

TITLE V APPLICATION REVIEW

Facility Name: **Warrenton Chip-N-Saw**

City: Warrenton

County: Warren

AIRS #: 04-13-301-00003

Application #: TV- 9077

Date Application Received: October 26, 1996

Date Application Deemed

Administratively Complete: November 09, 1998

Date of Draft Permit: October 06, 1999

Permit No: 2421-301-0003-V-01-0

Program	Review Engineers	Review Managers
SSPP/ASU	Gabriel Kotsis	John Yntema
SSCP/ASU	Doug Waldron	Lou Musgrove
ISMP	Daniel Abrams	Larry Webber
TOXICS	NA	NA

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 Warrenton Chip-N-Saw 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: Warrenton Chip-N-Saw
2. Parent/Holding Company Name: Georgia Pacific Corporation
3. Previous and/or Other Name(s): None
4. Facility Location: 779 Thomson Highway, Warrenton, GA 30828
5. Attainment or Non-attainment Area Location:

The facility is located in an attainment area.

6. Class I Area Impacts

The facility is not located within 100 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: 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
2421-149-5787-0	Issued on November 5, 1981 Amended on January 30, 1995		X
2421-149-6912-0	Issued on May 29, 1979 Amended on August 21, 1997		X

D. Process Description

1. SIC Code(s)

Major - 2421
Other -

2. Description of Product(s)

This facility produces southern yellow pine dimensional lumber.

3. Overall Facility Process Description

Log Preparation:

Southern yellow pine logs of tree length are received by trucks. The logs are stored on log pads. The logs are sawn to desired length, debarked and scanned for metal.

Bark is conveyed to a fuel house for the boiler.

The pieces of the log which are not utilized for lumber are chipped and sold to paper mills.

Sawmill:

Sawmills cut the logs into dimensional lumber. The sawmill equipment includes one set of twin bandsaws, a chipping edger and a trimmer.

Trim blocks and edger strips are chipped and sold to paper mills.

Lumber Drying Kilns:

The lumber is dried in three kilns.

Planer Mill:

The dried lumber is planed in the planer mill, sorted by length, size and grade, and transported by truck or rail for delivery to the customer.

General:

By-products produced at the facility are wood chips, sawdust, bark, and shavings. Wood chips are transported to a paper mill. Bark is the primary boiler fuel. Shavings are sold offsite. Sawdust is used as supplemental fuel to fire the boiler and excess is sold offsite.

4. Overall Process Flow Diagram

Process flow diagrams are included in the application file.

E. Regulatory Status

1. PSD/NSR

The facility is a non-major source under PSD/NSR regulations. The boiler is grandfathered in, constructed in 1973.

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	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

This facility is not subject to a current 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 has no facility-wide emissions or operating caps.

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B. Applicable Rules and Regulations

- Rules and Regulations Assessment -Georgia Rule for Air Quality Control 391-3-1-.02(2)(n), "Fugitive Dust" (referred to as "Georgia Rule (n)") is an applicable requirement. This applicable requirement limits the fugitive dust to 20% opacity from the log storage piles, log debarking and bucking, fuel house and unpaved roads. This is cited as a facility-wide condition because it may apply to a variety of fugitive emission points at the plant, too numerous to list in Section III of this permit narrative and in Part 3.1 of their Title V permit.
- Emission and Operating Standards -Not applicable.

C. Compliance Status

The facility is in compliance. See Section VII.F.

D. Operational Flexibility

See Section VII.A.

E. Permit Conditions

Fugitive dust emissions are limited at the facility to not exceed 20 percent opacity.

III. Regulated Equipment Requirements

A. Brief Process Description

This facility produces southern yellow pine dimensional lumber. It receives tree long logs that are debarked and processed through the sawmills. Saw dust and bark are by-products.

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
400	Wood Waste Fired Boiler	GA Rule 391-3-1-.02(2)(d)	3.4.1, 3.4.2, 5.2.1, 5.2.2, 5.2.3, 5.2.5	BC1	Multiclone
				BESP	Electrostatic Precipitator
201	Drying Kiln No. 1	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.3, 3.4.4	None	None
202	Drying Kiln No. 2	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.3, 3.4.4	None	None
203	Drying Kiln No. 3	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.3, 3.4.4	None	None

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
300	Planer Mill	GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e)	3.4.3, 3.4.5, 5.2.4, 5.2.5	PMC1	Shavings Cyclone
				PMC2	Shavings Cyclone

* Generally Applicable Requirements contained in this permit may apply also to emission units listed above.

C. Equipment & Rule Applicability

Unit 400:

This wood waste fired boiler provides steam to the dry kilns. This boiler was erected in 1973 with maximum heat input capacity of 85.7 million Btu per hour. The Unit 400 is subject to the particulate matter limit outlined in Georgia Rule 391-3-1-.02(2)(d) "Fuel Burning Equipment" based on the following equation:

$$E=0.5\left(\frac{10}{R}\right)^{0.7}$$

where: E = the allowable PM or fly ash emission weight in pounds per million Btu heat input,
R = heat input rate in million Btu per hour for the boiler (Source Code 400)

This boiler is also subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(d)3 because it was constructed after January 1, 1972. 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.

Unit 201, 202, and 203:

The three drying kilns dry dimensional lumber from approximately 50 percent moisture content to 19 percent moisture content. The annual throughput for the kilns is 115,600 MBF/yr. The emission factor for VOCs used for the calculations is 3.8 lbs VOC per MBF. This emission factor is acceptable by the Division and gives 219.6 tpy VOCs, not a major for PSD with VOC emissions less than 250 tpy.

AP-42 has not published a final emission factor for this process. If at a later time, such an emission factor is established which is greater than 3.8 lbs VOC per MBF, the facility may be subject to PSD, or maybe required to limit production below 115,600 MBF/year.

These 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 = the allowable PM emission rate in pounds per hour
P = the total dry process weight input rate in tons 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.

Unit 300:

The planer mill levels and smooths the lumber surface. This planer mill is 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 = 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 particulate emissions at this planer mill are controlled by two cyclones.

D. Compliance Status

The facility has added an Electrostatic Precipitator in 1997 to control particulates from the boiler.

E. Operational Flexibility

The facility did not request any operational flexibility.

F. Permit Conditions

Condition 3.4.1 limits the PM emissions from the boiler (Source Code 400) based on Georgia Rule (d).

Condition 3.4.2 limits the visible emissions from the boiler (Source Code 400) to 20 percent opacity.

Condition 3.4.3 limits the visible emissions from the dry kilns and the planer mill (Source Codes 201, 202, 203, and 300) each to 40 percent opacity.

Condition 3.4.4 limits the PM emissions from the drying kilns (Source Codes 201, 202, and 203) based on Georgia Rule (e).

Condition 3.4.5 limits the PM emissions from the planer mill (Source Code 300) based on Georgia Rule (e).

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

General Testing Requirements:

None of the applicable regulations require performance testing, therefore testing was not required for any of the emissions units. However, the permit does contain a condition providing that the Division can require that a performance test be conducted to determine compliance with the emissions limits contained in Condition 3.4.

Test methods for determining emissions rates are listed in Condition 4.1.3.

Specific Testing Requirements:

If the Permittee chooses to operate the Woodwaste-fired Boiler (Source Code 400) in conjunction with operating Electrostatic Precipitator (BESP) with only one of the two fields energized, the Permittee shall conduct a performance test for particulate matter emissions to determine compliance with the emissions limitation contained in Condition 3.4.1.

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

General Monitoring Requirements

The general monitoring requirements have been included.

Specific Monitoring Requirements:

The Wood Waste Fired Boiler (Emission Unit 400) is subject to Georgia Rules 391-3-1-.02(2)(d) for visible emissions and particulate matter. The boiler utilizes multiclones (Air Pollution Control Device I.D. Nos. BC1) and an electrostatic precipitator (Source I.D. No. BESP), all in series, to control particulate matter emissions. BESP is the primary control device and the multiclones are for the purpose of reinjecting fly ash to improve boiler efficiency but also serve to control PM emissions. PM emissions tests have indicated that the emissions are low and less than 20 percent of the allowable limit. Efficient operation of the ESP will ensure that the PM and visible emissions are low. The ESP operating parameters that are related to collection efficiency (i.e., efficient collection of PM) are secondary voltage (kilovolts) of the transformer-rectifier and the current. Devices to measure these ESP parameters are required and the kilovolts and current are required to be recorded on an hourly basis. Minimum kilovolts and maximum current derived from ESP data taken during some typical days of operation and from the initial performance test of the ESP, are specified in the permit for the purpose of reporting excursions. Additionally, a weekly inspection of the multiclones is required to ensure proper operation and maintenance. The monitoring of ESP parameters and the weekly multiclone inspections will assure that emissions are low and not likely to exceed the applicable limitations.

Drying Kilns 1, 2, and 3 (Emission Units 201, 202, and 203) are subject to Georgia Rules 391-3-1-.02(2)(b) and (e) for visible emissions and particulate matter. The kilns are indirect-fired and include no control devices. Based on AP-42 emission factors and other available data, potential particulate matter emissions from these sources under a worst-case scenario are less than twenty percent of the respective Rule (e) limitations. Based upon this analysis, the likelihood of the Rule (b) and (e) allowable limitations being exceeded is low; therefore, no monitoring is required for these sources.

The Planer Mill (Emission Unit 300) is subject to Georgia Rules 391-3-1-.02(2)(b) and (e) for visible (opacity) and particulate matter emissions. A cyclone controls the particulate matter. Proper operation and maintenance of the cyclone will assure that emissions are less than applicable limitations. To ensure proper operation and maintenance, weekly inspections of the cyclone and baghouse are required. Records of the inspections are required to be kept by the Permittee in a form suitable for submittal or inspection by the Division. These inspections will assure that emissions are low and not likely to exceed allowable limitations.

Record Keeping and Reporting Requirements:

Records, including identification of any deviations 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.

VI. Other Record Keeping and Reporting Requirements

General Record Keeping and Reporting Requirements

The Permit contains 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 applicable requirements.

Specific Record Keeping and Reporting Requirements

None Applicable.

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

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	1
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators operating as follows: i) less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. ii) less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste. iii) less than 4 million BTU/hr heat input firing type 4 waste.	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning: i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators; ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year. iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year. iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	8
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	3

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: <ul style="list-style-type: none"> i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts. ii) Porcelain enameling furnaces or porcelain enameling drying ovens. iii) Kilns for firing ceramic ware. iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds. v) Bakery ovens and confection cookers. 	2
	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: <ul style="list-style-type: none"> i) Activity is performed indoors; & ii) No significant fugitive particulate emissions enter the environment; & iii) No visible emissions enter the outdoor atmosphere. 	17
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Industrial Operations (continued)	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	5
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	1
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	30
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

D. Temporary Sources

- There was no request to operate any temporary sources.

E. Short-Term Activities

- The facility did not report any short-term activities.

F. Compliance Schedule/Progress Reports

- The facility is in compliance with all Air Quality Regulations.

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

- The facility is subject to the requirements of 40 CFR 68.

J. Stratospheric Ozone Protection Requirements

- The standard permit conditions 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. The facility 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.

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Closing Block: We have reviewed and recommend issuance of draft Permit No. 2421-301-0003-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

On December 16, 1999, we received comments from the company which are outlined below, along with the Division response:

1. The company commented that there was a minor discrepancy in the process description in Condition 1.3. The final Title V permit reflects this.
2. The Company requested that, in the first sentence of Condition 5.1.1, the words "*as specified in Section 5.2*" be added after the word *recorded*. Condition 5.1.1 is a generic condition that is in the Title V template and therefore is in every Title V for which periodic monitoring, using monitoring systems or devices, is specified. Section 5.2 specifies frequency of data recording. The Division believes that conditions in section 5.2 determine the data recording frequency; therefore, no change needs to be made to the wording of Condition 5.1.1.
3. The company claimed that there is no relationship between spark rate of the ESP and the particulate emission rate. The company stated that the spark rate monitor can read 0 (zero) and the ESP can still be operating in compliance. The company requested that Conditions 5.2.1b, 5.2.5c.ii and 5.2.5c.iv of the draft Title V permit not be included in the final permit.

Additionally, the company requested that the trigger value for secondary voltage excursion be substantially reduced for ESP operation with two cells energized and also proposed a trigger value for operation of the ESP with only one cell energized, which was based on theoretical inlet ESP loading and the Deutsch-Anderson equation. The company submitted a copy of a letter from the ESP manufacturer in which monitoring of secondary current was recommended. However, the company letter did not offer to monitor secondary current (milliamps) in lieu of monitoring spark rate

Based upon information submitted in the December 16, 1999 letter and information received from other parties, the Division agrees that spark rate is not an indicator of proper operation of the ESP. However the Division does not agree with the company's proposal to monitor ESP secondary voltage only since that is not adequate periodic monitoring for TV purposes. Additionally, setting parameter values for excursions based upon theoretical inlet ESP loading and the Deutsch-Anderson equation is inferior to setting parameter values through other available means. Specifically, the Division believes that both secondary voltage and current should be monitored and excursion trigger values for these parameters should be based upon ESP data collected during Particulate Matter (PM) emissions tests.

A PM emissions testing was conducted on the boiler during September, 1997 with both ESP cells energized. The boiler was operating at 85 percent of design load and the results showed the boiler to be well in compliance with PM limitations. ESP data had been recorded during this testing and the Division performed an evaluation of that data to determine if revision of the secondary voltage trigger values, as requested by the company, was appropriate. Based upon this evaluation, and because requirements are being added for monitoring secondary current, it was determined that the secondary voltage threshold for excursions could be lowered. Conditions 5.2.1 b and 5.2.5 c were revised to reflect this.

Additionally, PM emissions testing on the boiler was conducted November 17, 1999 with only No. 1 Cell energized and also with only No. 2 Cell energized. The test results showed the boiler to be in compliance with the PM allowable limit with No. 1 Cell only and the boiler at a reduced steam load; however, the test

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results for No. 2 Cell only indicated PM emissions greater than the allowable limitation. Based upon these results, the Division recommends that, if the facility needs to operate only one of the cells for periods of time, emissions testing must be done to establish compliance thresholds for ESP values, while operating the No. 1 cell alone and the No. 2 cell alone. The Division does not believe that compliance thresholds for No. 1 Cell only can be established because of the lower steam load during testing (approximately 70% of maximum load).

4. The company requested that the permit to do not require the hopper of the boiler multiclone be checked for bridging and plugging. Also, the company asserts that "*adverse conditions discovered during an inspection such as a plugged conveyor does not mean the ESP will be out of compliance or that there is an excursion*" and requests that only records should be required similar to the records requirement in Condition 5.2.4 (planer mill cyclone). The company requests that Condition 5.2.3 and 5.2.5.c.v be changed to reflect that.

There is a fundamental difference between the boiler multiclone and the general planer mill cyclone. The boiler multiclone operates as a control device while the general planer mill cyclone operates as both a control device and product recovery equipment. The planer mill is subject to Georgia Rule (e) and the allowable PM emissions limitation is relatively high because of the process input weight rate. Because of the applicable PM limitation, the Division believes that records of the weekly inspections of the planer mill cyclone, without any reporting of the inspection results, is adequate for assuring that the cyclone is being properly maintained for controlling emissions below the allowable limit. Additionally, in a letter (to Daniel Abrams from Margarete M. Vest dated January 5, 2000), the company indicated that the reason test results showed PM emissions above the allowable limit, with only No. 2 Cell, was "*due to the old multiclone in front of the ESP*" and stated that a new multiclone is to be installed. The Division considers this to be a clear indication that malfunction or physical deterioration of the boiler multiclone could adversely affect the emissions rate and that it is reasonable to require the reporting of any adverse condition discovered by the weekly inspections. The condition 5.2.3 was revised to eliminate the check of the boiler cyclone hopper as indicated under recommendations. However, the Division firmly believes that any adverse condition for the boiler multiclone should be reported as an excursion; therefore no change was made to Condition 5.2.5c.v.

5. The company requested that we change the last sentence of 5.3.1.e from "...When the monitoring system or device has not been inoperative..." to say "...When the monitoring system or device has been inoperative..."

The last sentence Condition 5.3.1.e has been misinterpreted by the company. The last sentence means that when a monitoring system or device has not been inoperative, not been repaired, or not been adjusted during the reporting period, the quarterly/semiannual report should contain a statement to that effect. No change was made to the condition.

6. The company requested that we change Condition 6.1.2 and 6.1.3, as they feel that these conditions are unclear as written. The company requested that condition 6.1.2 be clarified to read 7 "business days." The company an explanation of how the report required by condition 6.1.3 is different from that required by condition 5.3.1.

Condition 6.1.2 is derived (in part) from Georgia Air Quality Control Rule 391-3-1-.02(6)(b)1.(iv). This rule requires reporting of certain instances with "7 days" and not "7 business days." Therefore reports required by condition 6.1.2 are required within 7 calendar days and thus the condition has not been changed.

Condition 5.3.1 requires a report on "excess emissions", "exceedences", and/or "excursions." The specifics of what constitutes an excess emission, an exceedence, and an excursion are contained in condition 5.2.3.

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Reports required by condition 6.1.3 would cover deviations (i.e. failure to meet an applicable emission limit or standard or failure to comply with or complete a work practice standard or requirement) that are not covered under condition 5.3.1 and 6.1.2.

7. The company requested that we add “Not applicable” under condition 7.7. The phrase was added.
8. The company requested that we change the Conditions 8.11.1.a, 8.19, 8.21.1, and 8.22, as they feel that these conditions are unclear as written.

These conditions are template conditions approved by EPA, so as those, no changes were made.