

Facility Name: **Southern Reman, Inc.**
 City: Valdosta
 County: Lowndes
 AIRS #: 04-13-185-00094

Application #: TV-9333
 Date Application Received: October 22, 1996 (Updated March 16, 2000)
 Date Application Deemed Administratively Complete: April 11, 1997
 Date of Draft Permit: []
 Permit No: 2421-185-0094-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Joe Aisien	John Yntema
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ISMP	Bradley Belflower	Larry Webber
Toxics	N/A	N/A

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached operating permit amendment. 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. 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 following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. The purpose of this narrative is to provide information only. 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: Southern Reman, Inc.

2. Parent/Holding Company Name

Langdale Industries, Inc.

3. Previous and/or Other Name(s)

None

4. Facility Location

1130 Old Clyattville Road
Valdosta, Georgia 31603

5. Attainment or Non-attainment Area Location

The facility is located in Lowndes County which is in attainment for all criteria pollutants. Lowndes County is outside the 32 county Atlanta area for the additional VOC and NO_x control rules.

6. Class I Area Impacts

The facility is located within 100 kilometers of the Okefenokee National Wildlife Refuge and Wilderness Area which is a Class I area.

B. Site Determination

Southern Reman, Inc. (AFS No. 185-0094) and Langdale Forest Products Company (AFS No. 185-0009) are parts of the same Title V Site.

This Title V Permit will cover only the Southern Reman, Inc. part. Langdale Forest Products Company (AFS No. 185-0009) have applied for a separate Title V Permit under application No. TV-9334.

C. Existing Permits

None

D. Process Description

1. SIC Code(s) Major - 2421
Other - None

2. Description of Product(s)

The facility produces finished lumber.

3. Overall Facility Process Description

Southern Reman, Inc. (SRI) receives scraps and reject dried lumber from Langdale Forest Products and other saw mills and planer mills. At SRI, defects are cut out of the board to produce short and odd-dimension lumber. Each board is cut and moulded (planed) based upon the location and type of defect. Fugitive emissions from all cutting and moulding operations are captured by vacuum hoods with the aid of induced draft fans. Particulate matter from the saws and the moulder is removed from the air stream using mechanical cyclones (CY2 and CY3) located on top of the wood waste loading bin (LB1). Butts and ends are sent to a chipper. Particulate matter from the chipper air stream is removed using a mechanical cyclone (CY1) on top of loading bin LB1. SRI indicates in the permit application that 8,410 tons per year of scrap and reject wood is processed in the facility.

4. Overall Process Flow Diagram (optional)

None.

E. Regulatory Status

1. PSD/NSR

The facility is a minor source with regards to the New Source Review (NSR) Prevention of Significant Deterioration of Air quality (PSD) regulations.

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			✓
PM ₁₀	Yes			✓

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
SO ₂	N/a			
VOC	N/a			
NO _x	N/a			
CO	N/a			
TRS	N/a			
H ₂ S	N/a			
Individual HAP	N/a			
Total HAPs	N/a			

Note: The facility's potential to emit (PTE) particulate matter (PM) is only 35 tons per year (ton/yr). A PTE of this magnitude is clearly below the Title V major source threshold of 100 ton/yr. Therefore it would appear that this facility does not belong to the Title V major source classification. However, this facility is part of a Title V site and has opted for a separate permit. Therefore, according to the Title V rules, it must obtain a Title V Permit even though its PTE is below the Title V major source threshold.

3. MACT Standards

This facility is not subject to a MACT.

4. Program Applicability

Indicate if the following programs are applicable to the facility (with a "yes" or "no").

Program Code	Applicable (y/n)
Program Code 6 - PSD	n
Program Code 8 - Part 61 NESHAP	n
Program Code 9 - NSPS	n
Program Code M - Part 63 NESHAP	n
Program Code V - Title V	y

Regulatory Analysis

II. Facility Wide Requirements

- A. Emission and Operating Caps: None.
- B. Applicable Rules and Regulations
 - Rules and Regulations Assessment – Not applicable.
 - Emission and Operating Standards – Not applicable.
- C. Compliance Status – See Section VII.F.
- D. Operational Flexibility – See Section VII.A.
- E. Permit Conditions – None.

III. Regulated Equipment Requirements

- A. Brief Process Description
 - See Section I.D.
- B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
MD1	Moulder (Planer Mill)	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	CY2	Cyclone
	Plant Paved Roadways	GA Rule 391-3-1-.02(2)(n)	N/A	N/A

- C. Equipment & Rule Applicability
 - Moulder (Planer Mill) [MD1]

The planer mill is used to process the lumber. The planer mill is subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes". The following equation is used to calculate the allowable rate of emission for process input weight rate up to and including 30 tons per hour:

$$E = 4.1 P^{0.67}$$

For process input weight rate above 30 tons per hour, the following equation is used to calculate the allowable rate of emission:

$$E = 55P^{0.11} - 40$$

Where:

E = Emission rate in pounds per hour

P = Process input weight rate in tons per hour

The Permittee indicates in its supplemental letter of application that it is capable of processing up to 8,410 tons during 2,000 hours of operation per year. Therefore the tons per hour planned in the moulder is 4.2, resulting in a Rule (e) allowable PM emission rate of 10.73 pounds per hour (lb/hr) or 47.0 ton/yr assuming 8760 hours of operation. The company estimates the actual PM emission by assuming an emission rate of 2.0 lb/hr, obtained from the *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, SCC 3-07-008-08*. This is well below the Rule (e) allowable PM emission rate so compliance with Rule (e) is likely.

The planer mill is also subject to Georgia Rule 391-3-1-.02(2)(b) "Visible Emissions". Georgia Rule (b) limits visible emissions to 40 percent opacity and compliance with Rule (b) is likely.

Plant Roads

The roadways are subject to Georgia Rule 391-3-1-.02(2)(n) "Fugitive Dust" which applies to any operation, process, handling, transportation or storage facility which may result in fugitive dust. This applicable requirement limits the fugitive dust to under 20 percent opacity and requires the facility to take all reasonable precautions to prevent dust from becoming airborne from these roads.

Miscellaneous Equipment:

Sawmill

The sawmill cuts defects out of the lumber to produce short and odd-dimension lumber. The sawmill is subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes." The maximum throughput of the sawmill as stated above is 8,410 tons per year of lumber or 4.2 tons per hour, based on operations of 2,000 hr/yr. Maximum allowable emissions for the sawmill calculated under this rule, then, are 10.73 lb/hr or 47.0 ton/yr. The Permittee estimates the emission rate of the sawmill to be 4.0-lb/hr using the SCC emission factor as stated earlier. Under that assumption, the potential emissions of the sawmill would be 17.52 ton/yr PM. This emission factor shows adequate compliance with GA Rule (e). Since this piece of equipment emits less than 25 ton/yr of PM, it is listed in Attachment B of the permit, under generic emission groupings.

Cyclone CY1 is associated with the chipper and cyclone CY3 is associated with the sawmill. Because the PM emission rate from the sawmill and the chipper is each small, monitoring is not required for either of these cyclones.

- D. Compliance Status: See Section VII.F.
- E. Operational Flexibility: See Section VII.A.
- F. Permit Conditions

Condition 3.4.1 requires that the particulate matter emitted from the moulder does not exceed the Rule (e) allowable emission rate.

Condition 3.4.2 requires that visible emissions from the moulder comply with Rule (b).

Condition 3.4.3 requires that fugitive emissions from roads comply with Rule (n).

Condition 3.4.4 requires that fugitive dust generated be minimized by adopting reasonable precautions such as the application of water, etc.

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

- A. General Testing Requirements

None of the regulations applicable to the emission units and Equipment Groups specified in Part III require performance testing. The permit does specify in Condition No. 4.1.1 that a performance test may be required at anytime upon request by EPD to determine compliance with the emission limits contained in Parts II and III of this narrative. Condition 4.1.2 requires a thirty day written notice prior to any testing and the test methods for measuring emissions are listed in Condition 4.1.3.

- B. Specific Testing Requirements

There is no specific testing requirement.

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 also be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

The moulder (MD1) is subject to Georgia Rules 391-3-1-.02(2)(b) for Visible Emissions and (e) for Particulate Matter (PM). Shavings from the moulder are transferred to the shavings bin by a cyclone (CY2). Proper operation and maintenance of the cyclone will ensure that emissions are below the allowable limitations for PM and visible emissions. Weekly inspections of the cyclone are required to assure that proper operation and maintenance are taking place. Any adverse condition discovered by the inspection of the cyclone is required to be recorded as an excursion and reported.

Condition 5.3.1 requires the Permittee to maintain records of all data and information required by Condition No. 5.2.1.

VI. Other Record Keeping and Reporting Requirements**A. General Record Keeping and Reporting Requirements**

Section 6.1 of the Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and the prompt reporting of all information related to deviations from applicable requirements. The submission of written reports (semiannually) of any failure to meet an applicable emission and/or any failure to comply with or complete any work practice or standard contained in this permit is also required. Condition 6.1.7 requires the Permittee to report any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of monitoring.

B. Specific Record Keeping and Reporting Requirements

The Permittee is required to maintain all records describing the routine maintenance performed on all air pollution control equipment. The Permittee is also required to maintain records of all actions taken to suppress fugitive dust and help assure compliance with Rule(n).

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

Operational flexibility does not need to be incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V permit application.

B. Alternative Requirements

See VII.A above

C. Insignificant Activities

See Section 4.10 of the Title V application

D. Temporary Sources

The Permittee has not requested to operate any temporary sources

E. Short-Term Activities

See Section 4.40 of the Title V permit application. The Permittee did not report any short-term activities

F. Compliance Schedule/Progress Reports

None needed

G. Emissions Trading

None

H. Acid Rain Requirements

None applicable

I. Prevention of Accidental Releases

Southern Reman, Inc. is subject to the requirement of 40 CFR 68

J. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since Southern Reman, Inc. has at least some air conditioners, chillers and refrigerators, Subpart F is an applicable requirement.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V permit

L. Specific Conditions

None

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.

Draft Permit Review		
Reviewing Program	Comments Received (y/n)?	Comments Taken into Consideration in Draft Permit (y/n)?
ISMP		
SSCP		

SSPP Unit Manager: _____
//SSPP Unit Manager// Date

SSPP Program Manager: _____
//SSPP Program Manager// Date

Addendum to Narrative

There were no comments.