 in Permit 2421-171-0005-V-02-1. This condition carries over the kiln throughput totals in Condition 6.1.7d. i. and ii. from Permit 2421-171-0005-V-02-0.

Condition 6.2.1, requiring that records of all maintenance be kept, is carried over from Condition 6.2.1 in Permit 2421-171-0005-V-02-0.

Conditions 6.2.2 through 6.2.5, requiring monthly tracking of lumber throughput in the kilns, are carried over from the same condition numbers in Permit 2421-171-0005-V-02-0.

Existing Condition 6.2.6 from Permit 2421-171-0005-V-02-0, which required records of actions taken to minimize fugitive dust, was removed due to paved roads being moved to Generic Emissions Groups in this permit (as discussed in Section III.C.).

Existing Condition 6.2.7, which requires written notification of the startup of Kiln #3, was removed because the condition has been satisfied.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

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

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

The facility has not indicated that they are subject to Title VI.

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.

Addendum to Narrative

The 30-day public review started on October 27, 2007 and ended on November 26, 2007. Comments were not received by the Division.