Facility Name: International Paper Company, Inc. - Augusta Lumber Mill
City: Augusta
County: Richmond County
AIRS #: 04-13-245-00047 Application #: TV- 9146

Date Application Received: October 22, 1996 (Updated April 30 and November 5, 1999)
Date Application Deemed Administratively Complete: March 12, 1997
Date of Draft Permit: December 23, 1999
Permit No: 2421-245-0047-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Joe Aisien	John Yntema
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ISMP	Deanna Garrison	Larry Webber
TOXICS	Art Stelson	Heather Abrams

Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to International Paper Company - Augusta Lumber Mill 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: International Paper Company, Inc. - Augusta Lumber Mill

2. Parent/Holding Company Name: International Paper Company, Inc.

3. Previous and/or Other Name(s): Federal Paper Board Company - Augusta Sawmill
Continental Route 56 Corporation
Continental Forest Industries, Inc.
Conwall Company

4. Facility Location: 4206 Mike Padgett Highway
Augusta, Georgia 30906

5. Attainment or Non-attainment Area Location

The facility is located in Richmond County, Georgia, which is in attainment for all criteria pollutants.

6. Class I Area Impacts

This facility is not located within 100 km of a Class I area.

B. Site Determination

The Title V site includes two plants owned by International Paper, a lumber mill and a paper mill, which are contiguous or adjacent and under common control. This Title V permit will cover only the lumber operation. International Paper has applied for a separate Title V permit for the paper mill under application No. TV-9161.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, there are no comments.

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2421-121-12053 Operation of a lumber processing mill, including two (2) Energy Systems Limited Model SGDF30 green sawdust burners for Kilns 1 and 3, and one (1) Kilntech Sloping grate gasifier and secondary burner for Kiln 2	September 3, 1996		X

D. Process Description

1. SIC Code(s): Major - 2421
   Other - none

2. Description of Product(s)

   This facility produces southern yellow pine dimensional lumber.

3. Overall Facility Process Description

   The facility receives raw pine logs which are debarked and then cut into appropriate dimensions in the sawmill. The green dimensioned lumber is dried in one of three direct-fired kilns from approximately 50 percent to between 15 and 20 percent moisture content using high temperature schedule drying. The dried lumber is planed and then sorted by length, size, and grade, and transported by truck or rail for delivery to the customer.

   Secondary products generated at this facility are wood chips, sawdust, bark, and shavings. The majority of the green sawdust is used as fuel for the wood-fired lumber kilns. The remainder of the green sawdust and the wood particles from the dried wood are transported to a particle board manufacturer.

4. Overall Process Flow Diagram

   See update to Title V application received on September 21, 1999.

E. Regulatory Status

1. PSD/NSR

   This facility has been in operation since 1969 and was first issued a state air quality permit on June 11, 1981. In 1995, the facility brought back into production rebuilt Kiln 1 (KD01). At that point, the potential to emit (pte) of the two existing kilns, Kilns 2 (KD02) and 3 (KD03), exceeded 250 tons per year VOCs (using a VOC emission factor of 3.8 pounds per thousand board feet of lumber processed). The potential VOC emissions from rebuilt KD01 was calculated to be 50 ton/yr if production was capped at 72,500 board feet of lumber processed per day which exceeds 40 ton/yr, thus making this a major modification. In order that the restart of Kiln 1 not be considered a major modification, the facility accepted a production limit of 131.5 million board feet of lumber per any 12 consecutive months for Kilns 2 (KD02) and 3 (KD03), which made the "existing source" minor for PSD, with pte of 249 ton/yr VOC.

   The facility is clearly now a major source under the Prevention of Significant Deterioration of air quality (PSD) New Source Review (NSR) regulations, with pte for VOC greater than 250 tons per year (ton/yr).

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	T		
PM_{10}	yes			T
SO_2	no			
VOC	yes	T		
NO_x	yes			T
CO	yes			T
TRS	no			
H_2S	no			
Individual HAP	yes	T		
Total HAPs	yes			T

3. MACT Standards

This facility is not subject to a current MACT standard, nor are they potentially subject to a scheduled future MACT standard.

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	no
Program Code 8 - Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M - Part 63 NESHAP	no
Program Code V - Title V	yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility is authorized to burn sawdust, which has been contaminated by a small amount of oil, in the kilns, if the sawdust is contaminated with the oil in one of three ways:

- Sawdust subject to the minute contamination of lubricating oil, which occurs during the operation of pieces of machinery such as sawmills and hoggers,

- Sawdust used to soak up accidental oil spills from containers and equipment on site, including hydraulic oil, lubricating oil and other nonhalogenated and nonhazardous petroleum based products, and

- Sawdust contaminated by oils for other reasons approved by the Director in writing.

The contaminants that the sawdust may contain (hydraulic oil, lubricating oils and other nonhalogenated and nonhazardous petroleum based products) are not hazardous waste according to the U.S. EPA and are essentially fuels. Therefore, the Division believes that occasional firing of such materials in a wood-fired boiler has little effect on the emissions of air pollutants and the emissions of any contaminants would be non-detectible, providing that the oil is not hazardous waste and that metal contaminants in the oil are negligible.

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

Condition 2.4.1 authorizes the facility to burn sawdust contaminated with small amounts of oil if generated in one of 3 ways listed.

III. Regulated Equipment Requirements

A. Brief Process Description

The facility receives raw pine logs which are debarked and then cut into appropriate dimensions in the sawmill. The green dimensioned lumber is dried in one of three direct-fired kilns from approximately 50 percent to between 15 and 20 percent moisture content using high temperature schedule drying. The dried lumber is planed and then sorted by length, size, and grade, and transported by truck or rail for delivery to the customer.

Secondary products generated at this facility are wood chips, sawdust, bark, and shavings. The majority of the green sawdust is used as fuel for the wood-fired lumber kilns. The remainder of the green sawdust and the wood particles from the dried wood are transported to a particle board manufacturer.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	ID No.	Description
KD01	Direct Fired Lumber Drying Kiln 1	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	NA	NA
KD02	Direct Fired Lumber Drying Kiln 2	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	NA	NA
KD03	Direct Fired Lumber Drying Kiln 3	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	NA	NA
PLO1	Planer Mill	GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(b)	CL02	cyclone
RF01	Unpaved Road Dust	GA Rule 391-3-1-.02(2)(n)	NA	NA
RF02	Paved Road Dust	GA Rule 391-3-1-.02(2)(n)	NA	NA

C. Equipment & Rule Applicability

KD01, KD02, and KD03:

This facility started operation in 1969. KD01 was installed in 1973 and the 17 MM BTU/HR burner was fired with oil/natural gas. In 1981, the permittee applied for a permit to construct and operate and also requested authorization to switch the fuel fired in the burner from oil/natural gas to wood waste. Permit to operate No. 2421-121-8032-0 was issued to the permittee on June 11, 1981. In 1985, the permittee replaced KD01's 17 MM BTU/HR burner with a 24 MM BTU/HR burner without obtaining a permit. In 1987, Kiln No. 2 (KD02) with a 24 MM BTU/HR burner was installed without permit. On May 14, 1991, the permittee applied for a permit to construct one kiln (KD03) with two (2) burners each with a 15 MM BTU/HR capacity. An amendment to

permit No. 2421-121-9119 was issued on June 4, 1992. This amendment reflected a total burner capacity of 30 MM BTU/HR for KD03 as stated in permittee's application of May 14, 1991. However instead, the permittee installed two (2) burners on KD03 each with a capacity of 30 MM BTU/HR for a total of 60 MM BTU/hr. In mid 1992, KD01 was shutdown. On August 25, 1995, facility requested authorization to install one additional kiln and utilize heat from the existing burners attached to KD03 that were permitted in 1992. An amendment to permit No. 2421-121-9119, granting authorization to install the new kiln (KD01), was issued on December 1, 1995. In June 1996, KD02 was completely reskinned and its dry shavings 24 MM BTU/HR burner was replaced with a 30 MM BTU/HR burner fired with green sawdust. This change was accommodated in permit No. 2421-121-12053 issued on September 3, 1996.

Each of the three drying kilns is used to dry dimensional lumber from approximately 50 percent moisture content to between 15 and 20 percent. As stated earlier, this facility is a major source for VOC with regards to NSR PSD Regulations. It became major after the addition of rebuilt KD01 in 1995. In order not to be subject to NSR PSD permitting requirements, the facility agreed to not process more than 131.5 MM board feet of lumber during any 12 consecutive months in kilns KD02 and KD03. This resulted in a VOC allowable emission rate of 249.85 tons per year, given the emission factor of 3.8 pounds per thousand board feet of lumber processed. Kiln KD01 has a maximum production rate of 94,000 board feet per day (but has no permitted limit). Given the emission factor of 3.8 pounds VOC per thousand board feet of lumber processed, the VOC emission rate from KD01 is 65.12 ton/yr. The VOC potential to emit for the facility is therefore 249.85+65.12 or 315 ton/yr.

As part of the Title V application, the permittee requested that we allow them to use an emission factor of 3.62 pounds per thousand board feet of lumber processed. Keeping the same 250 ton/yr VOC cap on the combined emissions of Kilns KD02 and KD03, this allowed them to also request that drying kilns KD02 and KD03 production be limited to 138,038,674 vis-a-vis 131,500,000 board feet of lumber during any 12 consecutive months. The EPD has advised the permittee that, because the 131,500,000 board feet of lumber processed during any period of 12 consecutive months was set for PSD avoidance purposes, an increase in that production limit to 138,038,674 board feet during any period of 12 consecutive months or any other increase would be acceptable only if the permittee agreed to a performance test to prove that emissions were as low as the 3.8 lbs VOC per MBF. The permittee subsequently agreed to keep the 131, 500,000 board feet of lumber limit for kilns KD02 and KD03 during any period of 12 consecutive months. Note: The emission factor of 3.62 pounds per thousand board feet of lumber processed which International Paper Company, Inc. attempted to use was calculated using emission data contained in a draft kiln database compiled by National Council of the Paper Industry for Air and Stream Improvement, Inc. (NCASI). To this date, AP-42 has not published a final emission factor for this process. If such an emission factor is ever established which is greater than 3.8 lbs VOC per MBF, we would need to lower the allowable production rate from KD02 and KD03. On the other hand, if a new emission factor is established which indicates lower emissions than 3.8 lbs VOC per MBF, we could raise allowable production rate at that time.

These kilns are subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes" based on the following equation:

$$E = 4.1P$$

where:

E = the allowable PM emission rate in pounds per hour
P = the total dry process weight input rate in ton per hour

The three drying kilns are also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(b). Georgia Rule (b) applies to all sources that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard. Georgia Rule (b) limits visible emissions to 40 percent opacity.

Cyclone CL01 delivers shavings from the trimmer and the wood hog as by-products for sale. Cyclones CL03 and CL04 deliver sawdust to the burners on the kilns. Cyclones CL01, CL03, and CL04 are considered to be process equipment or recovery devices. It appears that emissions from all three cyclones is subject to Rule(b), so opacity cannot exceed 40%.

PL01:

The planer mill prepares the surfaces of the lumber. This planer mill is subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(e) "Particulate Emission from Manufacturing Processes" based on the following equation:

$$E = 4.1P$$

where E = the allowable PM emission rate in pounds per hour
P = the total dry process weight input rate in ton per hour

The planer mill is also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(b). Georgia Rule (b) applies to all sources that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard. Georgia Rule (b) limits visible emissions to 40 percent opacity.

The maximum throughput of the planer mill is limited to the capacities of the kilns, approximately 165,567 MBF/yr. The weight of dry lumber, assuming a density of 40 lb/ft^3 for Southern Yellow Pine, a moisture loss of 35 percent, and 8372 hours of operation is :

$$\frac{\text{[illegible]}}{\text{[illegible]}} \left(\frac{\text{[illegible]}}{\text{[illegible]}}\right)\left(\left(\frac{\text{[illegible]}}{\text{[illegible]}}\right)\left(\frac{\text{[illegible]}}{\text{[illegible]}}\right)\left(\frac{\text{[illegible]}}{\text{[illegible]}}\right)\left(\frac{\text{[illegible]}}{\text{[illegible]}}\right)\left((1\&0.3\text{[illegible]}) = 2.4\frac{\text{[illegible]}}{\text{[illegible]}}\right).$$

Therefore, the maximum allowable emission rate, using the equation above given by GA Rule (e), is 31.95 lb/hr, or 140 ton/yr PM. This planer mill is controlled by a cyclone. The facility calculated maximum emissions from this process of 8.76 ton/yr PM, using a draft AP-42 PM emission factor for cyclones of 2 lb/hr.

RF01 and RF02:

The paved and unpaved roads are subject to Georgia Rule for Air Quality Control 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 20% opacity from the roads and requires the facility to take all reasonable precautions to prevent dust from becoming airborne from these roads.

Miscellaneous Equipment:

Sawmill

The sawmill (constructed in 1990) cuts logs into dimensional 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 includes the maximum throughput of the drying kilns, 165,567 MBF/yr, and a small percentage of the green lumber production that is sold. Assuming not more than 10% of the maximum kiln production represents the amount of green lumber that is not dried, the maximum sawmill production is 182,124 MBF/yr or, based on operations of 8372 hr/yr and 2.75 lb/BF, 30 ton/hr. Maximum allowable emissions for these sawmills calculated under this rule, then, are 40.0 lb/hr or 168 ton/yr. A draft Chapter 10.1 of AP-42, issued November 1993, gives an emission factor for the particulate emissions generated from the sawing of wood of 0.65 pound per thousand board feet. Under that assumption, the potential emissions of the sawmill would be 59.2 ton/yr PM. While this emission factor shows adequate compliance with GA Rule (e), previous experience with the processing of green or un-dried lumber indicates that particulate emissions from this process will be much less. This piece of equipment therefore is considered to emit less than 25 ton/yr of PM and are listed in Attachment B of the permit, as generic emission groupings.

Cyclones CL01, CL03, and CL04 are associated with the sawmill. However, these cyclones do not control emissions from the sawmill, nor is their operation necessary in order for the sawmill to comply with air quality rules. Their function is to facilitate collection of green sawdust and planer shavings, for later use as fuel in the kilns and as by-product, and so they are therefore considered process or recovery equipment.

D. Compliance Status: See Section VII.F

E. Operational Flexibility: See Section VII.A

F. Permit Conditions

Condition 3.2.1 limits the lumber dried in Kilns KD02 and KD03 to 131.5 MM BF during any period of twelve consecutive months. This condition is a carry-over from Condition No. 3 of Permit No. 2421-121-12053. This condition was necessary to avoid PSD review when KD01 was rebuilt and brought back into service in 1995. [PSD Avoidance; 391-3-1-.03(2)(c)]

Condition 3.4.1 limits the visible emissions from each of the direct fired drying kilns and the planer mill (Source Codes KD01, KD02, KD03, and PL01) to 40 percent opacity.

Condition 3.4.2 limits the PM emissions from each of the direct fired drying kiln (Source Codes KD01, KD02, and KD03) based on Georgia Rule (e).

Condition 3.4.3 limits PM emissions from the planer mill (Source Code PL01) based on Georgia Rule(e).

Condition 3.4.4 requires the facility to take all reasonable precautions to prevent fugitive dust from being airborne.

Condition 3.4.5 limits the visible emissions from the unpaved and paved roads (Source Codes RF01 and RF02) to 20 percent opacity.

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

General Testing Requirements:

This facility is not currently required to perform any emissions testing. However, a condition specifying that the Division can require emissions testing on any emissions unit is included. The test methods to be used to determine compliance with the limitations in Part 3 are listed and a general condition requiring notification of any test and submission of a test plan are also provided.

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

Specific Monitoring Requirements:

Direct Fired Lumber Drying Kilns 1, 2, and 3 (KD01, KD02, and KD03, respectively) are subject to Georgia Rules 391-3-1-.02(2)(b) for Visible Emissions and (e) for Particulate Matter. KD02 is equipped with a single burner fired with green sawdust. KD03 is equipped with two burners fired with green sawdust. KD01 is not equipped with a burner; however, it receives its heat from the burners attached to KD03. No controls are present on the kilns for Particulate Matter emissions. Based on available technical literature, the kilns emit less than 25 percent of the Rule (e) Particulate Matter allowable. A determination was made that PM emissions from the kilns are not likely to exceed the allowable limits under almost any operational scenario and, for this reason, no monitoring for Particulate Matter or visible emissions is required by the permit.

The Planer Mill (PL01) is subject to Georgia Rules 391-3-1-.02(2)(b) for Visible Emissions and (e) for Particulate Matter (PM). Shavings from the Planer Mill are transferred to the shavings bin by a cyclone (CL02). 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.

Record Keeping and Reporting Requirements:

Records, including identification of any excursions from 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. The permit specifies that these records will form the basis of the compliance certification to be submitted on an annual basis.

A requirement is included to maintain a record of all actions taken to suppress fugitive dust from paved or unpaved roads (Source Codes RF01 and RF02), storage piles, or any other source of fugitive dust to show compliance with Georgia Rule 391-3-1-.02(2)(n).

A requirement is also included to maintain records of the monthly production rates of the dried lumber necessary to confirm compliance with the production limit in Condition No. 3.2.1 [PSD Avoidance; 391-3-1-.03(2)(c)]

Another requirement included is to notify the Division when the total production of drying kilns KD02 and KD03 exceeds 10,950,000 board feet during any calendar month in order to help assure compliance with Condition 3.2.1 [PSD Avoidance; 391-3-1-.03(2)(c)]

VI. Other Record Keeping and Reporting Requirements

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 related information to deviations from applicable requirements.

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

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

- refer to §4.10 of the Title V permit application

Category	Description of Insignificant Activity/Unit	Quantity
Maintenance, Cleaning, and Housekeeping	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	5
Industrial Operations	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: i) Activity is performed indoors; & ii) No significant fugitive particulate emissions enter the environment; & iii) No visible emissions enter the outdoor atmosphere.	Various
Storage Tanks and Equipment	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	12
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	Various

D. Temporary Sources

International Paper Company - Augusta Lumber Mill has not requested to operate any temporary sources.

E. Short-Term Activities

International Paper Company - Augusta Lumber Mill did not report any short-term activities.

F. Compliance Schedule/Progress Reports

The facility indicates in their Title V application that it is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or process reports were necessary.

G. Emissions Trading

This facility is not involved in any emission trading programs.

H. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Prevention of Accidental Releases

International Paper Company - Augusta Lumber Mill is subject to the requirements 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 International Paper Company - Augusta Lumber Mill 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.

Closing Block: We have reviewed and recommend issuance of draft Permit No. 2421-245-0047-V-01-0

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager Date

Addendum to Narrative

International Paper Company, Inc. had two comments:

1. That the wording of the last sentence in Part 1.3 was more specific than necessary. It had read: “The remainder the green sawdust and the wood particles from the dried wood are transported to a particle board manufacturer”

Response

The sentence in Part 1.3 has been reworded as follows: “The remainder of the green sawdust and the wood particles from the dried wood are transported to various outlets”.

2. That the requirement for daily maintenance inspections of the planer mill cyclone in Condition 5.2.1, was excessive.

Response

The maintenance schedule in Condition 5.2.1 has been changed to once per week. Weekly inspections of cyclones have been determined to be adequate for the purposes of assuring that proper operation and maintenance are occurring.