

PERMIT AMENDMENT NO. 2493-003-0013-V-05-1

ISSUANCE DATE: 03/05/2018



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Langboard - Willacoochee
Facility Address: 548 Langboard Road
Willacoochee, Georgia 31650, Atkinson County
Mailing Address: 548 Langboard Road
Willacoochee, Georgia 31650
Parent/Holding Company: Langdale Industries
Facility AIRS Number: 04-13- 003-00013

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The addition of a Finger-Jointing Line Operation (Emission Unit ID No. T004) and a third Painting Line to the existing TLC Painting and Finishing Operations (Emission Unit ID No. T002).

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **2493-003-0013-V-05-0**. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **47682** dated **July 28, 2017**; any other applications upon which this Amendment or Permit No. **2493-003-0013-V-05-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.



[Signed]

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

The modification involves changes to the TLC Moulding operations. The proposed modification includes (1) the addition of a new finger jointing line operation (Emission Unit ID No. T004) resulting in the emission of PM that will be controlled by a new air pollution control device (APCD No. TC03), a baghouse; and (2) the addition of a new paint line to the existing two paint lines (Emission Unit ID No. T002) that will be controlled by the existing baghouse (APCD No. TC02).

The finger jointing line operation will be a mechanical process that cuts a set of complimentary rectangular cuts into wood to be later interlocked and assembled.

The raw material for the TLC Mouldings operations is principally MDF panels. The panels are first processed through the Sawing and Moulding Lines (Emission Unit ID No. T001). After the cutting and routing operations are complete, the mouldings produced can be transferred to the Paintings and Finishing Operations, or be shipped out unfinished. Currently, there are two painting lines in place. Paint Line 1 consists of initial sanding, primer coating, drying, secondary sanding, secondary coating, drying, buffing, and packaging. Paint Line 2 consists of sanding, coating, drying, buffing, and packaging. The new paint line, Paint Line 3, will also consist of sanding, coating, drying, buffing, and packaging.

Title V Permit Amendment

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Additional Emission Units

Table : Modified Emission Unit Description					
Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
T001	TLC Sawing and Moulding Lines	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	3.2.17, 3.3.5, 3.4.1, 3.4.3, 4.2.2, 5.2.2, 5.2.7, 5.2.8, 6.1.7, 6.2.2, 6.2.6 through 6.2.8	TC01	Baghouse
T002	TLC Painting and Finishing Operations	40 CFR 63, Subpart A 40 CFR 63, Subpart QQQQ 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	3.2.17, 3.2.18, 3.3.14, 3.3.15, 3.3.16, 3.4.1, 3.4.3, 4.2.2, 5.2.2, 5.2.7, 5.2.8, 6.1.7, 6.2.2, 6.2.5 through 6.2.8, 6.2.19 through 6.2.25	TC02	Baghouse
T004	Finger-Jointing Line	40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	3.2.17, 3.3.5, 3.4.1, 3.4.3, 4.2.2, 5.2.2, 5.2.7, 5.2.8, 6.1.7, 6.2.2, 6.2.6 through 6.2.8	TC03	Baghouse

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

[Modified Condition]

3.2.17 The Permittee shall not discharge, or cause the discharge into the atmosphere, from the baghouses that control the TLC sawing and moulding lines with Emission Unit ID No. T001, the TLC painting and finishing operations with Emission Unit ID No. T002, and the finger-jointing line operations with Emission Unit ID No. T004, PM emissions in excess of the following limits during any 12-month consecutive period as determined in accordance with the equation in Condition 6.2.8:

[PSD Avoidance - 40 CFR Part 52.21]

- a. 4.00 tons from the baghouse with ID No. TC01.
- b. 4.00 tons from the baghouse with ID No. TC02.
- c. 4.00 tons from the baghouse with ID No. TC03

3.3 Equipment Federal Rule Standards

[Modified Condition]

- 3.3.5 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63, in Subpart A – “General Provisions,” and Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” for the operation of the flash tube dryers with ID Nos. EU05, EU06, and EU07, the press vent system with ID No. EU22, the fluidized bed energy system with ID No. EU24, the TLC sawing and moulding lines with ID No. T001, and the finger-jointing line with ID No. T004.
[40 CFR 63 Subparts A and DDDD]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

[Modified Condition]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.
[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

[Modified Condition]

- 4.2.2 The Permittee shall conduct performance tests for PM emissions from the baghouses with Emission Unit ID Nos. TC01 through TC03 at least once every 48 months to establish short-term PM emission rates from TC01 through TC03 to assure compliance with the emission limits specified in Condition 3.2.17. Tests shall be conducted under conditions (process rates and routing configurations) that will yield baghouse inlet loadings equivalent to those likely under normal operating conditions. During the performance tests, the Permittee shall record the process rate for each piece of equipment generating PM collected in TC01 through TC03, as applicable.
[PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3), and 391-3-1-.02(6)(b)1]

[New Condition]

- 4.2.7 Within 180 days after the startup of the baghouse with Emission Unit ID No. TC03, the Permittee shall conduct performance tests for PM to establish short-term PM emission rate from TC03 to assure compliance with the emission limit specified in Condition 3.2.17.c. Tests shall be conducted under conditions (process rates and routing configurations) that will yield baghouse inlet loadings equivalent to those likely under normal operating conditions. During the performance tests, the Permittee shall record the process rate for the finger-jointing line (Emission Unit ID No. T004) generating PM collected in TC03.
[PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3), and 391-3-1-.02(6)(b)1]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**

5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1]

[a. through i. – No changes]

- j. A differential pressure indicator, on each of the bag filters with ID Nos. C001, C003, C008 through C016, C018 through C021, C026, and TC01 through TC03, to continuously measure and record the pressure drop across each of the bag filters. The differential pressure indicator must be certified by the manufacturer to be accurate within 5 percent of water column gauge pressure at the level of operation.

[k. and l. – No changes]

[Modified Condition]

5.2.7 The Permittee shall use a Preventive Maintenance Program for the bag filters with ID Nos. C001, C003, C008 through C016, C018 through C021, C026, and TC01 through TC03 to assure that the provisions of Condition 8.17.1 are met. The program shall be subject to review and modification by the Division and shall include the pressure drop ranges that indicate proper operation for each bag filter. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:

[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1]

- a. Record the pressure drop across each bag filter and ensure that it is within the appropriate range.
- b. For bag filters equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.
- c. For bag filters equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

[Modified Condition]

5.2.8 The Permittee shall perform a check to determine if visible emissions are present from the bag filters with ID Nos. C001, C003, C008 through C021, C026, and TC01 through TC03. The checks shall be conducted at least once for each day or portion of each day of operation of the emission units controlled by the bag filters are operated. The Permittee shall retain a record in a visible emissions (VE) log suitable for inspection or submittal. The checks shall be conducted using the following procedure:
[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1]

- a. The person performing the determination shall stand at a distance of at least 15 feet, which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one exhaust point shall be in the line of sight at any time when multiple emission points are in proximity to each other.
- b. For each source that exhibits visible emissions, the Permittee shall determine the cause and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. and b. – No changes]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

[i. through xii. – No changes]

[Modified Condition]

- xiii. Any visible emissions from any of the bag filters with ID Nos. C001, C003, C008 through C021, C026, and TC01 through TC03, which occurs for two consecutive determinations, required by Condition 5.2.8.

[xiv. through xvii. – No changes]

6.2 Specific Record Keeping and Reporting Requirements

[Modified Condition]

6.2.6 The Permittee shall maintain daily records of the hours of operation of the TLC sawing and moulding lines with ID No. T001, the TLC painting and finishing operations with ID No. T002, and the finger-jointing line operations with ID No. T004.
 [PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]

[Modified Condition]

6.2.7 The Permittee shall use the records required by Condition 6.2.6, and the results of the most recent Division-approved performance tests, to calculate and record the monthly PM emissions from each baghouse with ID Nos. TC01 through TC03 for each calendar month, using the following equation:
 [PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]

$$E = EF \times H \times 1.15$$

Where:

- E = PM emissions from a baghouse (TC01 or TC02, or TC03), in pounds per month
- EF= the average short-term PM emissions from a baghouse (TC01 or TC02, or TC03 as established during the most recent performance test, in pounds per hour (which shall be the average of the emission rate during that test, unless otherwise specified by the Division)
- H = the total hours of operation of the TLC sawing and moulding lines with ID No. T001 or the total hours of operation of the TLC painting and finishing operations with ID No. T002, or the total hours of operation of the finger-jointing line operations with ID No. T004, determined in accordance with Condition 6.2.6, during each calendar month
- 1.15= the uncertainty factor

[Modified Condition]

6.2.8 The Permittee shall use the monthly PM emission rates, calculated as per Condition 6.2.7, to calculate the rolling 12-month total PM emissions from each baghouse with ID Nos. TC01 through TC03 for each calendar month. The Permittee shall notify the Division, in writing, if PM emissions from Baghouse TC01 or TC02 or TC03 exceed 667 lb during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the facility intends to maintain compliance with the emission limitations specified in Condition 3.2.17.
 [PSD Avoidance - 40 CFR Part 52.21, 40 CFR 70.6(a)(3)(i), and 391-3-1-.02(6)(b)1.]