

**Air Permit Review**

**Permit Issue Date:**

**Region:** Raleigh Regional Office  
**County:** Person  
**NC Facility ID:** 7300052  
**Inspector's Name:** Steve Hall  
**Date of Last Inspection:** 07/14/2004  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Georgia - Pacific Roxboro  <b>Facility Address:</b> Georgia - Pacific Roxboro 1000 North Park Drive Roxboro, NC 27573  <b>SIC:</b> 2439 / Structural Wood Members, Nec <b>NAICS:</b> 321213 / Engineered Wood Member (except Truss) Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> n/a <b>NSPS:</b> n/a <b>NESHAP:</b> n/a <b>PSD:</b> n/a <b>PSD Avoidance:</b> n/a <b>NC Toxics:</b> n/a <b>112(r):</b> n/a <b>Other:</b> 15A NCAC 2D .0521		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 7300052.05A <b>Date Received:</b> 04/11/2005 <b>Application Type:</b> Modification <b>Application Schedule:</b> TV-Significant <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 07668/T11 <b>Existing Permit Issue Date:</b> 02/12/2004 <b>Existing Permit Expiration Date:</b> 11/30/2008		
Gary Bittner Environmental Coordinator (336) 599-1000 1000 North Park Drive Roxboro NC, 27573	Ralph Cook Plant Manager (336) 599-1000 1000 North Park Drive Roxboro NC, 27573	Cliff Bowling Sr Environmental Engineer (434) 283-6211 P O Box 340 Brookneal VA, 24528			
<b>Review Engineer:</b> Judy Lee  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____		<b>Comments / Recommendations:</b> <b>Issue:</b> 07668/T12 <b>Permit Issue Date:</b> <b>Permit Expiration Date:</b> November 30, 2008			

**1. Purpose of Application:**

At the Roxboro facility, Georgia-Pacific manufactures veneer building materials for use in home and building construction. The facility has approximately 260 employees and operates 24 hours per day, 7 days per week, 52 weeks per year with the exception of maintenance downtime. The plant produces a variety of laminated veneer lumber (LVL) products. The veneer production processes consist of debarking and end cut off operations, log conditioning operations which heat and add necessary moisture to logs prior to processing, a rotary lathe operation to produce the veneer sheets, and veneer drying and grading operations. Once the veneer panels are produced, they are routed to one of three LVL production lines where a phenol/formaldehyde-based resin is applied and the veneer sheets are stacked on top of one another to achieve the appropriate board thickness. The layered veneer sheets are then heated and pressed for a sufficient amount of time for the resin to bond. After exiting the press, the LVL product is routed to one of several finishing areas where it either undergoes some final cutting and packaging or it is used to produce I-beams in another part of the plant. [taken from the last Inspection Report on file for this facility dated July 14, 2005 performed by Mr. Steve Hall, RRO]

Georgia Pacific Roxboro LVL Plant was issued their initial Title V Operating Permit, Permit Number **07668T11**, on December 31, 2003 and it became effective on February 15, 2004. This permit modification is a request for reduced monitoring activities associated with the visible emissions observation requirement pursuant to Specific Condition 2.1-A.3.c. of the above referenced permit. This permit modification request will be processed as a significant modification following the procedures in 15A NCAC 2Q .0516(d). This application is for a significant modification that will not contravene or conflict with the existing permit and will be processed following the procedure set out in Rule 2Q .0501(c)(1).

The following table represents the changes to the current Title V permit as proposed to complete this permit modification:

Page Number	Condition Number	Change
All	Entire Permit	Converted from Word Perfect to MS Word
All	Entire Permit, where applicable	Changed reference to "Air Quality Title V Operation Permit" to "Air Quality Federal Title V and State Operation Permit" and "Air Quality Construction and Operation Permit" to "Air Quality State Operation Permit"
Attachment		Added Table of Changes and moved Insignificant Activities to front as an attachment
Cover	Permit Information	Modified to reflect current permit number, issue and effective date, and associated application information
7	Part I, Section 2.1-A.3.c.	Replaced daily visible emissions observations requirement with weekly observation requirements per condition placed in Permit Number 07668T11.
22	Part I, Section 2.1-I.	Added storage tank (ID No. ST5) per inspection report dated 7/14/2004
25 through 26	Part I, Section 3	Updated General Conditions

## 2. Application Chronology

The application chronology is detailed on the attached IMPAQ Comprehensive Application Report and attached email correspondence.

## 3. New Equipment/Change in Emission and Regulatory Review

This significant modification has no equipment modifications or change in emissions; therefore, applicable regulations will not change. This permit application involves modification of the existing visible emissions observation requirement pursuant to Specific Condition 2.1-A.3.c. The facility requests the monitoring frequency be reduced to weekly as allowed by the permit after a year of daily visible emission observations with no violation of 15A NCAC 2C .0521.

- Specific Condition 2.1-A.3.c. of Permit Number 07668T11 will be modified from visible emission observations once a day, as follows:

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. *To assure compliance, once a day the Permittee shall observe the emission points of this source for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If the emission sources is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily observation. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source*

are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 A.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521. **After one calendar year of daily observation without any violation of 15A NCAC 2D .0521, the Permittee may make a request to the DAQ to modify the permit to reduce the boiler visual emissions monitoring frequency to once a week upon providing supporting documentation for the monitoring reduction.**

- to weekly observations with the following permit language placed in the modified permit (Permit Number 07668T12):

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. *To assure compliance, once a week the Permittee shall observe the emission points of this source for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee shall either:*
  - i. *take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or*
  - ii. *demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 A.3. a. above.**If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.*

#### **4. NSPS, NESHAPS, PSD, 112r, CAM**

**NSPS**

New Source Performance Standards (NSPS) **do not** apply.

**NESHAPS**

National Emission Standards for Hazardous Air Pollutants (NESHAPS) **do not** apply.

**Attainment Status**

Person County is in attainment for all pollutants.

**PSD**

The facility has a major source threshold of 250 ton/year.

The facility's current Prevention of Significant Deterioration (PSD) status is minor. This permit revision will not change the facility's PSD status. No increase in emissions is experienced as a result of this permit revision.

**112r**

This facility is not subject to Section 112(r) of the Clean Air Act requirements, because it does not store any of the regulated substances in quantities above the threshold quantities listed in the rule.

**CAM**

The analysis on applicability to any CAM requirement is not required at this time. The application being processed is considered a significant modification; however, the modification does not require a control device to comply with the visible emissions standard.

#### **5. Facility Wide Air Toxic Air Pollutants:**

North Carolina's air toxics regulations are not applicable to this permit revision.

## 6. Facility Compliance Status

Georgia-Pacific has not been issued a Notice of Violation (NOV) in the last five years, nor have they been assessed any civil penalties.

Based on observations made by Mr. Hall, RRO, during the July 14, 2004 inspection, Georgia-Pacific appeared to be in compliance with the requirements of their Title V permit. It is recommended that the facility be reinspected in one year.

## 7. Stipulation Review

Based on Mr. Hall's last inspection report, the following changes need to be made to the permit:

*I. Six resin storage tanks (ID Nos. ST1, ST2, ST3, ST6, ST7, and ST8) and one wax storage tank (ID No. ST4).*

All seven storage tanks were observed with no visible emissions. Tank ST4 is currently empty. There is also another 6,186 gallon resin storage tank (ID No. ST5) on site. Tank ST5 is currently empty but should be added to the permit in case it is needed in the future.

The seventh storage tank was added to the permit during this permit modification.

## 8. Public Notice / EPA and Affected State Review

Pursuant to 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 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.

***Public Notice of the DRAFT Title V Permit was published in the XXXX. The public comment period ran from XX/XX/2005 to XX/XX/2005.***

Comments Received on the Draft Permit – No public comments have been received to date.

***EPA's 45 Day Review period ran concurrent with the 30 day Public Notice from XX/XX/2005 to XX/XX/2005.***

The following Significant EPA Comments regarding the Draft Permit were received -

## 9. Conclusions, Comments, and Recommendations

### PE Seal

Pursuant to 2Q .0112, this application did not require a PE seal because the permit revision does not involve the determination of applicability and appropriateness or performance of air pollution capture and control systems [15A NCAC 2Q .0112(b)(2) and (3)].

### Zoning

The requirement to be accompanied by a zoning consistency determination does not apply to this application because it is not a "new facility or an expansion of an existing facility" as specified in 2Q 0304.

*Fee Class*

Based on potential to emit, this facility has been classified as **Title V Major**. The facility's current IMPAQ status is **Title V Major**. This modification **will not** change the fee classification.

A draft permit and review were emailed to Mr. McEachern on June 20, 2005 for review and comments received on June 23, 2005.

The RRO recommends issuance of the permit per Mr. Charles McEachern's comments dated June 23, 2005. All of Mr. McEachern's recommendations were taken into consideration in this review.

A draft permit was emailed to Mr. Cliff Bowling, Georgia-Pacific, on June 20, 2005 for review and comments received on June 23, 2005.

RCO concurs with RRO's recommendation to issue air permit No. **07668T12**.