

## Air Permit Review

Permit Issue Date: **date, 2011**

**Region:** Raleigh Regional Office  
**County:** Granville  
**NC Facility ID:** 3900065  
**Inspector's Name:** Steven Carr  
**Date of Last Inspection:** 04/29/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Georgia-Pacific - Creedmoor Chip-N-Saw Plant</p> <p><b>Facility Address:</b>                  Georgia-Pacific - Creedmoor Chip-N-Saw Plant                  2128 Horner Waldorf Drive                  Creedmoor, NC 27522</p> <p><b>SIC:</b> 2421 / Sawmills &amp; Planing Mills General  <b>NAICS:</b> 321113 / Sawmills</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>			<p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 3900065.10A  <b>Date Received:</b> 09/30/2010  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 04048/T15  <b>Existing Permit Issue Date:</b> 02/02/2007  <b>Existing Permit Expiration Date:</b> 06/30/2011</p>
Mike O'Brien Regional Environmental Manager - Lumber (864) 465-2026 1664 South Main Street Ext. <a href="mailto:McCormick, SC 29835">McCormick, SC 29835</a>	Harvey Barfield, Jr. Plant Manager II (910) 642-5081 1980 Georgia-Pacific Road Chadburn, NC 28431	Melissa Antoine Senior Environmental Engineer (404) 652-2822 133 Peachtree Street NE Atlanta, GA 30303	
<b>Review Engineer:</b> Mark Cuilla		<b>Comments / Recommendations:</b>	
<b>Review Engineer's Signature:</b>		<p><b>Issue</b> 04048/T16  <b>Permit Issue Date:</b> <b>date, 2011</b>  <b>Permit Expiration Date:</b> <b>date, 2016</b></p>	
<b>Date:</b> <b>date, 2011</b>			

### I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**04048T15**) was issued on **February 2, 2007**, with an expiration date of **June 30, 2011**. The renewal application was received on **October 4, 2010**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

As part of this permit renewal, the Permittee has requested the removal of one woodwaste direct-fired lumber kiln (ID No. ESLK8). He notes that although the kiln has been removed from the facility, its wood residue burner remains at the facility and could be operated in the future as needed.

### II. Facility Description

The facility is a lumber mill that produces dimensional southern yellow pine lumber. The facility operates log processing (debarking, planing, cutting, etc) as well as drying operations with one woodwaste direct-fired lumber kiln.

### III. History/Background/Application Chronology

**July 20, 2006** – Permit **04048T14** issued as a Title V renewal.

**February 2, 2007** – Permit **04048T15** issued as an ownership change.

**October 4, 2010** – Permit application **3900065.10A** received as a Title V permit renewal application. The application was deemed complete for processing.

**April 29, 2010** – Annual compliance inspection completed by Steven Carr of the RRO.

**January 12, 2011** – DRAFT permit sent to Permittee and RRO for comment prior to public notice and EPA review. [The Permittee submitted comments on the draft permit via email on February 2, 2011. Those comments were reviewed and changes made to the permit as appropriate.](#)

**date, 2011** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Pages	Section	Description of Changes
Attachment	Insignificant Activities	-added sources to list per permit renewal application (Form D4)
Cover	-	-amended all dates and permit revision numbers -modified facility mailing address
TOC	-	-removed references to Part II
All	Header	-amended permit revision number
3	Equipment table	-removed reference to kiln (ID No. ESLK8) per Permittee -added MACT Subpart designation
4	2.1 A 2.1 A (table) 2.1 A.1.a 2.1 A.1.b	-removed references to kiln (ID No. ESLK8) throughout Section -brought former Section 2.1 A.4 into table for kilns subject to MACT Subpart DDDD -modified ID numbers -corrected testing rule cross reference
5	2.1 A.1.c 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.3.a 2.1 A.3.b 2.1 A.3.c	-modified ID numbers -modified ID numbers -corrected testing rule cross reference -modified ID numbers -modified ID numbers -corrected testing rule cross reference -modified ID numbers
6	2.1 B.1.b 2.1 B.1.c 2.1 B.1.d 2.1 B.1.e	-added ID numbers and updated shell language per Permittee's comments on draft permit -updated shell language -updated shell language -updated shell language

Pages	Section	Description of Changes
7	2.1 B.2.a 2.1 B.2.b 2.1 B.2.c  2.1 B.2.e	-added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language per Permittee's comments on draft permit -updated shell language
8	2.2 A (Table) 2.2 A.1 2.2 A.2	-clarified emission limits -corrected rule citation -updated shell language
9	2.2 A.3	-modified shell language for Last MACT/NC Air Toxics demonstrations
10-19	General Conditions	-updated shell conditions (v3.3)
20	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell

Other than end-dating one lumber drying kiln (**ID No. ESLK8**) and adding additional insignificant sources per the permit renewal application (Form D4), there were only minor, non-significant modifications to the equipment descriptions needed in ESM.

## V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants  
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .1100, Control of Toxic Air Pollutants  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart DDDD)  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2Q .0705, Existing Facilities and SIC Calls  
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document.

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility's one remaining lumber drying kiln (**ID No. ESLK9**) is subject to National Emission Standards for Hazardous Air Pollutants from Plywood and Composite Wood Products Manufacturing (40 CFR 63, Subpart DDDD). However, the kiln is subject in name only to this Subpart with the only requirements being initial notifications. These notifications have been completed and the facility is in compliance with the Subpart. This permit renewal does not affect this status.

**PSD** – The Permittee is not subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

**112(r)** – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store one or more of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. CAM applicability for the facility's control devices was established during the previous Title V renewal process (See Rahul Thaker's **July 20, 2006** permit review for permit **04048T14**). At that time CAM was determined not to apply to the facility's control devices. There have been no permit modifications that would have added/removed any new CAM requirements as part of this permit renewal. Therefore, CAM continues not to apply.

## **VII. Facility Wide Air Toxics**

The facility is currently subject to modeled emission rates for formaldehyde and phenol as well as made a demonstration that emissions of acetaldehyde do not exceed its TPER limits. The permit renewal does not affect this status.

The permit also includes the shell conditions requiring the Permittee to complete the Last MACT/NC Air Toxics compliance demonstration per 15A NCAC 2Q .0705. This language has been modified to require this submittal within 180 days of restart of the facility.

## **VIII. Facility Emissions Review**

There is no change in emissions for this renewal. There have been no reported emissions of criteria pollutants or HAPs/TAPs in the past two years.

## **IX. Stipulation Review**

The facility was last inspected by Steven Carr of the RRO on **April 29, 2010**. Based on his observations the facility appeared to be in a state of compliance with their Title V permit requirements by virtue of a complete plant shutdown.

## **X. Public Notice/EPA and Affected State(s) Review**

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States/areas within 50 miles of this facility.

## **XI. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

RRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with RRO's recommendation to issue the renewed air permit.