

Facility Name: **Keadle Lumber Enterprises, Inc.**
 City: Thomaston
 County: Upson
 AIRS #: 04-13-293-00007

Application #: TV-16220
 Date Application Received: May 18, 2005
 Date Application Deemed
 Administratively Complete: July 17, 2005
 Date of Draft Permit:
 Permit No: 2421-293-0007-V-01-0

| Program | Review Engineers | Review Managers |
|----------------|-------------------------|------------------------|
| SSPP | Joe Gorski | Eric Cornwell |
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| SSCP | Davy Simanjaya | Douglas Waldron |
| Toxics | N/A | N/A |

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 in 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 Amendments of 1990. 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Keadle Lumber Enterprises, Inc. 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:

Keadle Lumber Enterprises, Inc.

2. Parent/Holding Company Name

Keadle Lumber Enterprises, Inc.

3. Previous and/or Other Name(s)

None known.

4. Facility Location

889 Railroad Street
Thomaston, GA 30286
Upson County

5. Attainment or Non-attainment Area Location

Keadle Lumber Enterprises is located in an area considered to be in attainment with all of the National Ambient Air Quality Standards (NAAQS).

6. Class I Area Impacts

Keadle Lumber Enterprises is not located within 200-km of a Class I area.

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 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, comments are listed in Table 2 below.

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 |
| 2421-145-11646 | July 10, 1995 | | ✓ |

| Permit Number and/or Purpose of Issuance | Date of Issuance and Date of Amendments (if any) | Comments | |
|--|--|----------|----|
| | | Yes | No |
| Amendment to 2421-145-11646 | March 6, 1997 | ✓ | |
| Amendment to 2421-145-11646 | May 28, 2003 | ✓ | |

Table 2: Comments on Specific Permits

| Permit Number | Comments |
|-----------------------------|---|
| Amendment to 2421-145-11646 | Amendment for the construction and operation of Boiler OB02 and establishment of limits on equipment operating hours. |
| Amendment to 2421-145-11646 | Amendment to increase the allowable operating hours of the Planer Mill, OPSM. |

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)

Keadle Lumber Enterprises, Inc. produces dimensional lumber and wood pallets out of pine and hardwoods.

3. Overall Facility Process Description

Pine Sawmill:

Pine logs are received from trucks and stored on a yard before being debarked and sent to the sawmill. The bark produced by the debarker is conveyed to the bark area, where it is passed over vibrating screens and separated by size. The sawmill consists of several sawing operations that cut the lumber into various sizes. Saw dust produced by these operations is conveyed to a truck bin and sold. Scraps produced by the various saws are chipped in three chippers. The chips generated are passed over shaker screens to separate the fines from the large chips. The chips are then conveyed to train cars for sale, and the fines are conveyed to the truck bin along with the sawdust. A cyclone, Cyclone OC06, is used to collect the chips from one of the chippers. The collected chips are passed over

vibrating screens, which separate the chips from the fines as described above. Cyclone OC07 exhausts to the atmosphere via stack OS07.

Hardwood Sawmill:

The hardwood sawmill is very similar to the pine sawmill, except that hardwood logs are received rather than pine logs. Within the sawmill, there is one chipper, which feeds a train car, and several sawing operations. The bark and sawdust generated are conveyed to a truck bin. None of the hardwood lumber is planed or dried, and there are no air emissions from the sawmill.

Pallet Mill:

Some of the lumber produced by the hardwood lumber mill is high grade (furniture grade), and the rest is pallet grade. The pallet grade lumber is sent to the pallet mill, where it is cut and either made into pallets or sold for the manufacture of pallets. Saw dust generated by the pallet mill is collected by a system of blowers that feed Cyclone OC01, which exhausts via stack OS01. The sawdust collected is then conveyed to Cyclone OC02, where it is collected for later sale. Cyclone OC02 exhausts via stack OS02.

Lumber Drying Kilns:

Cut lumber from the pine sawmill is sorted by length and thickness and then stacked. The stacks are then dried in one of two kilns. The kilns are heated by steam supplied by two wood waste boilers. Cyclone OC08 and Multiclone OC09 control particulate matter emissions from the boilers, which exhaust through stacks OS08 and OS09.

Planer Mill:

The dried lumber is then sent to the planer mill, where it is cut to more precise dimensions. The planer mill produces shavings, which are collected by Cyclone OC03. Cyclone OC03 exhausts through stack OS03. Trim blocks from the planer mill are hogged and collected by Cyclone OC04, which exhausts through stack OS04. A blower combines and carries the collected material from these two cyclones to one of two areas. Under normal conditions, the shavings are carried to the fuel house, where they are collected by Cyclone OC06 and stored for use as fuel for the boiler. Cyclone OC06 exhausts through stack OS06. When the fuel house is full, the shavings are diverted by a Y-valve to a truck bin for later sale. There, the shavings are collected by Cyclone OC05, which exhausts through stack OS05.

4. Overall Process Flow Diagram (optional)

A process flow diagram was attached with the application.

E. Regulatory Status

1. PSD/NSR

The facility is considered to be a minor source with respect to PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

Due to an increase in business, Keadle Lumber Enterprises has opted to remove the hourly limits on the various operations conducted at the facility and become a major Title V source for VOC, NO_x, and PM. The potential facility-wide emissions are illustrated in Table 3, below, and demonstrate that the facility will remain below 250 tons per year without the need to limit operations in any way. Detailed calculations are attached.

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? | | | Potential To Emit |
|------------------|---------------------------|--|-----------------------------------|-------------------------|--|
| | | Major Source Status | Major Source Requesting SM Status | Non-Major Source Status | Tons Per Year |
| PM | ✓ | ✓ | | | 191.6 |
| PM ₁₀ | ✓ | | | ✓ | PM ₁₀ emissions are included in the above PM emissions estimate |
| SO ₂ | ✓ | | | ✓ | 6.1 |
| VOC | ✓ | ✓ | | | 126.7 |
| NO _x | ✓ | ✓ | | | 119.1 |
| CO | ✓ | | | ✓ | 73.8 |
| TRS | No | | | | N/A |
| H ₂ S | No | | | | N/A |
| Individual HAP | ✓ | | | ✓ | Methanol 7.4 Formaldehyde 0.6 |
| Total HAPs | ✓ | | | ✓ | 8.0 |

3. MACT Standards

The facility is a minor source for hazardous air pollutants; therefore, no MACT standards apply.

4. Program Applicability

| Program Code | Applicable (y/n) |
|---------------------------------|------------------|
| Program Code 6 - PSD | No |
| Program Code 8 – Part 61 NESHAP | No |
| Program Code 9 - NSPS | Yes |

| Program Code | Applicable (y/n) |
|---------------------------------|---------------------|
| Program Code M – Part 63 NESHAP | No |
| Program Code V – Title V | Yes |

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

Keadle Lumber Enterprises, Inc. is operating under an NOV for exceeding the limits on hours of operation.

D. Operational Flexibility

Refer to Section VII.A.

E. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

Pine Sawmill:

Pine logs are received from trucks and stored on a yard before being debarked and sent to the sawmill. The sawmill consists of several sawing operations that cut the lumber into various sizes. Bark and saw dust produced by these operations is conveyed to a truck bin and sold.

Hardwood Sawmill:

The hardwood sawmill is very similar to the pine sawmill, except that hardwood logs are received rather than pine logs. Within the sawmill, there is one chipper, which feeds a train car, and several sawing operations. None of the hardwood lumber is planed or dried.

Pallet Mill:

Some of the lumber produced by the hardwood lumber mill is high grade (furniture grade), and the rest is pallet grade. The pallet grade lumber is sent to the pallet mill, where it is cut and either made into pallets or sold for the manufacture of pallets.

Lumber Drying Kilns:

Cut lumber from the pine sawmill is sorted by length and thickness and then stacked. The stacks are then dried in one of two kilns. The kilns are heated by steam supplied by two wood waste boilers.

Planer Mill:

The dried lumber is then sent to the planer mill, where it is cut to more precise dimensions. The planer mill produces shavings. Under normal conditions, the shavings are carried to the fuel house and stored for use as fuel for the boilers.

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 |
| OB01 | Wood waste boiler 1, 26.8 MMBtu/hr | 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) | 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.1, 5.2.3, 6.2.3, 6.2.4 | OC08 | Cyclone |
| OB02 | Wood waste boiler 2, 28.7 MMBtu/hr | 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60 Subpart Dc | 3.3.1, 3.4.3, 3.4.4, 3.4.5, 4.2.1, 5.2.2, 5.2.3, 5.2.4, 6.2.1, 6.2.4, 6.2.5 | OC09 | Multiclone |
| OPTM | Pallet Mill | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) | 3.4.1, 3.4.2, 5.2.1, 6.2.2, 6.2.3 | OC01 & OC02 | Cyclones |
| OPLM | Planer Mill | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) | 3.4.1, 3.4.2, 5.2.1, 6.2.2, 6.2.3 | OC03, OC04, OC05, & OC06 | Cyclones. |
| OPSM | Pine Sawmill | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(n) | 3.4.1, 3.4.2, 5.2.1, 6.2.2, 6.2.3 | OC07 | Cyclone. |
| OSK1 | Drying Kiln 1 | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2 | N/A | None. |
| OSK2 | Drying Kiln 2 | 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) | 3.4.1, 3.4.2 | N/A | None. |

C. Equipment & Rule Applicability

Emission and Operating Caps –

Due to an increase in business, Keadle Lumber Enterprises has opted to become a Title V major source with respect to VOC, NO_x, and PM. As a result the hourly operating limits imposed by Amendment to Permit No. 2421-145-11646 issued on March 6, 1997 are no longer necessary.

Applicable Rules and Regulations -

Boilers OB01 and OB02:

These boilers burn bark wood waste to provide steam to the kiln dryers and have a heat input capacity of less than 30-MMBtu/hr. Boilers OB01 and OB02 were installed in 1985 and 1996, respectively. A multiclone controls emissions from Boiler OB02 while Boiler OB01 is controlled by a cyclone. Since they were constructed after Jan 1, 1972, these boilers are subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(d) "Fuel Burning Equipment" based on the following equation: $E = 0.5(10/R)^{0.5}$, where "E" is the allowable PM emission rate in pounds per million Btu, and "R" is heat input rate in million Btu per hour for the boiler.

The boilers are also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(d)3. Georgia Rule (d)3 limits the opacity to 20 percent except for one six-minute period per hour of not more than 27 percent opacity.

These boilers are also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(g). This rule limits the fuel sulfur content to 2.5%. Wood is a low-sulfur fuel, so the likelihood of violation of Rule (g) is minimal. Using AP-42 emission factors, the typical sulfur content of wood is 0.005%.

Because of the size and the installation date, only Boiler OB02 is subject to the New Source Performance Standards (NSPS) found in 40 CFR 60, Subpart Dc. Subpart Dc requires fuel-usage record keeping. Because Boiler OB02 has a heat input capacity that is less than 30-MMBtu/hour, it is not subject to Subpart Dc PM limits nor Subpart Dc opacity limits. Boiler OB02 is also not subject to any Subpart Dc sulfur dioxide limit because it does not burn any fossil fuel.

Drying Kilns OSK1 and OSK2, Planer Mill OPLM, Pine Sawmill OPSM, and Pallet Mill OPTM:

The two drying kilns dry dimensional lumber from Pine Sawmill OPSM. Volatile organic compounds are emitted during the drying process. The Division has approved an emission factor of 3.8 lb. of VOC per MBF in order to calculate the emissions of VOCs from the drying of wood.

The Planer Mill, Pine Sawmill, Pallet Mill, and Drying Kilns are subject to the particulate matter limit found in Georgia Rule 391-3-1-.02(2)(e), "Particulate Emission from Manufacturing Processes." The limit must be calculated using the production rate and the following equation: $E = 4.1P^{0.67}$, where "E" is the allowable PM emission rate in pounds per hour and "P" is the total dry process weight input rate in tons per hour.

The Planer Mill, Pine Sawmill, Pallet Mill, and Drying Kilns are also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(b), "Visible Emissions." 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.

D. Compliance Status

Keadle Lumber Enterprises, Inc. is operating under an NOV for exceeding the limits on hours of operation.

E. Operational Flexibility

Refer to Section VII.A.

F. Permit Conditions

Condition 3.3.1 subjects Boiler OB02 to NSPS 40 CFR 60 Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units".

Condition 3.4.1 limits the PM emissions from the Planer Mill, Pine Sawmill, Pallet Mill, and Drying Kilns (Emission Unit ID Nos. OPLM, OPSM, OPTM, OSK1, and OSK2) based on Georgia Rule (e).

Condition 3.4.2 limits the visible emissions from the Planer Mill, Pine Sawmill, Pallet Mill, and Drying Kilns (Emission Unit ID Nos. OPLM, OPSM, OPTM, OSK1, and OSK2) based on Georgia Rule (b) to 40 percent opacity.

Condition 3.4.3 limits the PM emissions from the boilers (Emission Unit ID Nos. OB01 and OB02) based on Georgia Rule (d).

Condition 3.4.4 limits the sulfur fuel content to the boilers (Emission Unit ID Nos. OB01 and OB02) based on Georgia Rule (g).

Condition 3.4.5 limits the visible emissions from the boilers (Emission Unit ID Nos. OB01 and OB02) based on Georgia Rule (d) to 20 percent opacity.

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 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

As discussed in Section III.C Boilers 1 and 2 are subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(d) "Fuel Burning Equipment" based on the following equation: $E = 0.5(10/R)^{0.5}$, where "E" is the allowable PM emission rate in pounds per million Btu, and "R" is heat input rate in million Btu per hour for the boiler. The allowable PM emission rate and potential PM emissions for each boiler is presented below:

$$E_{\text{Boiler 1}} = 0.5(10/26.8)^{0.5} = 0.31 \text{ lb/MMBtu} \quad PTE_{\text{Boiler 1}} = (0.35 \text{ lb/MMBtu})(26.8 \text{ MMBtu/hr}) = 9.38 \text{ lb/hr}$$

$$E_{\text{Boiler 1}} = (0.31)(26.8) = 8.31 \text{ lb/hr}$$

$$E_{\text{Boiler 2}} = 0.5(10/28.7)^{0.5} = 0.30 \text{ lb/MMBtu} \quad PTE_{\text{Boiler 2}} = (0.35 \text{ lb/MMBtu})(28.7 \text{ MMBtu/hr}) = 10.0 \text{ lb/hr}$$

$$E_{\text{Boiler 2}} = (0.30)(28.7) = 8.61 \text{ lb/hr}$$

Based on the potential PM emissions shown above, the boilers will not be able to comply with the allowable PM emission rate specified in Georgia Rule (d). Previous testing has shown that the emission rate of Boilers 1 and 2 are within their respective allowable PM emission rate at 7.42 lb/hr and 7.34 lb/hr, respectively. However several factors can influence the outcome of the tests (i.e. temperature, heat input rate during testing, velocity pressure, etc.). As a result, Condition 4.2.1 requires the facility to conduct particulate matter performance testing on Boilers OB01 and OB02 within 120 days of permit issuance in order to determine compliance with the emission limit in Condition 3.4.1. This condition also requires additional testing on both of the boilers at regular intervals.

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

The Wood Waste Boilers (Emission Unit ID Nos. OB01 and OB02) are subject to Georgia Rule 391-3-1-.02(2)(d) for particulate matter and opacity. Particulate matter (PM) emissions from OB01 are controlled by a cyclone while PM emission from OB02 are controlled by a multiclone. Proper operation and maintenance of the PM control equipment will ensure that emissions are within allowable limits. To make certain multiclone OC09 is operating properly, pressure drop monitors must be monitored at least once per shift, any malfunctions must be corrected in an expedient manner, and any adverse condition(s) discovered are required to be reported, according to 6.1.7(c), as excursions. The facility must also check Cyclone OC08 and Multiclone OC09 for visible emissions at least once per day of operation. Any visible emissions exceeding a ten percent opacity action level must be corrected in an expedient manner, and any adverse condition(s) discovered are required to be reported, according to 6.1.7(c), as excursions.

Prior to the testing required by Condition 4.2.1, Condition 5.2.4 requires the facility to install and maintain pressure-monitoring devices on Multiclone OC09, which controls particulate matter emissions from Boiler OB02.

The Wood Waste Boilers (Emission Unit ID Nos. OB01 and OB02) are subject to Georgia Rule 391-3-1-.02(2)(g) "Sulfur Dioxide." As indicated in the "Regulated Equipment Requirements" section of this narrative, wood (the fuel) has a sulfur content much lower than the Rule(g) limit of 2.5%. Since the Permittee cannot violate Rule(g) when burning wood, there is no need to monitor the sulfur content of this fuel.

The Planer Mill, Pine Sawmill, and Pallet Mill (Emission Unit ID Nos. OPLM, OPSM, and OPTM) are subject to Georgia Rules 391-3-1-.02(b) and (e) for visible emissions and particulate matter (PM), respectively. Cyclones are used to control PM emissions from the mills and from Boiler OB01. The cyclones are subject to inspection monitoring and record keeping. To make certain that the cyclones are operating properly, weekly visual inspections must be conducted, any malfunctions must be corrected in a most expedient matter, and any adverse condition(s) discovered by the weekly inspections are required to be reported according to 6.1.7(c), as excursions.

The drying kilns (Emission Unit ID Nos. OSK1 and OSK2) are also subject to Georgia Rules 391-3-1-.02(b) and (e) for Visible Emissions and Particulate Matter (PM), respectively. These dryers use steam from the Wood Waste Boilers for drying the wood. There is no equipment for the control of PM emissions on the dryers. However, based on available technical literature, potential PM emissions are less than 40 percent of the allowable PM limitation. A determination was made that PM emissions from the dryers are not likely to exceed the allowable limits under almost any operating scenario and, for this reason, no monitoring is prescribed by the permit.

VI. Other 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 6.2.1 requires the facility to demonstrate that Boiler OB02 complies with 40 CFR 60 Subpart Dc by retaining operational records that include the type and quantity of wood waste or other fuel burned in Boiler OB02.

Condition 6.2.2 requires the facility to maintain a record of all actions used to limit the fugitive dust from any source.

Condition 6.2.3 requires the facility to maintain a log indicating the date and time of the cyclone inspections along with any malfunctions discovered.

Condition 6.2.4 requires the facility to maintain a log indicating the date and time of the visible emissions inspections on Cyclone OC08 and Multiclone OC09.

Condition 6.2.5 requires the facility to record the pressure readings at Multiclone OC09.

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

The facility did not include any alternative operating scenarios in their Title V permit application. However, this Title V permit allows operational flexibility that is generally afforded most sawmills. For example, the facility has the flexibility to use various kinds of wood waste as fuel for the boilers; different species of wood may be dried in the kilns; and the kilns may dry lumber with various dimensions.

B. Alternative Requirements

The facility has not indicated a need for any new alternative requirements under Rule 391-3-1-.03(10)(d)8 in order to combine multiple overlapping of state and federal requirements.

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

Any applicable short term activities can be found on Form D.5, "Short-Term Activities", of the Title V permit application.

F. Compliance Schedule/Progress Reports

Keadle Lumber Enterprises, Inc. is operating under an NOV for exceeding the limits on hours of operation.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

Not applicable.

I. Prevention of Accidental Releases

Not applicable.

J. Stratospheric Ozone Protection Requirements

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

K. Pollution Prevention

None applicable.

L. 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 November 30, 2005 and ended on December 30, 2005. Comments were not received by the Division.