

July 23, 2020

Mr. Jaricus Whitlock, P.E.
Air II Branch Manager
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261

Dear Mr. Whitlock:

Subject: PSD Construction Permit Application

Vicksburg Forest Products LLC, Waltersville Lumber Mill

Air Facility No. 2780-00004

Al No. 1536

Vicksburg, Warren County, Mississippi

Vicksburg Forest Products, LLC is submitting the attached application request to construct two continuous dual path steam heated kilns (DPKs) and add a small log sawmill line at the facility. Steam will be supplied to the new DPKs with the existing boiler and no additional steam capacity is being added.

The projected emissions increase for the project has been evaluated and it has been determined that the increase in VOC emissions will exceed the PSD significant emission rates. A PSD review for VOC only has been documented in the application. The facility is also requesting limits on  $PM/PM_{10}/PM_{2.5}$  to remain below the PSD significant emission rate.

Your consideration in this matter is greatly appreciated. If you have any questions or comments, please contact Mr. Chris Barnett at 601-429-6443 or Mr. Bruce Ferguson of FC&E Engineering at 601-824-1860.

Regards,

William J Van Devender, Jr.

**Assistant Manager** 

Vicksburg Forest Products, LLC

Enclosure(s): 3-copies of PSD Air Construction Permit Application

Electronic Copy on USB Drive

Secretary of State Letter of Good Standing



# This is not an official certificate of good standing.

Name History

Name Type

Vicksburg Forest Products, LLC Legal

**Business Information** 

**Business Type:** Limited Liability Company

**Business ID:** 1141421

Status:Good StandingEffective Date:03/12/2018State of Incorporation:Mississippi

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# Application for a Prevention of Significant Deterioration (PSD) Air Construction Permit

# Vicksburg Forest Products

1725 North Washington Street Vicksburg, Mississippi



July 17, 2020

# Prepared by:

FC&E Engineering, LLC 917 Marquette Road Brandon, MS 39042 (601) 824-1860



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#### 1.0 Introduction

# 1.1 Purpose

Vicksburg Forest Products is proposing to install two steam-heated dual path kilns (DPKs). The existing boiler will be used to supply the steam to the new DPKs. The DPKs will have a nominal maximum capacity of 82.06 MMBF/yr each. This nominal maximum capacity was used in the analysis, although at the targeted product mix, the kilns will have a capacity of approximately 76 MMBF/yr each.

In addition to the installation of DPKs, the facility is proposing to install a small log sawmill. The modification will include a tandem ring debarker in the stem/log merchandiser which will feed to the existing headrig operation and the new small log sawmill. The existing debarker will be retained for oversized logs. The planer shavings pneumatic transfer system will be modified to remove the baghouse and cyclone which currently transfer to the boiler fuel silo. A new cyclone will be installed to transfer the planer shavings to a truck bin prior to shipment off-site for use by others. The facility will no longer retain the ability to produce hardwood products and will remove the end coating and lumber dip stations. Proposed changes are summarized in the following table:

EP No.	Description	Added	Removed	Modified
DPK-1	Steam heated dual path kiln	Х		
DPK-2	Steam heated dual path kiln	Х		
AA-001	Pneumatic wood residual handling system serving the planer mill			Χ
AA-002	94.8 MMBtu/hr wood-fired boiler			X <sup>1</sup>
AA-006	Sawmill operations			Х
AA-009	Lumber chemical treatment station		Χ	
AA-010	Miscellaneous coating operations		Χ	
AA-100	Facility wide			Χ

The facility haul roads (AA-007) and truck loadout operations (AA-013) were determined to be affected by the proposed changes. These affected units were included in the permitting analysis. The existing batch kilns (AK-001 through AK-028) are unaffected by the proposed changes.

#### 1.2 Technical Conclusions

The following is a summary of the technical and regulatory conclusions that constitute this permit application:

 The facility is currently an area source for Hazardous Air Pollutants and will become a major source after the modification. The facility will become subject to the Major Source Boiler MACT (40 CFR Part 63 Subpart DDDDD) and the PCWP MACT (40 CFR Part 63 Subpart DDDD) and will no longer be subject to the Area Source Boiler MACT (40 CFR Part 63 Subpart JJJJJJ).

<sup>&</sup>lt;sup>1</sup> There is no physical modification of the boiler. The facility is requesting a revision to the PM emission limits

- The facility is currently a PSD major source and PSD review is required for emissions increases
  exceeding the PSD significant emission rates. PSD review will be required for volatile organic
  compounds (VOC). The facility is requesting PSD avoidance limits on the boiler to avoid PSD
  review for PM/PM<sub>10</sub>/PM<sub>2.5</sub>.
- Compliance with the Major Source Boiler MACT may require additional controls for PM which would result in future emissions decreases for PM/PM<sub>10</sub>/PM<sub>2.5</sub>. Compliance with the Major Source Boiler MACT is not required until 3 years after becoming a major source, which is outside of the netting contemporaneous period and would not qualify for netting purposes.
- The HAP major source avoidance limit on facility wide emissions (AA-100) will need to be removed from the permit.

### 1.3 Permit Request

Vicksburg Forest Products LLC currently operates under Title V Permit No. 2780-00004, which was issued May 11, 2020, and expires April 30, 2025. The facility is requesting a permit to construct under MS Title 11, Part 2, Chapter 2 and Chapter 5..

The following is included in this application for permit Review:

- Mississippi Consolidated Air Application (Appendix A)
- Emissions Calculations (Appendix B)
- Emission Factor Reference (Appendix C)
- Baseline Emissions Reference (Appendix D)
- RBLC Report (Appendix E)

# 1.4 Permitting History

The Vicksburg Forest Products— Waltersville Lumber Mill was acquired from the Anderson Tully Lumber Company in 2018. The Anderson Tully Lumber Company manufactured hardwood products. After the acquisition, Vicksburg Forest Products requested a change in the method of operation for the mill to utilize the existing batch kilns and produce softwood products while retaining the capability to produce hardwood products. With the change in operation to produce softwood, the facility requested a production limit on the batch kilns of 115 MMBF/yr of softwood to remain a minor source of HAPs. Additionally, the modification avoided PSD review due to the limit in production. This change was made under the construction permit issued October 3, 2018.

The changes were incorporated into the Title V permit No. 2780-00004 and the permit was simultaneously renewed on May 11, 2020. The Title V operating permit expires April 30, 2025.

# 2.0 Site and Project Description

The Vicksburg Forest Products facility is in Warren County within the city limits of Vicksburg, MS. The facility falls under the Standard Industrial Classification (SIC) codes of 2421 for general sawmills and planing mills. The facility currently falls under 2426 for hardwood dimension and flooring mills, and 2491 for wood preserving, however, the facility does not have plans to process hardwood and emission units associated with hardwood production are being removed. The location of the air emission sources at the facility on an aerial photograph and the location of the facility on a topographic map are illustrated in Figure 1 and Figure 2.

Figure 3 depicts a block flow diagram for the lumber manufacturing process.

#### 2.1 Sawmill and Planer Mill

Lumber production starts with the logs being sent to the de-barker to remove bark and then to the cut-off saws to be cut to length. From the cut-off saws, logs enter the sawmill and are cut into green dimensional lumber. The sawmill operates a bark hog and two chippers. Hogged bark and sawdust are mechanically conveyed to the boiler fuel storage silos or the truck loadout area. Chips are conveyed to the truck loadout area. The green lumber is then sorted, stacked, and directed to lumber storage. From the kilns, the lumber is transferred to the planer mill where it is planed, graded, packaged, and placed in storage for loading and shipment by truck.

The facility is proposing to add a small log line to the sawmill. A tandem ring debarker will be installed in the stem/log merchandiser line that will feed both the small log sawmill and the existing headrig. Emissions associated with the small log line will be fugitive in nature and can be included with the existing sawmill (AA-006).

The wood residual transfer system (AA-001) handling the residuals generated at the planer mill will be modified. Planer shavings will no longer be transferred to the boiler fuel silos. The existing cyclone and baghouse will be removed and a new cyclone will be installed to pneumatically transfer the shavings to a truck bin for off-site shipment.

#### 2.2 Lumber Treatment Station

Based on customer specifications, currently hardwood may be dipped in a fungicide, insecticide, and antistaining solution (AA-009). After the dipping solution has dried, the lumber may be placed on the lumber yard, in one of sixty blow boxes, or in one of the dry kilns. The facility is proposing to remove the processing of hardwood from the permit and the lumber treatment station will be decommissioned. Vicksburg Forest Products has not processed hardwood since acquiring the mill and no longer has plans to process hardwood in the future.

#### 2.3 Dry Kilns

The facility maintains twenty-eight (28) batch dry kilns (AK-001 through AK-028) to reduce the moisture content in the lumber based on customer specifications. The facility is proposing the installation of two steam-heated dual path dry kilns (DPKs). Steam for both the batch kilns and new proposed DPKs will be

supplied by the existing boiler (AA-002). The DPKs will be more efficient than the existing batch kilns and steam demand for the DPKs will be steady state, reducing cycling of the boiler to meet steam demands. The combined maximum capacities of the DPKs is 164 MMBF/yr.

# 2.4 Miscellaneous Coatings

Hardwood may be, currently, end coated based on the customer needs. As mentioned previously the ability to process hardwood is being requested to be dropped from the permit. Pine lumber is not end coated; however, the dimensioned and dried pine lumber may contain logo painting and grade stamping.

#### 2.5 Boiler Area

The mill utilizes one existing boiler fired by wood residuals (AA-002). The existing boiler is used to produce steam to heat the existing batch dry kilns indirectly and is equipped with a multi-clone. The boiler is permitted to combust wood fuel. During maintenance periods the current operating permit allows for the use of up to two portable boilers while the facility boiler is being serviced. These portable boilers may be fueled by either natural gas or fuel oil.

By-products produced at the mill include bark, sawdust, chips, planer shavings, and dry trim. Except for the wood chips, all these residuals can be transferred to the boiler fuel silos. After the proposed project is complete, the planer shavings will be transferred to a truck loading bin prior to off-site shipment. The proposed modified transfer system will not accommodate transfer of the planer shavings to the fuel silo and planer shavings will no longer be used as boiler fuel.

No physical modifications are being made to the boiler, however, a limit of PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions is being requested with this application. With the addition of the DPKs, the boiler will operate under more steady state conditions. The steam demand for DPKs is consistent because product is being fed through the kilns on a continuous basis and energy is transferred to the lumber entering the kiln.

# 3.0 PSD Applicability Analysis

Major stationary source means any of the 28 source categories which emits or has the potential to emit 100 tons or more of any regulated NSR pollutant, any stationary source which emits 250 tons per year or more of a regulated NSR pollutant or any physical change that would occur at a stationary source not otherwise qualifying as a major stationary source, if the changes would constitute a major stationary source by itself. The Vicksburg Forest Products facility is not one of the 28 source categories and the potential to emit for the facility is greater than 250 tpy of VOC and PM. The facility qualifies as a major source regarding the PSD regulations.

Major modification means any physical change in or change in the method of operation of a major stationary source that would result in: a significant emissions increase of a regulated NSR pollutant; and a significant net emissions increase of that pollutant from the major stationary source. The project is not a major modification if it does not cause a significant emissions increase. If the project causes a significant emissions increase, then the project is a major modification only if it also results in a significant net emissions increase.

# 3.1 Significant Emissions Increase

The procedure for calculating (before beginning actual construction) whether a significant emissions increase (i.e., the first step of the process) will occur depends upon the type of emissions units being modified; projects that only involve existing emissions units, projects that only involve construction of a new emissions unit(s) or projects that involve multiple types of emissions units (hybrid).

The hybrid test [40 CFR 52.21(a)(iv)(f)] applies for this application because the proposed project includes both new and existing units. Under the hybrid test, a significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the emissions increases for each emissions unit, using the actual to projected actual or actual to potential method as applicable with respect to each emissions unit, unit equals or exceeds the significant amount for that pollutant.

The proposed DPKs, planer mill cyclone, tandem ring-debarker and small log sawmill will be new units subject to the actual to potential test. The emissions increase in the actual to potential test is the potential to emit from the new emissions unit following completion of the project.

The existing sawmill, boiler, roads, and fugitive residual handling sources are affected sources in the emissions increase determination. The affected units are existing units subject to the actual to projected actual test. The emissions increase for the actual to projected actual test is the difference between the projected actual emissions and the baseline actual emissions.

Historically, in the first step of the applicability process, only project increases are considered. The EPA Memo of March 13, 2018, however, interprets that decreases are allowed as "project accounting" in the first step. The baghouse (AA-001), the Lumber Treatment Station (AA-009), and the edge sealing or end coating of hardwood lumber included in the Miscellaneous Coating (AA-010) will be discontinued. Shut down of these units and the existing debarker would qualify as "project accounting" in the EPA Memo.

The facility will become subject to the boiler MACT with this proposed change and compliance will require a decrease in the PM emissions at the boiler (AA-002) which will result in a decrease in total PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions. Compliance is not required with the boiler MACT until 3 years after becoming subject to the standard. Given that PM emissions will have to be reduced to comply with the boiler MACT, the facility is requesting that Federally Enforceable ton per year limits be placed on the boiler to keep the PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions below the PSD significant emission rates to ensure PSD is not triggered prior to demonstrating compliance with the Boiler MACT. These requested limits are included in the calculation of the significant increase. The December 7, 2017, EPA NSR Policy Memo<sup>2</sup> addresses the issue of factoring into the projected emissions an intent to actively manage future emissions from the project on an ongoing basis to prevent a significant emissions increase or a significant net emissions increase from occurring. The memo states that EPA intends to apply the NSR regulations such that the intent of an owner or operator to manage emissions from a unit in that manner after a project is completed represents relevant information in the context of projecting future actual emissions from that unit that could be considered along with other relevant information in making an emissions projection, as provided in the NSR regulations.

Although it is not necessary to make future projections enforceable in a permitting action, inclusion of the projections in the permit will alleviate the source obligation requirements of 52.21(r)(6) in that the agreed monitoring requirements to assure that a significant increase does not occur will be included in the permit.

The project emission increases are summarized in Table 1. Increases by emission unit can be seen in Table 2. PSD review requirements are triggered for VOC only.

**Pollutant** Increase (TPY) **PSD SER PSD Review** PM – Particulate Matter 17.82 25 Ν PM<sub>10</sub> – PM less than 10 microns 14.14 15 Ν PM<sub>2.5</sub> – PM less than 2.5 microns 9.90 10 Ν VOC - Volatile Organic Compounds 355.95 40 Υ SO2 – Sulfur Dioxide 40 Ν 1.11 NOx – Oxides of Nitrogen 13.33 40 Ν CO – Carbon Monoxide Ν 41.61 100 Lead – Lead and Lead Compounds 0.00 7 Ν CO2e – Greenhouse Gas Carbon Dioxide Equivalent 16,735 75,000 Ν

Table 1 – Project Emissions Increase

<sup>&</sup>lt;sup>2</sup> New Source Review Preconstruction Permitting Requirements: Enforceability and Use of the Actual-to-Projected-Actual Aplicability Test in Determining Major Modification Applicability, E. Scott Pruitt, December 7, 2017

#### 3.2 Baseline Period Selection

Baseline actual emissions means the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 10-year period immediately preceding either the date the owner or operator begins actual construction of the project, or the date a complete permit application is received by the Administrator (MDEQ) for a permit required, whichever is earlier.

Past Annual Emissions Reporting Forms (AERF) submitted by Anderson Tully were review from the 10-year lookback window to determine the baseline period. The calendar years 2014 and 2015 were selected for all pollutants. Baseline emissions were developed using the AERF reports which are included in Appendix D. Where provided in the AERF, production data was used to calculate the baseline emissions using the same methodology and emission factor reference as used to determine the projected actuals.

#### 3.3 Baseline Emissions

#### 3.3.1 Planer Mill Baghouse (AA-001)

The existing wood handing system consists of a single baghouse and is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ). During the baseline period, emission point AA-001 consisted of four baghouses. Emissions are dependent on the amount of material transferred. The AERF reports did not detail the residual throughput and only identified the PM $_{10}$  emissions and the hours of operation.

The baseline emissions used were those reported in the AERF reports for AA-001(D). This is the baghouse and cyclone emission source which filled the boiler fuel silo. PM and PM<sub>2.5</sub> were estimated from the reported PM<sub>10</sub> value reported in the AERF report. PM and PM<sub>2.5</sub> were determined using the fractional distribution reported in the EPA Technical Memoranda for Sawmills  $^3$ . For Pneumatically conveyed material through a cyclone to bin exhausted through baghouse, this guidance lists PM<sub>10</sub>. as 99.5 % PM and PM<sub>2.5</sub> as 99% of PM.

#### 3.3.2 Wood Fired Boiler (AA-002)

The boiler is a source of the PSD criteria pollutants Carbon Monoxide (CO), Particulate Matter (PM), Particulate Matter less than 10 microns (PM<sub>10</sub>), Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>), Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Dioxide (NO<sub>2</sub>) and Volatile Organic Compound (VOC). The boilers are also sources of greenhouse gas emissions (GHG).

Baseline emissions were established on the annual heat input reported in the AERF and the stack test results from the compliance stack test performed April 24, 2014. This test included all relevant pollutants except for condensable particulate matter (CPM) lead and GHG. CPM emissions were estimated using the emission factor listed in AP-42 Table 1.6-1. "Emission Factors for PM from Wood Residue Combustion."

<sup>&</sup>lt;sup>3</sup> Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country, May 8, 2014.

Lead emissions were estimated using the emission factor listed in AP-42 Table 1.6-4. "Emission Factors for Trace Elements from Wood Residue Combustion." GHG emissions were estimated from the emission factors listed in AP-42 Table 1.6-3. "Emission Factors for Speciated Organic Compounds, TOC, VOC, Nitrous Oxide, And Carbon Dioxide from Wood Residue Combustion" and the global warming potentials listed in Table A-1 to Subpart A of Part 98.

#### 3.3.3 Sawmill (AA-006)

The sawmill consists of fugitive emission sources and is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ).

Baseline emissions for the sawmill were based on the log use reported in the AERF reports and the emission factors used for the projected emissions. Residuals generated were assumed to be like current residual generation rates based on the log weight. Emission factors applied to determine the baseline emissions were the same as those used to determine the current projected actual emissions and are from EPA Technical Memoranda for Sawmills. The debarking emission factor in the EPA Technical Memoranda is for a drum debarker. Debarking emissions from the ring debarker were assumed to be 10% of the drum debarker. Log bucking was considered to be 90% controlled also, as the log merchandiser is partially enclosed.

#### 3.3.4 Road Emissions (AA-007)

Haul roads are a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ).

The AERF reported haul road emissions based on 1 lb/hr and the number of operating hours for the boiler. The number of log trucks was estimated in the AERF. The number of residual trucks was estimated from the "Power Plant Sales" residuals divided by 26 tons per load. Emissions were calculated using the determined vehicles and the methodology from AP 42 Section 13.2.1 for paved roads and Section 13.2.2 for unpaved roads. A speed limit control efficiency of 57% for speed limits of 15 mph and below was used based on the "WRAP Fugitive Dust Handbook, 2006" given that the roads are not open roads and have short distances. The default silt value was obtain from the EPA worksheet found at <a href="https://www3.epa.gov/ttn/chief/ap42/ch13/related/r13s0202\_dec03.xls">https://www3.epa.gov/ttn/chief/ap42/ch13/related/r13s0202\_dec03.xls</a> which lists the default silt values by State. Silt loading for paved roads was taken as the lower end of the range for Municipal Solid Waste landfills.

#### 3.3.5 Lumber Treatment (AA-009) and End Coating (AA-010)

The lumber treatment and end coating units are sources of Volatile Organic Compounds (VOCs). These units are to be decommissioned and are included in the baseline under "project accounting". The VOCs reported in the AERF reports were based on materials use and were used as reported for the baseline emissions.

#### **3.3.6 Truck Loadout (AA-013)**

The truck loadout is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ).

The emissions were determined using the residual amount sold reported in the AERF and the emission factors used to determine the projected emissions. Emission factors used were from EPA Technical Memoranda for Sawmills for a drop of "wet" material.

#### 3.4 Future Emissions

#### 3.4.1 Steam Heated Dual Path Kilns (DPK-1, DPK-2)

The proposed dual path kilns are a source of Volatile Organic Compounds (VOCs), Particulate Matter (PM), Particulate Matter less than 10 microns ( $PM_{10}$ ), and Particulate Matter less than 2.5 microns ( $PM_{2.5}$ ).

VOC emissions were based on the selected BACT of 4.43 lb-VOC/MBF as WPP1 and the potential annual throughput for the kilns. PM emissions were based on the emission factor for indirect heated kilns found in the North Carolina Emission Estimation Spreadsheets for Woodwork (Lumber Kilns)<sup>4</sup> of 0.022 lb/MBF and the potential annual throughput for the kilns. PM<sub>10</sub> and PM<sub>2.5</sub> were assumed to be equal to PM.

#### 3.4.2 Planer Mill Cyclone (AA-001)

The planer mill cyclone is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM<sub>10</sub>), Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>), and Volatile Organic Compounds (VOCs).

Emissions from the cyclone have been calculated based on the projected lumber throughput at the planer mill and the resulting residuals to be transferred in the pneumatic system. Particulate emission factors used were from EPA Technical Memoranda for Sawmills for pneumatically conveyed material through high efficiency cyclone to a bin. The EPA Technical Memoranda for Sawmills does not include VOCs from cyclones. The VOCs were estimated using factors from similar facilities permitted in Mississippi.

#### 3.4.3 Wood Fired Boiler (AA-002)

The boiler is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM<sub>10</sub>), Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>), Carbon Monoxide (CO), Nitrogen Oxides (NOx), Sulfur Dioxide (SO<sub>2</sub>), Volatile Organic Compounds (VOC), Lead (Pb) and greenhouse gases (GHG).

Estimation of the projected actual emissions for the boiler were based on the average of the past three stack tests for the boiler conducted in 2020, 2018 and 2016, and the level of emissions increase necessary to stay below the PSD significant emission rates. These tests included PM, CO, NOx, SO<sub>2</sub>, and VOC. Estimates of filterable PM<sub>10</sub> and PM<sub>2.5</sub> were made using AP-42 Table 1.6-5. Cumulative Particle Size Distribution and Size-Specific Emission Factors for Wood/Bark-Fired Boilers and considering a multicyclone with fly ash reinjection. CPM emissions were estimated using the emission factor listed in AP-42 Table 1.6-1. "Emission Factors for PM from Wood Residue Combustion" and were included in the estimates of PM<sub>10</sub> and PM<sub>2.5</sub>. Lead emissions were estimated using the emission factor listed in AP-42 Table 1.6-4. "Emission Factors for Trace Elements from Wood Residue Combustion." GHG emissions were estimated from the emission factors listed in AP-42 Table 1.6-3. "Emission Factors for Speciated Organic

<sup>&</sup>lt;sup>4</sup> https://deq.nc.gov/about/divisions/air-quality/air-quality-permits/application-forms-instructions/application-forms-air-quality-permit-construct-operate-non-title-v-facilities/spreadsheets

Compounds, TOC, VOC, Nitrous Oxide, And Carbon Dioxide from Wood Residue Combustion" and the global warming potentials listed in Table A-1 to Subpart A of Part 98.

The facility is requesting ton per year limits on the boiler for PM, PM<sub>10</sub>, and PM<sub>2.5</sub>. The facility will become subject to the Major Source Boiler MACT with this modification. Compliance with the boiler MACT will be required within 3 years of beginning operation, which is outside the contemporaneous period and would not be allowed in a netting analysis. These limits in conjunction with proposed monitoring will ensure that PSD review would not have been required for the period between construction and the demonstration of compliance with the Boiler MACT.

The boiler is an existing unit subject to the "actual-to-projected-actual" applicability test. In order to determine the projected increase that results from the particular change consistent with the definition of "major modification," the owner or operator "[s]hall exclude, in calculating any increase in emissions that results from the particular project, that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions that are also unrelated to the particular project. The boiler was tested at 70.9 MMBtu/hr during the 2014 stack test. The permit required that the unit be tested at representative operating conditions and should operating conditions exceed 10% above the tested rate, a retest could be required. Given that the stack test was performed at representative conditions, the boiler could have accommodated operation up to the tested level.

The accommodated emissions were determined based on the utilization of the boiler at 70.9 MMBtu/hr for continuous operation less the average annual use reported in the baseline period, or 84,040 MMBtu/yr. The emissions were determined using the same factors as described for the baseline emissions above.

#### 3.4.4 Sawmill (AA-006)

The sawmill consists of fugitive emission sources and is a source of Particulate Matter (PM), Particulate Matter less than 10 microns ( $PM_{10}$ ), and Particulate Matter less than 2.5 microns ( $PM_{2.5}$ ).

Emissions were based on the projected log use in the sawmill and the handling of wood residuals generated. Emission factors used were from the EPA Technical Memoranda for Sawmills. Debarking emissions were assumed to be 10% of the EPA emission factor which is for a drum debarker. The facility uses a ring debarker. Log bucking was considered to be 90% controlled, as the log merchandiser is partially enclosed. Residuals generated are mechanically conveyed and the emissions were estimated based on an average of 5 drops and the emission factor for the drop of "wet" material.

#### 3.4.5 Road Emissions (AA-007)

Haul roads are a source Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ).

The haul road emissions were based on the estimated number of haul trucks to handle the projected log use and associated residuals generated. Emissions were calculated using the determined vehicles and the methodology from AP 42 Section 13.2.1 for paved roads and Section 13.2.2 for unpaved roads. A speed

limit control efficiency of 57% for speed limits of 15 mph and below was used based on the "WRAP Fugitive Dust Handbook, 2006." The default silt value was obtain from <a href="https://www3.epa.gov/ttn/chief/ap42/ch13/related/r13s0202\_dec03.xls">https://www3.epa.gov/ttn/chief/ap42/ch13/related/r13s0202\_dec03.xls</a> which lists the default silt values by State. Silt loading for paved roads was taken as the lower end of the range for Municipal Solid Waste landfills.

#### **3.4.6 Truck Loadout (AA-013)**

The truck loadout is a source of Particulate Matter (PM), Particulate Matter less than 10 microns (PM $_{10}$ ), and Particulate Matter less than 2.5 microns (PM $_{2.5}$ ).

The emissions were determined using the residual amount generated from the sawmill less the amount of residuals for boiler fuel plus the residuals generated from the planer mill. Emission factors used were from EPA Technical Memoranda for Sawmills for a drop of "wet" material for sawmill residuals and for a drop of "dry" material for the planer mill.

# 4.0 Regulatory Applicability

This section summarizes all federally enforceable and state-enforceable air regulations that will be applicable to the Project. Both applicable and important non-applicable regulations are addressed. Proposed compliance demonstration procedures are also discussed. Supporting process information for the proposed project is provided in the application forms contained in Appendix A. Information contained on the application forms are provided for determining regulatory applicability and demonstrating compliance with applicable requirements, and should not be considered proposed permit terms, limits or conditions unless specifically expressed.

# 4.1 Federal Air Quality Regulations

The federal regulations applicable to the proposed project are National Emission Standard for Hazardous Air Pollutants (NESHAP) contained in 40 CFR 63, and Title V Operating Permit regulations contained in 40 CFR 70. Of note, there are no New Source Performance Standards (NSPS) that apply to indirect-heat batch lumber dry kilns. A discussion of these applicable regulations, as well as key non-applicable regulations, is provided in this section.

### 4.1.1 Applicable Regulations

#### 4.1.1.1 Prevention of Significant Deterioration (PSD) (40 CFR Part 52)

Under the prevention of significant deterioration (PSD) requirements, all new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA) must undergo a preconstruction review consistent with Section 165 of the Act prior to beginning actual construction. A "major stationary source" is defined as any one of 28 named source categories which has the potential to emit 100 tons per year (tpy) or more, or any other stationary source which has the potential to emit 250 TPY or more, of any pollutant regulated under the CAA. Vicksburg Forest Products is not one of the listed source categories with a 100 tpy threshold; therefore, the major source threshold for the proposed facility is 250 tpy of any regulated pollutant. Vicksburg Forest Products currently has the potential to emit VOC above the PSD threshold of 250 tpy. Therefore, the facility is classified as a PSD major stationary source and is subject to the PSD requirements.

#### 4.1.1.2 New Source Performance Standards (40 CFR Part 60)

New Source Performance Standards have been promulgated to govern the emissions of certain sources of air pollutants modified, constructed, or reconstructed after the applicability dates of the regulations. None of the New Source Performance Standards apply to the project processes.

#### 4.1.1.2.1 40 CFR 60 Subpart Db -Steam Generating Units (Not Applicable)

NSPS Subpart Db — Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units applies to each steam generating unit that is capable of combusting greater than 100 MMBTU/hr of fuel and for which construction, reconstruction, or modification is commenced after June 19, 1984. The heat input capacity of the boiler (AA-002) of 98.4 MMBtu/hr is less than the 100 MMBtu/hr threshold. The boiler is not subject to NSPS Subpart Db.

### 4.1.1.2.2 40 CFR 60 Subpart Dc - Small Steam Generating Units

NSPS Subpart Dc — Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units applies to each steam generating unit that is capable of combusting between 10 and 100 MMBtu/hr (inclusive) of fuel, and for which construction, reconstruction, or modification is commenced after June 9, 1989. The facility boiler has a heat input capacity (98.4 MMBtu/hr) that falls within this range. The boiler was installed before June 9, 1989, and Subpart Dc does not apply.

# **4.1.1.2.3 40** CFR **60** Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (Not Applicable)

NSPS Subpart IIII – Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE)14, was promulgated by EPA on July 11, 2006. This subpart applies to manufacturers, owners, and operators of stationary CI ICEs that commence construction after July 11, 2005, or those that are modified or reconstructed after July 11, 2005, according to 40 CFR 60.4200(a)(3),(4) dated June 28, 2011. No internal combustion engines are proposed or affected by the project.

#### 4.1.1.3 National Emission Standards for Hazardous Air Pollutants (40 CFR Parts 61 and 63)

Potentially applicable subparts of the pollutant specific NSESHAP (40 CFR 61) program or the Source Category NSESHAP (40 CFR 63) are identified below.

#### 4.1.1.3.1 40 CFR 61, Subpart M (Asbestos)

Subpart M is the pollutant-specific NESHAP for asbestos. This NESHAP is potentially applicable to the Vicksburg Forest Products facility and requires proper inspection, procedures, and documentation of any asbestos removal project. The project does not include the removal of any structures.

#### 4.1.1.3.2 40 CFR 63, Subpart DDDD (Plywood and Composite Wood Products)

National Emission Standards for Hazardous Air Pollutants have been promulgated to govern the emissions of certain Hazardous Air Pollutants. 40 CFR 63.2230-2292, Subpart DDDD (Plywood and Composite Wood Products) applies to lumber kilns at major sources of hazardous air pollutants (HAPs). Upon construction of the proposed project, the facility will become a major source of HAPs and will be subject to Subpart DDDD. The only applicable requirement is the initial notification.

# 4.1.1.3.3 40 CFR 63 Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) (Not Applicable)

The Reciprocating Internal Combustion Engine (RICE) NESHAP, Subpart ZZZZ, was promulgated on June 15, 2004, and was revised on January 15, 2013. Subpart ZZZZ regulates HAP emissions from RICE at facilities that are major sources of HAPs. The Mill does not operate RICE engines and accordingly, is not subject to Subpart ZZZZ.

#### 4.1.1.3.4 40 CFR 63 Subpart DDDDD (Small Boilers & Process Heaters -Boiler MACT)

The Industrial-Commercial-Institutional Boilers and Process Heaters NESHAP, Subpart DDDDD, was signed February 26, 2004. This Subpart, also known as the Boiler MACT, regulates HAP emissions from solid, liquid, and gas-fired steam generating units. Subpart DDDDD regulates boilers and process heaters located at facilities that are major sources of HAPs. Upon construction and beginning of operation of the proposed project, the facility will be a major source of HAPs and will be subject to Subpart DDDDD.

Compliance with the requirements of Subpart DDDDD must be demonstrated within three years of beginning operation of the proposed project.

### 4.1.1.3.5 Subpart JJJJJJ (Area Source Boiler MACT)

The Industrial, Commercial, and Institutional Boilers Area Sources NESHAP, Subpart JJJJJJ, regulates HAP emissions from sources that operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195. As an area source, Vicksburg Forest Products is currently subject to and complies with Subpart JJJJJJ. After the construction and operation of the proposed project, the facility will be a major source of HAPs and Subpart JJJJJJ will no longer be applicable.

#### 4.1.1.4 Compliance Assurance Monitoring (40 CFR Part 64)

Under 40 CFR Part 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. The CAM Plans provide an on-going and reasonable assurance of compliance with emission limits. Under the general applicability criteria, this regulation only applies to emission units that use a control device to achieve compliance with an emission limit and whose pre-controlled emission levels exceed the major source thresholds under the Title V permitting program. For an emission unit whose post-controlled emissions are less than the major source emission thresholds, a CAM plan is required to be submitted with the first Title V permit renewal application.

There are no sources at the facility that employ a control device as defined in the CAM regulations, and therefore, 40 CFR Par 64 does not currently apply. The Part will apply with any addition of a control device on the boiler (AA-002) as appropriate to comply with the Boiler MACT.

#### 4.1.1.5 Chemical Accident Prevention Provisions (40 CFR Part 68)

Subpart B of 40 CFR 68 outlines requirements for risk management prevention plans pursuant to Section 112I of the Clean Air Act Applicability to this subpart is determined based on type and quantity of chemicals stored at the Mill. The amount of Section 112I substances stored at the facility do not trigger applicability of the risk management plan regulations of 40 CFR 68 Subpart B.

#### 4.1.1.6 Stratospheric Ozone Protection (40 CFR Part 82)

The requirements originating from Title VI of the Clean Air Act, entitled Protection of Stratospheric Ozone, are contained in 40 CFR 82. Subparts A through E, Subpart G, and Subpart H of 40 CFR 82 are not applicable to the Mill. 40 CFR 82 Subpart F, Recycling and Emissions Reduction, potentially applies if the facility operates, maintains, repairs, services, or disposes of appliances that utilize Class I or Class II ozone depleting substances. Subpart F requires persons completing the repairs, service, or disposal be properly certified. All repairs, service, and disposal of ozone depleting substances from subject appliances at the facility are completed by certified technicians.

# 4.2 Mississippi Air Quality Regulations

The following paragraphs discuss MDEQ air quality control regulations and the applicability of these regulations to the project emission sources at the Mill. Further information on source-specific regulations is provided below.

### 4.2.1 Applicable Federally Enforceable State Regulations

#### 4.2.2 State Only Regulations

#### 4.2.2.1 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.3.A. - Smoke

Rule 1.3.A. limits startup opacity levels greater than 40% to no more than 15 minutes per startup in one hour and no more than three startups in any twenty-four-hour period. Additionally, emissions from soot blowing operations are allowed provided that 60% opacity shall not be exceeded and that during any twenty-four hour period, aggregate soot blowing does not exceed ten minutes per billion BTU gross heating value of fuel in anyone hour. This regulation applies to the existing wood-fired boiler (AA-002).

#### 4.2.2.2 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.3.B.- Equivalent Opacity

Rule 1.3.B. restricts visible emissions from stationary sources (not including uncombined water droplets) to less than 40 percent opacity. This regulation applies to the proposed steam-heated dual path kilns and the wood handling transfer cyclone.

#### 4.2.2.3 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.3.C. - - General Nuisances

Rule 1.3.C. pertains to general nuisances from particulate matter emissions. Precautions are to be taken to reduce unnecessary emissions from handling, transport, or storage of materials. If particulate matter emissions cause a nuisance on adjacent property or violate a regulation, control measures may be imposed by MDEQ. This requirement is applicable to the handling of wood residuals and the emissions from road traffic.

# 4.2.2.4 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.3.D. – Fuel Burning, Combination Boilers

The wood-fired boiler (AA-002) is subject to Rule 1.3.D.(2). This regulation limits particulate matter emissions to 0.3 grains/dscf when utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, or spent wood.

# 4.2.2.5 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.3.F. – Manufacturing Processes, General

Process emission sources are subject to Subsection Rule 1.3.F.(1). This regulation limits particulate matter emissions on the following equation, known as the process weight rule:

$$E = 4.1p^{0.67}$$

Where, E is the emission rate (lb/hr), and P is the process weight input rate (ton/hr).

MDEQ considers a process to consist of units that operate in sequential, direct, and relatively dependent fashion. For the Mill, the primary process is the lumber manufacturing. The weight of the logs used in the process area would be considered the process weight input rate for emission units involved in lumber production.

# 4.2.2.6 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.4.A. – Sulfur Dioxide Emissions from Fuel Burning

Rule 1.4.A. limits  $SO_2$  emissions from fuel burning operations to 4.8 lbs/MMBtu and from modified units to 2.4lb/MMBtu. The wood-fired boilers (AA-002) is unmodified and are thus limited to 4.8 lb/MMBtu  $SO_2$  emissions.

# 4.2.2.7 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.4.B.(1) – Sulfur Dioxide Emissions from Processes

Rule 1.4.B.(1) prohibits emissions of  $SO_2$  in excess of 2000 parts per million by volume (ppmv) from existing process equipment and 500 ppmv from new process equipment. While this regulation applies to all process equipment,  $SO_2$  emissions are negligible.

# 4.2.2.8 Mississippi Regulation Title 11, Part 2, Chapter 1, Rule 1.4.B.(2)- Hydrogen Sulfide Emissions from Processes

Rule 1.4.B.(2) prohibits emissions of hydrogen sulfide in excess of 1 grain/100 standard cubic feet (set) from any gas stream. Although this regulation applies to all emission sources at the facility, there is no quantifiable hydrogen sulfide emissions from any emission source expected.

**4.2.2.9 Mississippi Regulation Title 11, Part 2, Chapter 5.- Requirements for PSD of Air Quality** Upon issuance of the construction permit for this permitting action, the facility will be a PSD major source and must evaluate PSD permitting applicability for all projects.

# 4.2.2.10 Mississippi Regulation Title 11, Part 2, Chapter 6.- Title V Operating Permit Regulations

The facility was reissued Title V Permit No. 2780-00004 on March 25, 2016, under the Title V operating permit program of Mississippi Regulation APC-S-6. The Title V operating permit will be expired on February 28, 2021.

# 5.0 Best Available Control Technology Analysis

#### 5.1 Introduction

In accordance with PSD requirements listed in 40 CFR 51.166(J) and 52.21(J) and 11 Miss. Admin. Code Pt. 2, Ch. 5. Rule 5.1, a facility must apply Best Available Control Technology (BACT) for the control of each regulated air pollutant emitted in significant quantities from a new major stationary source or resulting from a major modification of an existing source located in an attainment area for that pollutant. The proposed project at the Vicksburg Forest Products, Waltersville Mill results in an actual-to-potential VOC emissions increase above the VOC significant emissions rate for major modifications, and therefore, this process change is subject to a BACT review for VOC.

The BACT requirements are intended to ensure that a proposed facility or major modification will incorporate air pollution control systems that reflect the latest demonstrated practical techniques for each particular emission unit, and will not result in the exceedance of a National Ambient Air Quality Standard (NAAQS), PSD Increment, or other standards imposed at the State level.

#### 5.2 Kiln Exhaust Characteristics

Traditional batch lumber kilns are generally equipped with 10 to 20 individual roof vents spaced equidistantly following the ridge of the roof. An equal number of vents are located on each side of the kiln roof, and each set of vents reacts in unison during the kiln drying cycle. At any given time, one set of vents allow moisture to exhaust from the kiln while the other set of vents allow dry make-up air to enter from the atmosphere.

Dual Path Kilns (DPKs) have no vents and are enclosed structures except for the doors at each end. Each kiln has a double track that allows the lumber packages to travel through the kiln in opposite directions. Steam coils are in the ceiling and vertically along the center of the kilns. Multiple fans are located inside the kilns, and these fans circulate air within the kilns. Each end of the kilns is equipped with a powered vent stack which draws most of the exhaust to an elevated release to aid in visibility for worker safety.

# 5.3 Top-Down BACT Approach

EPA recommends a "top down" approach when evaluating available air pollution control technologies. The first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical source or source category. If it can be shown that this level of control is technically or economically infeasible for the unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until a control technology and associated emission level is determined that cannot be eliminated by any technical, environmental, or economic objections. The top-down BACT evaluation process is described in U.S. EPA's draft document "New Source Review Workshop Manual" (U.S. EPA, October 1990). The five steps involved in a top-down BACT evaluation are:

- Step 1. Identify all control technologies;
- Step 2. Eliminate technically infeasible or unavailable technology options;
- Step 3. Rank the remaining control technologies by control effectiveness;

Step 4. Evaluate the most effective controls and document the results; if the top option is not selected as BACT, evaluate the next most effective control option;

Step 5. Select BACT

When conducting the BACT analysis, one must include consideration of the most stringent technologies. Any decision to require a lesser degree of emissions reduction must be justified by an objective analysis of energy, environmental, and economic impacts. Furthermore, if a facility is subject to a New Source Performance Standard (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP), the minimum control efficiency to be controlled in a BACT analysis must result in an emission rate less than or equal to the NSPS and/or NESHAP emission rate.

The "top down" approach has been employed in this analysis to evaluate available pollution controls for the proposed process modification.

#### 5.3.1 Control Technologies

Available control technologies for the control of VOC emissions were identified through research of the RACT/BACT/LAER Clearinghouse (RBLC), literature review, and surveying of previous applications submitted for continuous kilns. A review of these sources did not reveal any facilities that use add on controls for lumber drying kilns. However, a search was also conducted for VOC control technologies for other processes that could potentially be applied for a lumber dry kiln. The control technologies evaluated are combustion (thermal and catalytic), adsorption, biofiltration, condensation, wet scrubbing, and good work practices.

#### **5.3.1.1** *Combustion*

This technology may be applied using different approaches including regenerative thermal oxidation, or catalytic oxidation, boilers, and process heaters. VOC laden air streams are used as fuel sources and high VOC content streams can see destruction efficiencies as high as 99%; depending on the exact characteristic of the incoming air stream and the technology used.

Incineration has been successfully applied to aluminum chip dryers, petroleum processing and marketing operations, animal blood dryers, automotive brakeshoe debonding ovens, citrus pulp dryers, coffee roasters, wire enameling ovens, foundry core ovens, meat smokehouses, paint baking ovens, varnish cookers, paper printing and impregnating installations, pharmaceutical manufacturing plants, sewage disposal plants, chemical processing plants, and textile finishing plants.

#### 5.3.1.2 Thermal Oxidization and Catalytic Oxidation

Regenerative Thermal Oxidizers or RTOs use a high-density media, such as ceramic-packed bed still hot from a previous cycle, to preheat an incoming VOC-laden waste gas stream. The preheated, partially oxidized gases then enter a combustion chamber where they are heated by auxiliary fuel (natural gas) combustion to a final oxidation temperature typically between 760 °C to 820 °C (1400 to 1500 °F) and maintained at this temperature to achieve maximum VOC destruction; however, temperatures of up to 1100 °C (2000 °F) may be achieved, if required, for very high control efficiencies of certain toxic VOC.

The purified, hot gases exit this chamber and are directed to one or more different ceramic-packed beds cooled by an earlier cycle. Heat from the purified gases is absorbed by these beds before the gases are

exhausted to the atmosphere. The reheated packed bed then begins a new cycle by heating a new incoming waste gas stream.

A Regenerative Catalytic Oxidizer or RCO operates in the same manner as an RTO; however, it uses a catalyst material rather than ceramic material in the packed bed. This allows for destruction of VOC at a lower oxidation temperature. An RCO uses a precious metal catalyst in the packed bed, allowing oxidation to occur at approximately 400 °C (800 °F). The lower temperature requirement reduces the amount of natural gas needed to fuel the VOC abatement system and the overall size of the incinerator. Catalysts typically used for VOC incineration include platinum and palladium.

VOC destruction efficiency depends upon design criteria. Typical regenerative incinerator design efficiencies range from 59 to 99% for RTO systems and 90 to 99% for RCO systems, depending on system requirements and characteristics of the contaminated stream. Lower control efficiencies are generally associated with lower concentration flows.

#### 5.3.1.3 Adsorption

Adsorption is the use of a solid material to trap a gas. The material most commonly used is carbon, a highly porous material. Adsorption occurs in two ways: (1) physical adsorption, in which van der Waal's forces attract and hold gas molecules to the adsorbent surface, and (2) chemical adsorption, in which gas molecules are chemically bonded to the adsorbent. Additionally, within the capillaries of the porous solid, surface adsorption is supplemented by capillary condensation. The VOC is usually recovered by stripping the organic from the carbon by heating with steam.

Activated carbon is the most widely used adsorbent for recovering VOC. Carbon adsorption is usually more economical than combustion for the control of organic compounds in low concentrations where the cost of supplemental fuel can be very high. Depending on the application, carbon adsorption efficiencies can be at least 95 percent. In addition, this control technique offers recovery of adsorbed organic which can be recycled to the process or used as fuel. Recovery and reuse has gained greater favor by industries.

Adsorption systems have been used successfully in the following industries: organic chemical processing, varnish manufacture, synthetic rubber manufacture, production of selected rubber products, pharmaceutical processing, graphic arts operations, food production, dry cleaning, synthetic fiber manufacture, and some surface coating operations.

#### 5.3.1.4 Biofiltration

In biofiltration, off-gases containing biodegradable organic compounds are vented, under controlled temperature and humidity, through a biologically active material. The process uses a biofilm containing a population of microorganisms immobilized on a porous substrate such as peat, soil, sand, wood, compost, or numerous synthetic media. As an air stream passes through the biofilter, the contaminants in the air stream partition from the gaseous phase to the liquid phase of the biofilm. Once contaminants pass into the liquid phase, they become available for the complex oxidative process by the microorganisms inhabiting the biofilm.

#### 5.3.1.5 Condensation

Condensation is the physical change from the vapor to liquid phase. Condensers operate in either of two ways: (1) the most common is a constant pressure system where the temperature of the gas stream is reduced to cause the desired condensable materials to liquefy, or (2) less common is the technique of increasing the pressure of a gas stream to cause the combustible material to liquefy. Condensation is also commonly applied to a gas stream to reduce VOC concentrations before the stream is routed to the other "add-on" devices.

Condensers have been used successfully in bulk gasoline terminals, petroleum refining, petrochemical manufacturing, dry cleaning, degreasing, and tar dripping.

The VOC efficiency achieved by a condenser, as a sole add-on control device, is a function of: 1) the heat capacity and temperature of the inlet exhaust stream, 2) the heat transfer characteristics of the condenser (including the heat transfer area and the heat transfer coefficient), and 3) the outlet temperature of the exhaust gas exiting the condenser.

Condensers are most effective in single component systems involving emission streams with a high percentage of a condensable VOC, because less heat must be removed from the exhaust gas to reduce the sensible heat of non-condensable gases and the required condenser temperature to achieve high levels of recovery. Unlike other VOC control devices for which quantifying control efficiency can require emissions testing, only the outlet exhaust gas temperature is required to estimate the VOC control efficiency of a condenser if the temperature, VOC concentration, and flow rate of the non-condensables in the inlet exhaust stream are all known. Since the control efficiency of a condenser is dynamic, based on the outlet temperature and inlet concentration of VOC in the exhaust stream, condensers exhibit a wide range of VOC control efficiency from as low as 50 percent to as high as 99 percent.

#### 5.3.1.6 Wet Scrubbing

Scrubbing of gas or vapor pollutants from a gas stream is usually accomplished in a packed column (or other type of column) where pollutants are absorbed by countercurrent flow of a scrubbing liquid. Scrubbing liquid can be water, caustic solution, or other liquid media.

#### 5.3.1.7 Proper Maintenance and Operating Practices

Proper maintenance and operating practices are comprised of work practice and operational standards and recordkeeping and reporting requirements. The establishment of these good operating practices is intended to minimize VOC emissions from the kilns to the extent practicable. This method involves no add-on pollution controls. However, written procedures of best management practices, proper maintenance and operating activities can be an effective abatement technique when combined with training of employees and appropriate recordkeeping.

#### 5.3.2 Control Technologies Eliminated Based on Feasibility

#### 5.3.2.1 Thermal Oxidation and Catalytic Oxidation

Thermal oxidation is typically done with a regenerative thermal oxidizer (RTO). To achieve destruction and removal efficiency greater than 90%, a temperature of approximately 1500 °F is required and a

minimum residence time of at least one second are required. The exit temperature from the kiln would be well below this required temperature. Furthermore, the resinous nature of the VOCs released during the drying operation inside the kiln would cause issues with the duct work and media in the device over time. Due to the high moisture content, resinous characteristics of the VOCs released and low exit temperature in the exhaust stream, thermal oxidation technology is technically infeasible to be used in this process.

Oxidation can also be achieved with a Regenerative Catalytic Oxidizer (RCO). The required temperature to achieve the desired destruction efficiency inside the RCO is 500-800°F. Even though the temperature is lower than required for an RTO, it is still higher than the typical temperature from the kiln exhaust. As with the RTO, the resinous nature of the VOCs released during the drying operation would create fouling issues in the duct work and the catalyst media. Catalytic oxidation is therefore technically infeasible to be used in this process.

#### 5.3.2.2 Adsorption

Activated carbon can be used to adsorb the VOC in into the activated carbon substrate. However, the high moisture content of the exhaust and its resinous nature would reduce the capacity and efficiency of the carbon. At high moisture content, the water molecules and the VOC in the exhaust stream would compete for active adsorption site, rendering the system ineffective. Therefore, this control device is technically infeasible to be used in this process.

#### 5.3.2.3 Condensation

Condensation requires that the exhaust stream be cooled to a low enough temperature to allow for the VOC to go from a gas phase to liquid phase. The primary constituent of the VOC in the exhaust stream from the lumber kilns is terpenes, which would require the temperature of the exhaust stream to be lowered to well below 0 °F in order to have a low enough vapor pressure to use condensation. Temperatures this low would cause the water vapor in the stream to freeze, and the ice would clog the unit. As such, condensation is not a technically feasible control technology.

#### 5.3.2.4 Biofiltration

Microbial activity within the filter media is readily affected by temperature conditions. Mesophilic conditions (25-40°C) are ideal for biofiltration operations and most biofilters consequently operate in ambient temperatures. Some microbes are known to function effectively in thermophilic conditions (40-55°C). In cases of extreme temperatures, cell components can begin to decompose and proteins within enzymes can become denatured and ineffective. The temperature of the exhaust stream from the kilns will be approximately 150 °F (65°C) which exceeds the typical operational temperature of biofilters.

The primary constituent of the VOC in the exhaust stream is terpenes, which are highly viscous and would cause the biofilter to easily foul. Because of the nature of the long-chained hydrocarbons in the exhaust stream, a biofilter with a reasonable footprint/retention time, will have a reduced control efficiency. The microorganisms require a much longer retention time/size of a unit to provide an increased efficiency.

No installations of biofilters in lumber mills are known. Application of biofiltration technology for VOC removal from lumber kiln emissions has not been demonstrated. Due to the temperature requirement,

the large land requirement, and the unproven ability of biofiltration to operate successfully for VOC removal from lumber kiln emissions, this control technology is considered technically infeasible.

#### 5.3.2.5 Wet Scrubbing

While some VOCs that will be present in the exhaust stream are highly soluble in water, other VOCs, most notably  $\alpha$ -pinene, are only very slightly soluble in water. Lower solubility VOCs would require much longer residence time within a scrubber packed column and would eliminate this as a technically viable solution for the constant stream that would need to be handled by a continuous kiln. Wet scrubbing for VOC removal is also technically infeasible for application in drying kilns due to the disruption in air flow created by this type of add-on control. A vacuum blower would be necessary to route kiln emissions to the wet scrubber. The installation of a vacuum blower would affect the temperature and moisture content of the kiln atmosphere and degrade the quality of the lumber product.

#### 5.3.2.6 Ranking of Control Technologies

Since all add on control devices have been demonstrated to be technically infeasible for the kilns, proper kiln design and operation remains the only feasible option for control of VOC emissions.

# 5.4 Evaluation of Control Options

Based on the top-down BACT analysis, Vicksburg Forest Products has determined proper kiln design, maintenance, and good operating practices are only feasible options, that are both technically and economically sound.

A search of the RACT/BACT/LAER database for the 2010-2020 showed a range of limits or basis for limits between 3.5 and 5.8 lb/MBF of VOC. The variability is due in part on how the VOC determination was made, how the VOC is expressed, whether the value has been corrected by adding formaldehyde and methanol as well as the variation in VOC content of lumber throughout the year, based on temperature and moisture content.

A BACT emission limit of 4.43 lb/MBF as WPP1 was chosen from this range as it representative of the industry. Vicksburg Forest will follow this initial operation maintenance plan outlined below:

- 1. Operation of the kilns in accordance with manufacturer's recommendations
- 2. Routines for preventative maintenance will be as detailed in a monitoring plan based on manufacturer's recommendations. The plan will at a minimum identify the frequency of maintenance for the following activities:
  - Walk around inspection.
  - Wet bulb proper operation
  - Entrance/exit baffles inspection
  - Grease kiln cart wheels and fan shaft bearings.
  - Check hydraulic oil levels
  - Calibration of moisture content equipment
  - Temperature probe calibration.

# **6.0 Source Impact Analysis**

The owner or operator of a proposed source or modification is required to demonstrate that allowable emission increases from the proposed source or modification, in conjunction with all other applicable emissions increases or reductions (including secondary emissions), will not cause or contribute to air pollution in violation of: 1) any national ambient air quality standard in any air quality control region; or 2) any applicable maximum allowable increase over the baseline concentration in any area.

# 6.1 Existing Air Quality

Any application for a permit under the Prevention of Significant Deterioration program is required to contain an analysis of ambient air quality in the area that the major stationary source or major modification would affect for each of the following pollutants: a) for the source, each pollutant that it would have the potential to emit in a significant amount; b) for the modification, each pollutant for which it would result in a significant net emissions increase.

The pollutant under consideration in the analysis is volatile organic compounds (VOC). The existing air quality is defined by the natural and human-generated sources of air pollution. The area surrounding the Warren County facility is a mixture of developed and undeveloped land. Overall, the area is rural and in attainment for all regulated pollutants.

# 6.2 Air Quality Monitoring Requirements

The ambient air quality analysis is required to contain continuous air quality monitoring data gathered for purposes of determining whether emissions of that pollutant would cause or contribute to a violation of the standard or any maximum allowable increase. The source may be exempt from the preconstruction monitoring requirements if the air quality impacts are less than the monitoring de minimis concentrations.

No de minimis air quality level is provided for ozone. However, any net emissions increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD would be required to perform an ambient impact analysis, including the gathering of ambient air quality data. The emission increase from the project of 435 tons VOC per year is above the 100 ton per year threshold. Vicksburg Forest Products proposes to use the existing air quality monitor located in Jackson, MS to determine the background air quality in lieu of conducting preconstruction monitoring. The proposed monitor is in Hinds County, which is adjacent to Warren County, the county for the proposed modification. Figure 4 and Figure 5 illustrate the VOC emissions for the two counties. The emissions of VOC are comparable for the two counties by emissions sector. The population of Jackson, MS is approximately 164,000 and the population in Vicksburg is approximately 22,000. Given the population difference and the similar distribution of emission by sector, the Jackson monitor would be a conservative estimate of the air quality at the facility. The MDEQ 2019 Air Quality Data Summary indicates the design value for the Jackson monitor is 63 ppb. The monitor demonstrates compliance with the new ozone standard of 70 ppb.

# 6.3 Dispersion Modeling

In rural air in the southeast there are large sources of VOCs associated with emissions from forests that tend to lead to large VOC/NOx ratios. Consequently, the rural areas tend to be NOx sensitive.

The US EPA has recommended a significant impact level for the  $O_3$  8-hour standard of 1.0 ug/m<sup>3</sup>. Additionally, guidance has been issued that reflects the EPA's recommendations for how air agencies may conduct air quality modeling and related technical analyses to satisfy compliance demonstration requirements for ozone and secondary  $PM_{2.5}$  for permit-related assessments under the Prevention of Significant Deterioration (PSD) program. This guidance presents the EPA's modeling of hypothetical single source impacts on  $O_3$  and secondary  $PM_{2.5}$ . The modeling performed by EPA accounts for variation across the domain due to sensitivity of local air shed air quality to precursor emissions and reflects the regional or local atmospheric conditions for particular situations.

EPA released the MERPs VIEW Qlik application (<a href="https://www.epa.gov/scram/merps-view-qlik">https://www.epa.gov/scram/merps-view-qlik</a>) to provide access to EPA's hypothetical single source modeled impacts of  $O_3$  and  $PM_{2.5}$  to support PSD applications. The most conservative MERP from the South Climate Zone (2307 TPY VOC) was used to estimate the impacts from the proposed project as:

modeled air quality impact = (Critical Air Quality Threshold) (Project Emissions/ MERP)

where the critical air quality threshold equals the ozone SIL of 1 ppb, the project emissions are 435 TPY VOC and the MERP is 2,307 TPY VOC, yielding a 0.0023 ppb worst case impact from the project. This value is well below the ozone significant impact level and the project will not cause a significant ambient impact for ozone.

# 6.4 Vegetation and Soils Impact

VOCs are regulated as precursors to tropospheric ozone. Elevated ground-level ozone concentrations can damage plant life and crop production. VOCs interfere with the ability of plants to produce and store food, making them more susceptible to disease, insects, or other pollutants and harsh weather. Ozone is formed by the interaction of NOx, VOC, and sunlight in the atmosphere. As the project potential for ozone formation due to emissions from the facility is insignificant, no adverse impacts on soils and vegetation is anticipated.

#### 6.5 Associated Growth

There will be fifty new employees due to the project. This personnel will be selected from the existing work force in the area and there will be no additional demand on housing or public utilities. No growth due to support facilities is anticipated.

# 6.6 Class I Impact

The need to address air quality related values (AQRVs) in Class I areas is determined by the magnitude of the visibility impairing pollutants. The federal land manager guidance presumes that a project will have insignificant impacts if the maximum daily increase in visibility impairing pollutants expressed as tpy (Q)divided by the distance to the Class I in kilometers (D) is less than 10. The increase of visibility impairing pollutants due to the project are below the PSD significant emission rates and a Class I analysis on AQRVs is not necessary. There is no PSD increment for Ozone, therefore, no analysis is required for Class I increment impacts.

# 7.0 Proposed Emissions Limits and Permit Conditions

### 7.1 Steam-heated Dual Path Kilns (DPK-1 & DPK-2)

BACT was selected as 4.43 lb-VOC as WPP1 and good work practices which follow the manufacturer's recommendation and preventative maintenance.

### 7.2 Wood-fired Boiler (AA-001)

The boiler will become subject to the Major Source Boiler MACT with the proposed modification. A demonstration of compliance with the boiler MACT will be required within three years of beginning operation of the modification. Any decrease in emission from compliance with the boiler MACT will be outside of the contemporaneous period and not creditable. To ensure that PSD review is not triggered between beginning operation and complying with the boiler MACT the facility is proposing to actively managed the PM emissions from the boiler, as allowed by the NSR regulations. The ton per year limits at the boiler that would trigger significance are as follows:

- PM 108.35 tpy
- PM<sub>10</sub> 105.30 tpy
- PM<sub>2.5</sub> 65.21 tpy

Although it is not necessary to make future projections enforceable in a permitting action, inclusion of the projections in the permit will alleviate the source obligation requirements of 52.21(r)(6) in that the agreed monitoring requirements to assure that a significant increase does not occur will be included in the permit.

The facility is currently required to track the rolling 52-week steam usage. It is proposed that the boiler will be stack tested within 6 months of beginning operation for PM, PM<sub>10</sub> and PM<sub>2.5</sub> to develop emission factors related to the steam production. Compliance with the ton per year limits will be demonstrated by tracking the annual emissions by using the steam production and the developed emission factors.

Boiler efficiency will be determined during the stack test as Mlb-steam/MMBtu. The emissions of PM,  $PM_{10}$ ,  $PM_{2.5}$  and CPM will be determined during the stack test as lb-Pollutant/MMBtu. The emission factor (EF) will then be determined based on the steam production during the test as lb-Pollutant/Mlb-steam. The emissions will then be determined on a 52-week rolling basis as:

TPY = (52-wk steam production Mlb/yr)(EF lb-Pollutant/Mlb-steam)(ton/2000 lb)

Emissions for the remaining units can be assured to be below the determined projections by tracking the facility production.

#### **7.2.1** Source Obligation **52.21(r)(6)**

This section applies in circumstances where there is a reasonable possibility that a project that is not a part of a major modification may result in a significant emissions increase of such pollutant. Based on the calculated emissions increase, there is a reasonable possibility that the significant emission rates could be exceeded. The requirements of 52.21(r)(6) are applicable.

#### 7.2.2 Information Requirements

#### 7.2.2.1 Project Description

A description of the proposed project is included in this application and satisfies the requirement.

#### 7.2.2.2 Affected Emissions Units

The affected emissions units are identified in the application and accounted for in determining the project increases.

### 7.2.2.3 Applicability Test

The applicability test summarized in Table 2 illustrates the project increases by emission unit. The pollutants with a reasonable possibility of exceeding the PSD significant emission rates are PM,  $PM_{10}$  and  $PM_{2.5}$ . Most of these emissions are from the boiler. Except for the planer cyclone, the remaining emission sources are fugitive.

#### 7.2.2.3.1 Emissions Monitoring

Apart from the wood-fired boiler, the emissions will be monitored by tracking the facility production of produced lumber and calculating the emissions as presented in the applicability test. The boiler emissions will be determined by tracking the steam production and applying the developed emission factors from stack testing on an annual basis. The emissions will be tracked for a period of 5 years.

# **Figures**

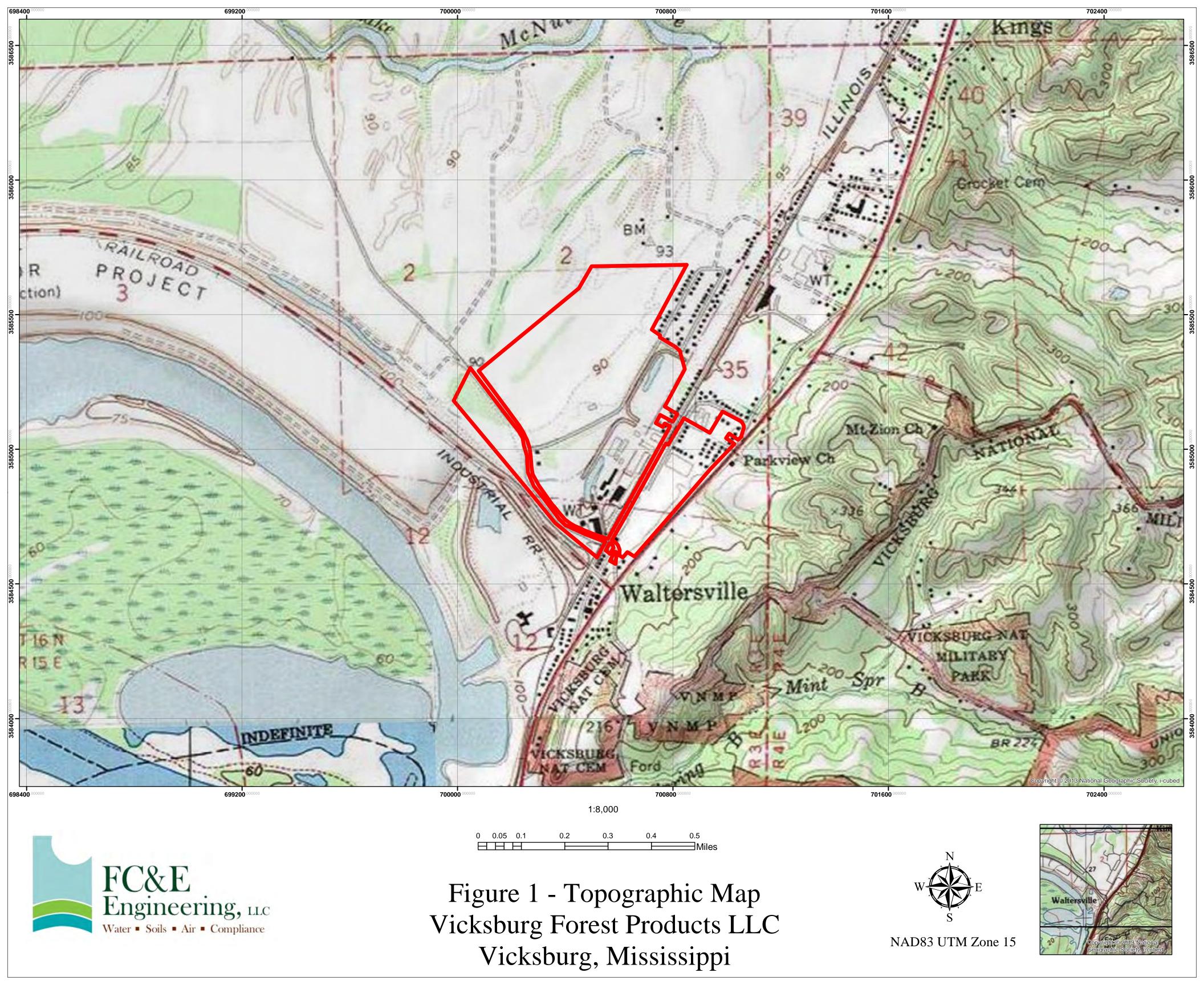
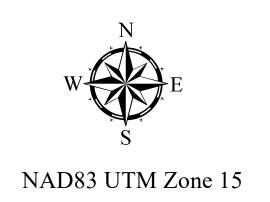
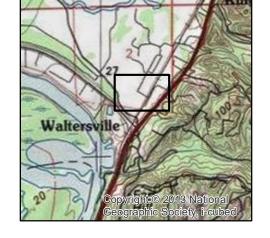


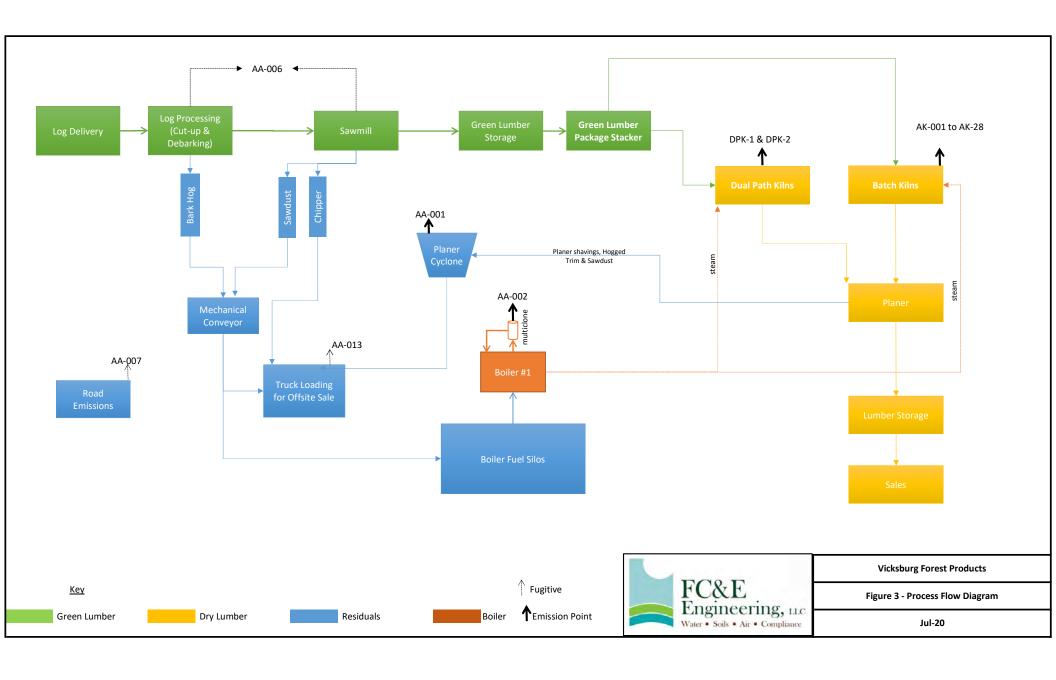




Figure 2 - Facility Layout Vicksburg Forest Products LLC Vicksburg, Mississippi







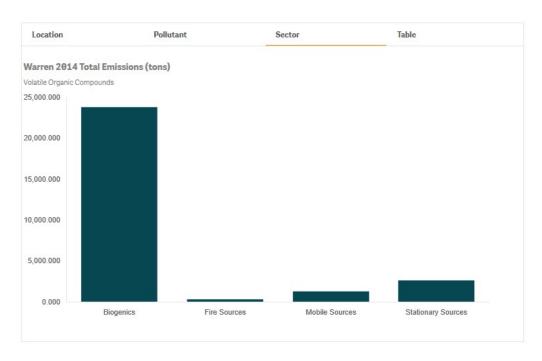


Figure 4 – VOC Emissions in Warren County by Sector, 2014 National Emissions Inventory

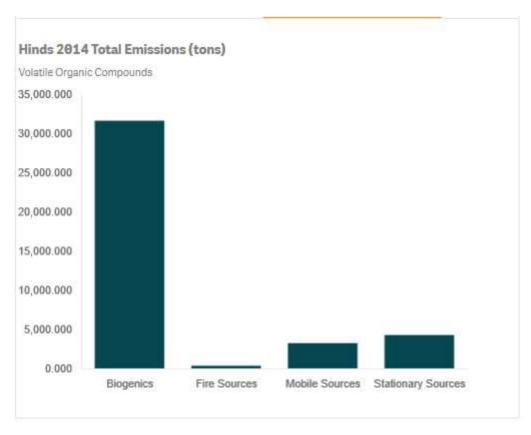


Figure 5 – VOC Emissions in Hinds County by Sector, 2014 National Emissions Inventory

https://edap.epa.gov/public/extensions/nei\_report\_2014/dashboard.html#sector-db

## **Tables**

Table 1 – Project Emissions Increase

Pollutant	Increase (TPY)	PSD SER	PSD Review
PM – Particulate Matter	17.82	25	N
PM <sub>10</sub> – PM less than 10 microns	14.14	15	N
PM <sub>2.5</sub> – PM less than 2.5 microns	9.90	10	N
VOC – Volatile Organic Compounds	355.95	40	Υ
SO2 – Sulfur Dioxide	1.11	40	N
NOx – Oxides of Nitrogen	13.33	40	N
CO – Carbon Monoxide	41.61	100	N
Lead – Lead and Lead Compounds	0.00	7	N
CO2e – Greenhouse Gas Carbon Dioxide Equivalent	16,735	75,000	N

					Projected		Adjusted	Base	eline Emissio	ons					
Emissions Unit	Dallutant		Units	Reference	Actual Emissions	Accomodated	Projected Actual	2015	2014	2 vm Ava	Emissions				
Emissions Unit	Pollutalit	EF	Offics	Maximum Production Rate (MBF/yr)=====>>	164114	Emissions	164114	2015	2014	2-yr Avg	Increase 164114				
	PM	0.022	lb/MBF	Waximum Floudction rate (WDF/yr)/	1.81		1.81	0	0	0	1.81				
New	PM <sub>10</sub>		Ib/MBF	North Carolina Emissions Estimation Spreadsheet Woodwork (Lumber	1.81		1.81				1.81				
2-Steam CDKs			Ib/MBF	Kilns) PM10 and PM2.5 assumed equal to PM	1.81		1.81								
2 Steam Cons	PM <sub>2.5</sub>										1.81				
	VOC	4.43	lb/MBF	Selected BACT   Projected Heat Input (MMBtu/yr)=====>>	363.51 <b>788,937</b>	84,040	363.51 <b>704,897</b>	480,230	593,858	537,044	363.51 <b>167,853</b>				
				Projected Reat Input (MINDLU/yI)====>>		51,264	429,987	292,941	362,254	327,597	102,390				
	PM	0.275	lb/MMBtu	Average of Boiler Tests 2016, 2018 & 2020	108.35	13.82	94.52		97.69	88.34	6.18				
			Ib/MMBtu		105.30	13.29	92.01	75.00	93.95	84.96					
	PM <sub>10</sub>		-	91% of PM + 0.017 lb-CPM/MMBtu											
	PM <sub>2.5</sub>		lb/MMBtu	54% of PM + 0.017 lb-CPM/MMBtu	65.21	8.18	57.03	46.74	57.80	52.27	4.76				
AA-002	VOC		Ib/MMBtu	-	4.09	0.14	3.95	0.41	0.68	0.55	3.40				
Boiler	SO2		lb/MMBtu	Average of Boiler Tests 2016, 2018 & 2020	1.75	0.10	1.65	0.41	0.68	0.55	1.11				
	Nox		lb/MMBtu	-	77.84	9.25	68.59		65.38	55.26					
	CO Lead		Ib/MMBtu Ib/MMBtu	AP-42	80.21 0.02	2.37 0.00	77.84 0.02	55.71 0.01	16.75 0.01	36.23 0.01	41.61 0.00				
	CO2e		Ib/MMBtu	AP-42 AP-42 & Part 98	78656.59	8378.71	70277.89	47878.73	59207.39	53543.06					
	COZE	1.331102	ID/ WIIVIDLU	Projected Gross Production Rate (MBF)=====>>	187,500	6376.71	187,500	27,428	25,867	26,648	160,852				
	PM	0.001	lb/BDT	110jected G1033110ddetioi11dde (WBI)======	0.00		0.00	0.15	0.33	0.24	-0.24				
AA-001 Woodwaste	PM <sub>10</sub>	0.000995		1	0.00		0.00	0.15	0.33	0.24	-0.24				
Handling System with	PM <sub>2.5</sub>	0.00099	0.00099 lb/BDT Source to be removed.		0.00		0.00	0.15	0.33	0.24	-0.24				
1 Baghouse and Cyclone	VOC	0.12	lb/BDT		0.00		0.00	0.00	0.00	0.00	0.00				
.,	PM	0.20	lb/BDT	EPA Memo "Particulate Matter Potential to Emit Emission Factors for	3.67		3.67				3.67				
AA-001 New Planer	PM <sub>10</sub>	0.19	lb/BDT	Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest	3.53		3.53				3.53				
Cyclone	PM <sub>2.5</sub>	0.16	lb/BDT	Indian Country" for high efficiency cyclone.	2.97		2.97				2.97				
	VOC	0.12	lb/BDT	Weyerhaeuser Philadelphia Application	2.36		2.36				2.36				
	PM				2.91		2.91	1.34	0.72	1.03	1.87				
AA-006 Sawmill Fugitives	-			Calculations Worksheet	1.45		1.45	0.67	0.36	0.52	0.93				
744 000 Suwmin rugicives				carcarations from the control of the											
	PM <sub>2.5</sub>				0.71		0.71	0.33	0.18	0.26	0.46				
	PM				5.93		5.93	1.45	1.43	1.44	4.48				
AA-007 Roads	PM <sub>10</sub>			Calculations Worksheet	1.38		1.38		0.33	0.34	1.04				
AA-009	PM <sub>2.5</sub>				0.18		0.18	0.04	0.04	0.04	0.14				
Lumber Treatment  AA-010	VOC			Source to be removed.	0.00		0.00	9.16	11.00	10.08	-10.08				
End Coating	VOC			Source to be removed.	0.00		0.00		0.08	3.25	-3.25				
	T	1		Production Rate (BDT)====>>			166,125	17,958	30,751	24,354	141,771				
	PM	0.00075		EPA Memo "Particulate Matter Potential to Emit Emission Factors for	0.06		0.06	0.01	0.01	0.01					
AA-013 Truck Loadout	PM <sub>10</sub>	0.00035		Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest	0.03		0.03	0.00	0.01	0.00		<b></b>			
	PM <sub>2.5</sub>	0.00005	lb/BDT	Indian Country" drop of wet material.	0.00		0.00	0.00	0.00	0.00		PSD SER	PSD Review		
				PM	122.72	13.82	108.89		100.19	91.07	17.82	25	N		
				PM <sub>10</sub>	113.49	13.29	100.20	77.14	94.98	86.06	14.14	15	N		
				PM <sub>2.5</sub>	70.89	8.18	62.71	47.27	58.35	52.81	9.90	10	N		
				VOC	369.96	0.14	369.82	15.99	11.76	13.87	355.95	40	Υ		
	Totals	5		SO2	1.75	0.10	1.65	0.41	0.68	0.55	1.11	40	N		
				Nox	77.84	9.25	68.59	45.14	65.38	55.26	13.33				
				СО		2.37			16.75	36.23		100	N		
				Lead		0.00			0.01	0.01			N		
				CO2e	78,657	8,379	70,278	47,879	59,207	53,543	16,735	75000	N		

## Appendix A

Mississippi Consolidated Air Application

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

rU.	KIVI	a MIDE	- QUAL	III AI		ONTROL PI		rollution
Fac	ility	(Agency Intere	st) Informa	tion				Section A
1.		ne, Address, and						
	A.	Owner/Company Na	me: Vicksbur	rg Fores	st Pro	oducts, LLC		
	B.	Facility Name (if diff	erent than A. abo	ove): -		ksburg Fores Itersville Lun		LLC,
	C.	Facility Air Permit N	o. (if known):	2780-	000	04		
	D.	Agency Interest No.	(if known):	1536				
	E.	· —	icksburg arren		3. 5. 7.	State: Zip Code:	MS 39183	
	F.		or P.O. Box:icksburg			4. Zip (	Code: <u>3</u>	9182
	G.	☐ GPS ☐ Map Inte  3. Latitude (degree	nt <i>(check one)</i> : crance	rdinate s le Earth nds):	, etc 32	2°22'50.00"N °52'4.19"W	other:	
	Н.	SIC/NAICS Codes (p SIC: 2421 NAICS: 321113 (NAICS Code should	correspond with	the SIC	-	de directly al	 	
2.	Nai	ne and Address of	f Facility Con	tact				
	A. B.	4. Zip Code: 39	or P.O. Box: _ icksburg 0182	821338 	3. 5.		nett@vicks	burgfp.com
		6. Telephone No.	: 601-429-644	13	7.	Fax No.:	(601)629	-3626

FOR	2M 5	MDEQ			FOR AIR POLLUTION
Facil	ity (	(Agency Interest)		TROLI	Section A
<b>3.</b> I	Nam	e and Address of Ai	r Contact <i>(if different</i>	t from Fa	acility Contact)
A	4. N	Name:	T:	itle:	
I	3. N	Mailing Address  1. Street Address or P  2. City:  4. Zip Code:  6. Telephone No.:	3. S 5. E	State: Email: Fax No.: _	
<b>4.</b> I	Nam	e and Address of the	Responsible Official	l for the	Facility
		esponsible Official is define		1101 0110	
	b. H c. H oo	charge of a principal busine lecision-making functions for the representative is respondention, or operating factorial decord quarter 1980 dollars accordance with corporate per a municipality, state, for a municipality, state, for a principal geographic universely a principal geographic universely of a militant executive officer of a militant executive of the executi	ensible for the overall operate ilities applying for or subjective gross annual sales or expension, if authority to sign docume procedures. The procedures are general partederal, or other public agency purposes of these regulation of the agency (e.g., a Regulation) of the agency (e.g., a Regulation)	rson who pe v authorized tion of one o ct to a perm ependitures o nents has be tiner or the p ty: either a p ons, a princi ng responsi- ty command	erforms similar policy or d representative of such person or more manufacturing, nit and the facilities employ exceeding \$25 million (in een assigned or delegated in proprietor, respectively, principal executive officer or eipal executive officer of a libility for the overall operations inistrator of EPA). A principal der, chief executive officer, or
A	4. N	Name: William J Van	n Devender Jr Ti	itle: Assi	istant Manager
Ι	3. N	Mailing Address  1. Street Address or P			
		2. City: Jackso	<u>n</u> 3. S	State: N	MS
		4. Zip Code: <u>39296</u>	5. E	Email: v	william@claw-forestry.com
		6. Telephone No.:	7. F	Fax No.: _	
(	a	and not a corporate office f yes, has written notification	ution of such authorization	n been subr	Yes No No mitted to MDEQ? ation is attached

### MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL **MDEQ** FORM 5 **OUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT Facility (Agency Interest) Information** Section A Type of Permit Application (Check all that apply) State Permit to Construct (i.e., non-PSD or PSD avoidance) **Initial Application** Modification New Source Review (NSR) Permit to Construct (includes both Prevention of Significant **Deterioration (PSD) and Nonattainment)** $\boxtimes$ **Initial Application** Modification **Title V Operating Permit Initial Application** Re-issuance: Are any modifications to the permit/facility being Yes No requested? (If yes, provide a separate sheet identifying the modification(s) and resulting change to emissions.) Modification (*Specify type*): ☐ Significant ☐ Minor ☐ Administrative Synthetic Minor Operating Permit (Appendix B must be completed and attached.) ☐ Initial Application Re-issuance: Are any modifications to the permit/facility being Yes No requested? If yes, address such on a separate sheet. ☐ Modification State Permit to Operate a Significant Minor Source (defined in 11 Miss. Admin. Code Pt. 2, R.2.1.C(25).☐ Initial Application Re-issuance: Are any modifications to the permit/facility being Yes No requested? If yes, address such on a separate sheet. ☐ Modification **True Minor Determination** Uncontrolled potential to emit air pollutants is below the Title V thresholds **Process/Product Details 6.** List Significant Raw Materials (if applicable): A. Pine Logs List All Products (if applicable): Dimensional Lumber В. Brief Description of Principal Process(es): C. Sawmill, Kiln Drying and Lumber Planing

FORM 5

**MDEQ** 

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

## **Facility (Agency Interest) Information**

**Section A** 

- 6. Process/Product Details (continued)
  - D. Maximum Throughput for Raw Material(s) (if applicable):

Raw Material	Throughput	Units
Pine Logs	830,625	Tons/yr

E. Maximum Throughput for Principal Product(s) (if applicable):

Maximum Throagnput for Thr	101   0.1 1 1 0 0.00 0 0 (0) (0) 0.	ppiretiere
Product	Throughput	Units
Dimensional Lumber	187.5	MMBF/yr

## 7. Facility Operating Information

A.F Number of employees at the facility: 125

B.	Hours per day the facility will operate:	Average Actual	Maximum Potential 24
C.	Days per week the facility will operate:	5	7
D.	Weeks per year the facility will operate:	50	52
Ε.	Months the facility will operate:	12	12

## 8. Maps

- A. Attach a topographical map of the area extending to at least ½ mile beyond the property boundaries. The map must show the outline of the property boundaries.
- B. Attach a site map/diagram showing the outline of the property, an outline of all buildings and roadways on the site, and the location of each significant air emission source.

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

Facility (Agency Interest) Informa	acility (.	Agency	Interest	) information
------------------------------------	------------	--------	----------	---------------

Section A

Λ		•
9.	7.0	ning
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- A. Is the facility (either existing or proposed) located in accordance with any applicable city and/or county zoning ordinances? If no, please explain.

  Yes
- B. Is the facility (either existing or proposed) required to obtain any zoning variance to locate/expand the facility at this site? If yes, please explain.

  No

### 10. Risk Management Plan

Date submitted:

- A. Is the facility required to develop and register a risk management plan pursuant to Section 112(r), regulated under 40 CFR Part 68?
  B. If yes, to whom was the plan submitted?
- 11. Is confidential information being submitted with this application?

Yes No

If so, please follow the procedures outlined in the Mississippi Code Ann. Sections 49-17-39 and 17-17-27(6), as outlined in MCEQ-2 – "Regulation regarding the review and reproduction of public records".

## 12. MS Secretary of State Registration / Certificate of Good Standing

No permit will be issued to a company that is not authorized to conduct business in Mississippi. If the company applying for the permit is a corporation, limited liability company, a partnership or a business trust, the application package should include proof of registration with the Mississippi Secretary of State and/or a copy of the company's Certificate of Good Standing. The name listed on the permit will include the company name as it is registered with the Mississippi Secretary of State.

It should be noted that for an application submitted in accordance with 11 Miss. Admin. Code Pt. 2, R. 2.8.B. to renew a State Permit to Operate or in accordance with 11 Miss. Admin. Code Pt. 2, R. 6.2.A(1)(c). to renew a Title V Permit to be considered timely and complete, the applicant shall be registered and in good standing with the Mississippi Secretary of State to conduct business in Mississippi.

FORM 5

**MDEQ** 

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

## **Facility (Agency Interest) Information**

Section A

13. Certification

Note: If approved by MDEQ, a duly authorized representative (DAR) may sign the air permit application. The DAR must be listed in Section 4 of this application.

I certify that to the best of my knowledge and belief formed after reasonable inquiry, the statements and information in this application are true, complete, and accurate, and that as a responsible official, my signature shall constitute an agreement that the applicant assumes the responsibility for any alteration, additions, or changes in operation that may be necessary to achieve and maintain compliance with all applicable Rules and Regulations. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature of Responsible Official/DAR

Assistant Manager

Title

FORM 5

**MDEQ** 

### MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL **QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT**

## **Facility (Agency Interest) Information**

**Section A** 

#### **Required Sections 14.**

For the sections below, indicate the number that have been completed for each section as part of the application.

Section A 1	Section L1	Section M5
Section B 1	Section L2 1	Section M6
Section C1	Section L3	Section M7
Section D	Section L4	Section M8
Section E3	Section L5	Section M9
Section F	Section L6	Section M10
Section G	Section L7	Section N1
Section H	Section M1	Appendix A
Section I	Section M2	Appendix B
Section J	Section M3	Appendix C
Section K	Section M4	

The following permit applications must contain the specified sections, at a minimum, to be considered administratively complete.

Permit Type	Section Appendix							
	A	В	M	N	A	В	C	
State Permit to Construct	X	X		X				
New Source Review (PSD)	X	X		X			X	
Permit								
Title V Operating Permit	X	X	X	X	X			
Synthetic Minor Operating	X	X	X	X		X		
Permit								
State Permit to Operate	X	X	X	X				
True Minor Determination	X	X						

#### Section B.1: Maximum Uncontrolled Emissions (under normal operating conditions)

Maximum Uncontrolled Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) in Section B.3 and GHGs in Section B.4. Emission Point numbering must be consistent throughout the application package and, for existing emission points, should match any MDEQ ID's in the current permit. Fill all cells in this table with the emission numbers or a "-" symbol indicates that emissions of this pollutant are not expected. Emissions > 0.01 TPY must be included. Please do not change the column widths on this table.

Emission	P	М	PN	110	PM	12.5	SC	$O_2$	N	Ox	C	0	V	ОС	TI	$RS^2$	Le	ead	Total	HAPs
Point ID	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
DPK-1	0.22	1.80558	0.22	1.80558	0.22	1.80558	-	-	-	-	-	-	44.62	363.579	-	-	-	-	2.5583	20.8463
DPK-2	0.22	1.80558	0.22	1.80558	0.22	1.80558	-	-	-	-	-	-	44.62	363.579	-	-	-	-	2.5583	20.8463
AK-1 to 28	0.06	0.26	0.06	0.26	0.06	0.26	-	-	-	-	-	-	11.83	51.80	-	-	-	-	0.6781	2.9700
AA-001	0.85	3.71	0.80	3.53	0.68	2.97	-	-	-	-	1	-	0.51	2.23	-	-	-	-	-	-
AA-002	27.03	118.38	26.27	115.05	16.27	71.25	0.44	1.91	19.42	85.05	20.01	87.64	1.02	4.47	-	-	0.00	0.02	2.30843	9.25408
AA-006	0.66	2.91	0.33	1.45	0.16	0.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AA-007	1.78	5.93	0.42	1.38	0.05	0.18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AA-013	0.02	0.11	0.01	0.05	0.00	0.01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Totals	30.84	134.90	28.33	125.33	17.66	78.99	0.44	1.91	19.42	85.05	20.01	87.64	102.59	785.65	0.00	0.00	0.00	0.02	8.10309	53.9167

<sup>&</sup>lt;sup>1</sup> Condensables: Include condensable particulate matter emissions in particulate matter calculations for PM-10 and PM-2.5, but not for TSP (PM).

<sup>&</sup>lt;sup>2</sup> **TRS:** Total reduced sulfur (TRS) is the sum of the sulfur compounds hydrogen sulfide (H<sub>2</sub>S), methyl mercaptan (CH<sub>4</sub>S), dimethyl sulfide (C<sub>2</sub>H<sub>6</sub>S), and dimethyl disulfide (C<sub>2</sub>H<sub>6</sub>S<sub>2</sub>).

### **Section B.2: Proposed Allowable Emissions**

Proposed Allowable Emissions (Potential to Emit) are those emissions the facility is currently permitted to emit as limited by a specific permit requirement or federal/state standard (e.g., a MACT standard); or the emission rate at which the facility proposes to emit considering emissions control devices, restrictions to operating rates/hours, or other requested permit limits that reduce the maximum emission rates. Emission Point numbering must be consistent throughout the application package and, for existing emission points, should match any MDEQ ID's in the current permit. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Additional columns may be added if there are regulated pollutants (other than HAPs and GHGs) emitted at the facility.

Emission Emission	TS		PM		PM		S		-	Ox	C	0	V	OC	Tì	RS	Le	ead
Point ID	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr										
DPK-1	0.22	1.81	0.22	1.81	0.22	1.81	-	-	-	-	-	-	44.62	363.58	-	-	-	-
DPK-2	0.22	1.81	0.22	1.81	0.22	1.81	-	-	-	-	-	-	44.62	363.58	-	-	-	-
AK-1 to 28	0.06	0.26	0.06	0.26	0.06	0.26	-	-	-	-	-	-	11.83	51.80	-	-	-	-
AA-001	0.85	3.71	0.80	3.53	0.68	2.97	-	-	-	-	-	-	0.51	2.23	-	-	-	-
AA-002	27.03	108.35	26.27	105.30	16.27	65.21	0.44	1.91	19.42	85.05	20.01	87.64	1.02	4.47	-	-	0.0047	0.0207
AA-006	0.66	2.91	0.33	1.45	0.16	0.71	-	-	-	-	-	-	-	-	-	-	-	-
AA-007	1.78	5.93	0.42	1.38	0.05	0.18	-	-	-	-	-	-	-	-	-	-	-	-
AA-013	0.02	0.11	0.01	0.05	0.00	0.01	-	-	-	-	-	-	-	-	-	-	-	-
Totals	30.84	124.87	28.33	115.58	17.66	72.96	0.44	1.91	19.42	85.05	20.01	87.64	102.59	785.65			0.0047	0.0207

<sup>&</sup>lt;sup>1</sup>Condensables: Include condensable particulate matter emissions in particulate matter calculations for PM-10 and PM-2.5, but not for TSP (PM).

<sup>&</sup>lt;sup>2</sup> **TRS:** Total reduced sulfur (TRS) is the sum of the sulfur compounds hydrogen sulfide (H<sub>2</sub>S), methyl mercaptan (CH<sub>4</sub>S), dimethyl sulfide (C<sub>2</sub>H<sub>6</sub>S), and dimethyl disulfide (C<sub>2</sub>H<sub>6</sub>S<sub>2</sub>).

### Section B.3: Proposed Allowable Hazardous Air Pollutants (HAPs)

In the table below, report the Proposed Allowable Emissions (Potential to Emit) for each HAP from each regulated emission unit if the HAP > 0.0001 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources. Use the HAP nomenclature as it appears in the Instructions. Emission Point numbering must be consistent throughout the application package and, for existing emission points, should match any MDEQ ID's in the current permit. For each HAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above. Additional columns may be added as necessary to address each HAP.

Emission Point ID	Total	HAPs	Acetalo	dehyde	Acre	olein	Formal	dehyde	Metl	nanol	Pho	enol	Propion	aldehyde		Pollutant e Here		Pollutant e Here
1 OIIIt 1D	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
DPK-1	2.55829	20.8463	0.4029	3.2829	0.0403	0.3283	0.1612	1.3132	1.8130	14.7730	0.1007	0.8207	0.0403	0.3283				
DPK-2	2.55829	20.8463	0.40288	3.2829	0.0403	0.3283	0.1612	1.3132	1.8130	14.7730	0.1007	0.8207	0.0403	0.3283				
AK-1 to 28	0.67809	2.97002	0.1068	0.4677	0.0107	0.0468	0.0427	0.1871	0.4805	2.1047	0.0267	0.1169	0.0107	0.0468				
AA-002	2.30843	9.25408	0.0817	0.3274	0.3936	1.5779	0.4330	1.7357	0.0000	0.0000	0.0050	0.0201	0.0060	0.0241				
Totals:																		

#### **Section B.4: Greenhouse Gas Emissions**

Applicants must report potential emission rates in SHORT TONS per year, as opposed to metric tons required by Part 98. Emission Point numbering must be consistent throughout the application package and, for existing emission points, should match any MDEQ ID's in the current permit.

		CO <sub>2</sub> (non- biogenic) ton/yr	CO <sub>2</sub> (biogenic) <sup>2</sup> ton/yr	N <sub>2</sub> O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC <sup>3</sup> ton/yr			Total GHG Mass Basis ton/yr <sup>5</sup>	Total CO <sub>2</sub> e ton/yr <sup>6</sup>
Emission Point ID	GWPs 1	1	1	298	25	22,800	footnote 4				
AA-002	mass GHG		76,921	5.13	8.28					76,935	
AA-002	CO <sub>2</sub> e		76,921	1,528.17	207.10						78,657
	mass GHG										
	CO <sub>2</sub> e										
	mass GHG										
	CO <sub>2</sub> e										
	mass GHG										
	CO <sub>2</sub> e										
	mass GHG										
	CO <sub>2</sub> e										
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	mass GHG										
	CO <sub>2</sub> e										
	mass GHG										
	CO <sub>2</sub> e										
	mass GHG										
	CO2e										
	mass GHG										
	CO <sub>2</sub> e										
FACILITY	mass GHG									76,935	
TOTAL	CO <sub>2</sub> e										78,657

<sup>&</sup>lt;sup>1</sup> **GWP** (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

<sup>&</sup>lt;sup>2</sup> Biogenic CO2 is defined as carbon dioxide emissions resulting from the combustion or decomposition of non-fossilized and biodegradable organic material originating from plants, animals, or micro-organisms.

<sup>&</sup>lt;sup>3</sup> For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

<sup>&</sup>lt;sup>4</sup> For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

<sup>&</sup>lt;sup>5</sup> Greenhouse gas emissions on a mass basis is the ton per year greenhouse gas emission before adjustment with its GWP. Do not include biogenic CO<sub>2</sub> in this total.

<sup>&</sup>lt;sup>6</sup> CO<sub>2</sub>e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the greenhouse gas by its GWP. Do not include biogenic CO<sub>2</sub>e in this total.

#### **Section B.5: Stack Parameters and Exit Conditions**

Emission Point numbering must be consistent throughout the application package and, for existing emission points, should match any MDEQ ID's in the current permit.

Emission Point ID	Orientation (H-Horizontal	Rain Caps	Height Above Ground	Base Elevation	Exit Temp.	Inside Diameter or Dimensions	Velocity	Moisture by Volume		ic Position utes/seconds)
Point ID	V=Vertical)	(Yes or No)	(ft)	(ft)	(°F)	(ft)	(ft/sec)	(%)	Latitude	Longitude
AA-001			TBD	~101	Ambient	TBD	TBD			
AA-002	V	No	50	~101	450	4	65	20	32°22'56.00"N	90°52'6.07"W
DPK-1a	V	No	30	~101	120	2.33	47	~10%	32°23'6.72"N	90°52'4.10"W
DPK-1b	V	No	30	~101	120	2.33	47	~10%	32°23'7.76"N	90°52'6.15"W
DPK-2a	V	No	30	~101	120	2.33	47	~10%	32°23'7.88"N	90°52'3.82"W
DPK-2b	V	No	30	~101	120	2.33	47	~10%	32°23'8.92"N	90°52'5.86"W

<sup>&</sup>lt;sup>1</sup> A WAAS-capable GPS receiver should be used and in the WGS84 or NAD83 coordinate system.

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION

				CONTR	OL PERMIT	
el Bu	rning E	Equipment –	External Co	mbustion	Sources	<b>Section C</b>
Em	ission Po	int Description	n			
A.	Emission P	oint Designation (Re	f. No.): <u>AA-001</u>			
B.	Equipment	Description: Wo	od Fired Boiler			
C.	Manufactur	er: Wellons	D.	Model Yr. and	No.:	
E.	Maximum language (higher hear	Heat Input ting value): 98	.4 MMBtu/hr		Nominal Heat nput Capacity: _	98.4 MMBtu/hr
G.	For units su	bject to NSPS Db, is	the heat release rate	> 70,000 Btu/h	r-ft <sup>3</sup> ?	☐ Yes ☐ No
Н.	Use:	☐ Electrical G	eneration $\triangleright$	Steam	Proc	ess Heat
	Spac	e Heat S	Standby/Emergency	Other	(describe):	
I.	Heat Mecha	anism:	Direct	Indirect		
J.		be (e.g., pulverized cooli, low- $NO_x$ , etc.):		el Cell		
K.	Additional	Design Controls (e.g.	, FGR, etc.):			
L.	Status:	Operating	Propos	sed	Under Construc	etion
M.		astruction, reconstructurces) or date of antic	tion, or most recent mipated construction:	odification (for	r 	
Fue	el Type					
Com	plete the follo		ng each type of fuel a	nd the amount	used. Specify the	units for heat content,
	EL TYPE <sup>1</sup>	yearly usage. HEAT CONTENT	% SULFUR	% ASH	MAXIMUM HOURLY USAGE	MAXIMUM YEARLY USAGE
Wo	od Residue	4350 btu/lb	<0.03%	<0.01%	98.4 MMBtu	788,303 MMBtu
Dleas	e list any fue	components that are	 	ants and the ne	reentage in the fire	
	—	r components that are	nazardous an ponda	ants and the per	reentage in the rue	
1 <b>D</b> oi	lara humina	solid wests may be a	ongidarad "galid wagt	inainaratara"	for numases of co	malying with
			onsidered "solid waste only required to comp			
		sted are indicated in t				Č

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# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

<b>Manufacturing</b>	<b>Processes</b>
----------------------	------------------

**Emission Point Description** 

**Section E** 

A.	Emission Point Designation (Ref.: No.): AA-006
В.	Process Description: <u>Sawmill Fugitive emissions including debarking, hogging of bark/chips, and mechanical handling of wood residuals</u>

C.	Manufacturer:	Custom	D. Model:

E.	Max. Design Capacity (specify units):	250 tons/hr	
	Equivalent to:		tons/hr

F.	Status:	$\boxtimes$	Operating	Proposed	Under Construction
1.	Dialus.		Operaning	Troposed	Officer Constructi

G.	Operating Schedule (Actual):	18	hrs/day	5	_ days/week	50	weeks/yr
----	------------------------------	----	---------	---	-------------	----	----------

H.	Date of construction, reconstruction, or most recent modification
	(for existing sources) or date of anticipated construction:

## 2. Raw Material Input

MATERIAL	QUANTITY/HR	QUANITITY/HR	QUANTITY/YEAR
	AVERAGE	MAXIMUM	MAXIMUM
Pine Logs	177 TPH	265 TPH	830,625 tons

## 3. Product Output

MATERIAL	QUANTITY/HR	QUANITITY/HR	QUANTITY/YEAR
	AVERAGE	MAXIMUM	MAXIMUM
Green Lumber	40 MBF	60 MBF	187.5 MMBF
Chips	50.4 TPH	75.4 TPH	236,313 tons
Bark	17.7 TPH	26.5 TPH	83,063 tons
Sawdust	16 TPH	23.8 TPH	66,450 tons

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

				CONTROL PI	LKWILL	
Ma	nuf	acturing P	rocesses			Section E
1.	Em	ission Point	Description			
	A. B.		nt Designation (Ref.: N	o.): DPK-1 & DPK-2		
	C. E.	Manufacturer Max. Design	Capacity (specify units)	D. Model:  1: 20.144 MBF/hr (combine): ~40 to	Custon ned) ons/hr	n
	F.	Status:	Operating Pro	pposed U	Inder Constru	ıction
	G.	Operating Sche	edule (Actual): 24	hrs/day7 da	ys/week	52 weeks/yr
	Н.		uction, reconstruction, or urces) or date of anticipat			
2.	Ra	w Material I	nput			
		MATERIAL en Lumber	QUANTITY/HR AVERAGE 18.7 MBF	QUANITITY/HR MAXIMUM 20.144 MBF	QUANTIT MAXI 164,114	MUM
3.	Dru	oduct Outpu	4			
<b>J.</b>	rr(		l			
		MATERIAL	QUANTITY/HR AVERAGE	QUANITITY/HR MAXIMUM	QUANTIT MAXI	MUM
	Drie	ed Lumber	18.7 MBF	20.144 MBF	164,114	4 MBF

### MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION **CONTROL PERMIT**

<b>Manufacturing Processes</b>					
1.	<b>Emission Point Description</b>				

**Section E** 

A.	Emission Point Designation (Ref.: No.):	AA-001 – Planer Cyclone	

Process Description: <u>Lumber Planer with pneumatic transfer system w/ cyclone</u>

<b>C</b> .	Manufacturer:	Custom	D. Model:

E.	Max. Design Capacity (specify units):	60.175 MBF/hr	
	Equivalent to:	~74	tons/hr

F.	Status:	$\boxtimes$	Operating	Proposed	Under Construction
1.	Status.		Operating	Troposed	Chaci Construction

G.	Operating Schedule (Actual):	18	hrs/day	5	_ days/week	50	weeks/yr
----	------------------------------	----	---------	---	-------------	----	----------

H.	Date of construction, reconstruction, or most recent modification
	(for existing sources) or date of anticipated construction:

#### **Raw Material Input** 2.

MATERIAL	QUANTITY/HR	QUANITITY/HR	QUANTITY/YEAR
	AVERAGE	MAXIMUM	MAXIMUM
Kiln Dried Lumber	41.6 MBF	62.7 MBF	187.5 MMBF

#### **Product Output 3.**

MATERIAL	QUANTITY/HR	QUANITITY/HR	QUANTITY/YEAR
	AVERAGE	MAXIMUM	MAXIMUM
Finished Lumber	40 MBF	60.175 MBF	180 MMBF
Planer Shavings	8.19 TPH	10.86 TPH	36,850 TPY
Hogged Material	1.12 TPH	1.84 TPH	5,248 TPY
Sawdust	0.13 TPH	0.21 TPH	576 TPY

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# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

Cyc	clone	es	Section L2
1.	Cy	clone Description	
	A. B.	Emission Point Designation (Ref. No.):  AA-001  Equipment Description (include the process(es) that the cyclone(s) controls em	issions from):
	C. E.	Manufacturer:	ion
2.		clone Data	IOII
	Α.	Cyclone Type:	
		Conventional X High Efficiency Multiclone Other	r:
	B.	Efficiency (PM): *	poise
	D.	Pressure Drop: in. H <sub>2</sub> O E. Inlet air flow rate:	acfm
	F.	Pollutant particle diameter: microns G. Baffles/Louvers?	☐ Yes ☐ No
	Н.	Cyclone Dimensions:	
		1. Inlet height:ft2. Inlet width:3. Cylinder diameter:ft4. Cylinder heigh5. Cone height:ft6. Outlet pipe dia7. Dust exit diameter:ft	
	I.	Is wet spray used?	
		1. No. of nozzles:	
	J.	Fan Location: Downstream (direct emissions) Downstream (au	xiliary stack)
		<ul> <li>□ Upstream (no cap/vertical emissions)</li> <li>□ Upstream (fixed cap/diffuse emissions)</li> <li>□ Upstream (wind respondent cap/horizontal emissions)</li> </ul>	issions)
	K.	How is the collected dust stored, handled, and disposed of?	

<sup>\*</sup>Emissions based on EPA Technical Memoranda for Sawmills

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

### **Applicable Requirements and Status**

**Section N** 

1.	<b>Summary</b>	of Ani	olicable	Red	uirements
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Provide a list of all applicable federal standards for which your facility is or will be subject to, as well as a list of all Construction Permits establishing limits or restrictions issued to your facility. The specific emission standards and limitations applicable to each emission point shall be provided on the following pages (Parts 2 and 3).

### **Federal Regulations:**

40 CFR Part	52.21	Subpart				
	61	•	M			
	63		DDDD			
	63		DDDDD			
C4-4- C4	-4: D	_1.				
State Constru	ction Permit		v + + + ?	Dab	DGD 4 11 3	0.1
		MM/DD/		PSD	PSD Avoidance <sup>3</sup>	Other
Permit to Cons	struct issued:					
		9/17/1999	9			
		10/3/2018	8			
				ΠĪ	$\Box$	

<sup>&</sup>lt;sup>1</sup> Any Construction Permits containing requirements that are currently applicable to the facility should be addressed in this section.

<sup>&</sup>lt;sup>2</sup> If the permit has been modified, give the most recent modification date.

<sup>&</sup>lt;sup>3</sup> Because permits are issued on a pollutant-by-pollutant basis, a PSD permit may be significant for one pollutant while also containing PSD avoidance limits for another pollutant. Therefore, you may check multiple boxes for each permit.

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

## **Applicable Requirements and Status**

**Section N** 

### 2. Current Applicable Requirements

List all applicable state and federal requirements, including emission limits, operating restrictions, etc., and the applicable test methods or monitoring used to demonstrate compliance with each applicable requirement. Clearly identify federal regulations from state requirements. Provide the compliance status as of the day the application is signed.

EMISSION POINT NO.	APPLICABLE REQUIREMENT (Regulatory citation)	POLLUTANT	LIMITS/ REQUIREMENTS	TEST METHOD/ COMPLIANCE MONITORING	COMPLIANCE STATUS (In/Out) <sup>1,2</sup>
AA-100	PSD PtC 10/3/2018	HAPS	9.9 Individual 24.9 Total	Calculations based on throughput	In
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	Opacity	40%	Visible Observation	In
	11 Miss. Admin. Code Pt. 2, R.1.3.D.(2).	PM	0.3 gr/dscf	Stack Test	In
		PM	45.6 lb/hr, 199.7 tpy		In
	PtC Issued on May 24,	$NO_X$	30.0 lb/hr, 131.4 tpy	Cto als Toot	In
	1988 and Modified on	SO2	2.3 lb/hr, 10.1 tpy	Stack Test Track Steam Production	In
	September 17, 1999	CO	23.2 lb/hr, 101.6 tpy	Track Steam Floduction	In
		VOC	8 lb/hr, 36 tpy		In
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	SO2	4.8 lb/MMBtu Heat Input	Stack Test	In
	PtC Issued on October 3, 2018	Fuel	Uncontaminated Wood Waste	Process Knowledge	In
	40 CFR Part 63, Subpart JJJJJJ	HAPs	Applicability	Work Practice	In
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	Opacity	40%	Method 9/Weekly observations	In

<sup>&</sup>lt;sup>1</sup>Per APC-S-6, Section II.C.8.b(1) for Title V sources, by specifying that the source is in compliance with the applicable requirement(s), I (the applicant) am certifying that I will continue to operate and maintain this source to assure compliance for the duration of the permit term.

<sup>&</sup>lt;sup>2</sup> Per APC-S-6, Section II.C.8.b(3) for Title V sources, by specifying that the source is out of compliance with the applicable requirement(s), I (the applicant) am submitting a schedule, attached herein, which includes a description of the problems and proposed solutions in accordance with APC-S-6, Section II.C.8.c.

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

## **Applicable Requirements and Status**

**Section N** 

### 3. Future Applicable Requirements

List all future applicable state and federal requirements, including emission limits, operating restrictions, etc., and the applicable test methods or monitoring used to demonstrate compliance with each applicable requirement. Clearly identify federal regulations from state requirements.

EMISSION POINT NO.	FUTURE APPLICABLE REQUIREMENT (Regulation citation)	POLLUTANT	LIMITS/ REQUIREMENTS	TEST METHOD/ COMPLIANCE MONITORING	COMPLIANCE DATE <sup>1</sup>
DPK-1 & 2	PSD Construction Permit	VOC	4.43 lb/MBF	Work Practice Standards	Upon Issuance
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.B	Opacity	40%	Weekly Visual Observation Method 9 if visible	Upon Issuance
		PM	108.35 tpy	Stack Test Methods 5, 201a, 202	Upon Issuance
AA-002	PSD Construction Permit	$PM_{10}$	105.30 tpy	Determine EF as lb/Mlb Steam Track Steam Production	Upon Issuance
AA-002		PM <sub>2.5</sub>	65.21 tpy	Track emissions as EF x Steam Production	Upon Issuance
	40 CFR Part 63 Subpart DDDD	HAPs	Applicability	To be determined	3-yrs after beginning operation
AA-100	40 CFR Part 63 Subpart DDDDD	HAPs	Applicability	Initial Notification	Application Submittal

<sup>&</sup>lt;sup>1</sup> Per 11 Miss. Admin. Code Pt. 2, R. 6.2.C(8)(b)(2)., for Title V sources, for future applicable requirements which will become effective during the permit term, I (the applicant) am certifying that I will meet such requirements on a timely basis.

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

Last Revised: 5/5/2020

1014.70			IDEQ	CONTROL PERMIT					
Air	Qual	lity A	nalysis Che	cklist	<b>Appendix C</b>				
	BMIT								
Yes	N/A								
	Deteri	oration (	-	leted and included with the application for a F Construct. All elements of the checklist should a ther information.					
$\boxtimes$		I.	Applicant and (	Consultant Information					
			<ul><li>b. Facility Air</li><li>c. Chris Barne</li></ul>	ress, and location of facility Permit Number ett, Environmental Manager, (601) 429-6443 uson, (601) 824-1864, bferguson@fce-engineering	g.com				
$\boxtimes$		II.	Description of I	Facility Operations					
			used in the process explaining all stag to air pollution. C of air contaminant systems and the co	of each process to be carried out in the facility and the descriptions must be complete and particular es in the process where the discharge of any materic ontrol procedures must be described in sufficient destanticipated in the design, specifying the expected entrol devices. All obtainable data must be supplied ats, chemical composition and concentrations of all	r attention must be given to ials might contribute in any way etail to show the extent of control efficiencies of the capture l concerning the nature, volumes,				
$\boxtimes$		III.	<b>Project Descrip</b>	tion					
			project purpose an pollutants evaluate and shutdown ope	ion of the proposed project to include, but not limited scope, general geographical location, types of eed, applicable averaging periods, and any special rations, varying operational loads, operating restrell be included in the compliance demonstration mo	emission sources and scenarios, considerations (e.g., startup rictions, alternative operating				
	$\boxtimes$	IV.	<b>Modeling Proto</b>	col					
			modeling, the application review, the application and any of necessarily limit the applicable standard		o MDEQ for review. Upon nodeling approach as well as I modeling protocol does not				
			Submittal Date	: Approval Date:					

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

Last Revised: 5/5/2020

#### **CONTROL PERMIT** Air Quality Analysis Checklist **Appendix C SUBMIT** Yes N/A **Model Selection** $\Box$ $\boxtimes$ The Preferred/Recommended dispersion models are listed in 40 CFR 51Appendix W and are required to be used. All air quality analyses should be performed using the most currently available versions of EPA guideline models. Access to all current models is possible through the EPA Web Page http://www.epa.gov/scram/. Discuss the general modeling approach (e.g., project impacts vs. cumulative impacts) and highlight any unique items. b. Identify the dispersion model(s), including the version number that was used in the modeling Discuss modeling options used and why they were considered appropriate for the proposed c. project. d. List the time-averaged pollutants modeled. Discuss any other modeling parameters or considerations used in the modeling analysis. e. Alternative Model or Modeling Technique Any deviation from an EPA preferred air quality model or development of an alternative modeling technique is subject to the alternative modeling requirements of Appendix W – Guideline on Air Quality Models, Section 3.2. Appropriate justification for the proposed alternative model or modeling technique must be provided to the EPA Regional Office for consideration and approval with concurrence of the EPA Model Clearinghouse. XVI. Meteorological Data The meteorological data should be the most recent available and adequately representative. It may be site-specific data, data from a nearby National Weather Service (NWS) or comparable station, or prognostic meteorological data. The use of five (5) years of adequately representative NWS or comparable meteorological data, at least one (1) year of site-specific data, or at least three (3) years of prognostic meteorological data are required. If one (1) year or more (up to 5 years) of site-specific data are available, these data are preferred for use in air quality analyses, provided that the data meets quality-assurance requirements. The submittal must include a discussion of meteorological site representation based on recommendations in Appendix W, Guideline on Air Quality Models, Section 8.4.2(b). VII. Receptor and Terrain Discussion XReceptor grids may be polar, cartesian, or discrete with receptor placement along the property boundary of the land owned or controlled by the facility and precluded from access by the general public through physical barriers or other measures and extending sufficiently outward to identify the maximum impacts from both the onsite and offsite emission sources for each pollutant and pollutant averaging periods evaluated. Receptor resolution may vary; however, receptors near the facility fenceline and in the area of controlling concentrations must be no greater than 100-meters. Controlling concentrations are those receptors that indicate a predicted concentration greater than 90% of an applicable standard. The most recent version of AERMAP should be used to import terrain and source elevations.

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY APPLICATION FOR AIR POLLUTION CONTROL PERMIT

Last Revised: 5/5/2020

	CONTROL PERMIT					
Air Qua	lity A	nalysis Che	cklist	Appendix C		
		·				
SUBMIT						
Yes N/A						
	VIII.	<b>Emission Source</b>	e Information			
		including all applie exit velocity, exit to southwest coordinates, height a. Identify all identifiers at the associate should be usudelines.  c. Identify mathe associate the associate	ed for identifying all baseline and increment sout icable stack parameters (UTM coordinate locative temperature and inner diameter), area source parameters, height, width), and volume source parameters, horizontal and vertical dimensions). emission units included in the modeling analysis assigned to these sources for modeling purposes. Eximum potential short-term emission rates for alted g/sec emission rate. The maximum short-term is ed to demonstrate compliance with all short-term emission rates for alted g/sec emission rate. By operational limitation assumed for an emission rate of the properties of the grant parameters are the grant parameters.	ions, emission rate, stack height, arameters (emission rate, ters (emission rate, center).  S. Provide a listing of the ll modeled pollutants in lb/hr and m emission rates for each source rm averaging standards and l modeled pollutants in ton/yr and		
	137	N# 11: A 1				
	IX.	a. Significant  The preliminet increase analysis desconcentratis  Full Impact  b. Preconstruct	Included in application Impact Analysis inary analysis evaluates the potential increase in e in emissions associated with the modification. termines whether or not a full impact analysis is ions from the project are below the applicable Ps t Analysis is not required. etion Monitoring Analysis screening modeling analysis must address pre-co	The results of the preliminary required. If predicted SD Significant Impact Levels, a		
		requiremen	its for all proposed sources whose predicted amb inimis Impact Levels (to support ambient monitor	bient impact exceeds any of the		
		Standards ( source or so NAAQS and II and Clas. Review Woo	ct analysis consists of separate analysis for the N(NAAQS) and PSD Increments and will consider ource modification, any existing on-onsite source alysis, background concentrations. The full impass I Areas. Each of these topics are discussed in a rkshop Manual.  AQS Analysis Increment Analysis	emissions from the proposed es, off-site sources, and for the act analysis is conducted for Class		

FORM 5	MDEC	MISSISSIPPI DEPARTMEN QUALITY APPLICATION CONTROL	N FOR AIR POLLUTION
Air Qualit	y Analysis C		Appendix C
	<i></i>		11
SUBMIT			
Yes N/A			
	IX. Modeling A	Analysis (continued)	
		Discuss the impacts the proposed project will he industrial growth in the area, and on soils, vegethe proposed project location.  1. Vegetation and Soils Impact 2. Associated Growth Impact 3. Class I Area Impact Analysis  Comprised of the Class I Increment Analysis  (AQRV) Analysis. When a Class I AQRV  Parks Service (NPS) - Air Resources Div  FS - Air Quality Program have produced Land Managers' Air Quality Related Val  - Revised (2010). The guidance set forth review for Class I area impacts.	etation and visibility in the vicinity of Lysis and the Air Quality Related Valu Analysis is required, the National Prision, FWS - Air Quality Branch and If a guidance document entitled Federa Jues Workgroup (Flag) Phase I Repor
	Figures and r etc., should b a. The A	aps, Electronic Data, etc.  maps should be inserted with the narrative, when we referenced in the text and included in the appearing Quality Analysis should include or reference at Emission release locations Nearby buildings	endices.
	iv. v. vi. vii.	Property lines Fence lines Roads Coordinates (preferably UTM). If UTM coordin specified (e.g., NAD27 or NAD83) True North arrow Other pertinent items (as applicable)	nates are used, the datum should be
	b. The A showing	ir Quality Analysis Should include a topographiong:	c map and/or aerial photograph
	ii. iii. iv. v. vi. vii.	Source location Facility boundaries Terrain features Nearby buildings, roads, and adjacent facilities other major sources subject to PSD requirement NWS meteorological tower/observations (surfaction-site/local meteorological tower/observations) State/local/on-site air quality monitoring station Proceedings of the proceeding station of the construction manifesting site (if applicable)	ts ce and upper air) s (surface and upper air)

Pre-construction monitoring site (if applicable)

Provide an electronic file of the facility plot plans (e.g., GIS or other mapping file)

Last Revised: 5/5/2020

Nearby Class I Areas

c.

viii.

# MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL

Last Revised: 5/5/2020

FORM 5	MDEQ	QUALITY APPLICATION  CONTROL 1	FOR AIR POLLUTION
Air Quality	y Analysis Che	cklist	<b>Appendix C</b>
SUBMIT Yes N/A			
	X. Figures, Maps,	Electronic Data, etc. (continued)	
	d. Provide all	electronic modeling files, including:	
	prov. ii. Mod iii. BPIF iv. Mete	adme" textfile that describes the submitted fil ided in a compressed format. lel Input/Output files P Input/Output files corological data files processing programs and files (including spr	

## Appendix B

**Emissions Calculations** 

### **DPK-1 and DPK-2 Emissions Calculations per Kiln**

				Throughput	Potential I	Emissions
Pollutant	EF	Units	Ref	MBF/hr	lb/hr	TPY
PM	0.022				0.22	1.81
PM <sub>10</sub>	0.022	lb/MBF	1		0.22	1.81
PM <sub>2.5</sub>	0.022	ID/IVIDI			0.22	1.81
voc	4.43		2		44.62	363.58
HAPs						
Acetaldehyde	0.04			10.07	0.40	3.28
Acrolein	0.004				0.04	0.33
Formaldehyde	0.016	lb/MBF	3		0.16	1.31
Methanol	0.18	ID/IVIDI	]		1.81	14.77
Phenol	0.01				0.10	0.82
Propionaldehyde	0.004				0.04	0.33

#### References

North Carolina Dept. of Environmental Quality Emission Estimation Spreadsheets

https://files.nc.gov/ncdeq/Air%20Quality/permits/files/Lumber\_Kilns-Documentation.xls

#### **Calculation Methodology**

lb/hr = EF x Throughput

TPY = lb/hr x 8760 hr/yr x (ton/2000 lb)

#### **Notes**

Throughput based on 80,000 MBF/yr for each kiln and 8760 hour per year operation

<sup>1</sup> Lumber\_Kilns-Documentation (1).xls references

<sup>2</sup> Selected BACT

EPA Memo "Development of a Provisional Emissions Calculations Tool for Inclusion in the Final PCWP ICR".

Lumber Kiln: Indirectheated: Softwood: Pine Species

### **AK-001 to AK-028 Emissions Calculations**

				Throughput	Potential E	Emissions
Pollutant	EF	Units	Ref	MBF/yr	lb/hr	TPY
PM	0.022				0.06	0.26
PM <sub>10</sub>	0.022	lb/MBF	1	1		0.26
PM <sub>2.5</sub>	0.022	ID/IVIDI	ID/IVIBF		0.06	0.26
VOC	4.43		2	]	11.83	51.80
HAPs						
Acetaldehyde	0.04			23,386	0.11	0.47
Acrolein	0.004				0.01	0.05
Formaldehyde	0.016	lb/MBF	3		0.04	0.19
Methanol	0.18	ID/IVIDI	3		0.48	2.10
Phenol	0.01				0.03	0.12
Propionaldehyde	0.004				0.01	0.05

#### References

North Carolina Dept. of Environmental Quality Emission Estimation Spreadsheets

https://files.nc.gov/ncdeq/Air%20Quality/permits/files/Lumber\_Kilns-Documentation.xls

#### **Calculation Methodology**

 $\overline{\text{TPY}} = (\text{Annual Throughput}) \times \text{EF } \times (\text{ton/2000 lb})$ 

 $lb/hr = TPY \times 2000 lb/ton \times yr/8760 hrs$ 

Batch Kiln Throughput determined as Planer Capacity of 187.5 MMBF/yr less DPK capacity of 164 .114 MMBF/yr

<sup>1</sup> Lumber\_Kilns-Documentation (1).xls references

<sup>2</sup> Selected BACT

<sup>3</sup> EPA Memo "Development of a Provisional Emissions Calculations Tool for Inclusion in the Final PCWP ICR".

Lumber Kiln: Indirectheated: Softwood: Pine Species

#### AA-001 Planer Wood Shavings Handling System with Cyclone

#### Basis:

Pine Planer Residual Capacity									
Potential Pr	oduction	Residual C	Generation	Poten	tial				
187,500.00 MBF		0.20	BDT/MBF	37,107.83	BDT	12.8215			

			Trans	fer Rate		
Pollutant	Factor <sup>1</sup>	Units	BDT/hr	BDT/yr	lb/hr	TPY
PM	0.2	lb/BDT	11.90914	37,107.83	2.381828	3.71
PM <sub>10</sub>	0.19	lb/BDT	11.90914	37,107.83	2.262736	3.53
PM <sub>2.5</sub>	0.16	lb/BDT	11.90914	37,107.83	1.905462	2.97
VOC <sup>2</sup>	0.12	lb/BDT	11.90914	37,107.83	1.429097	2.23

PM Emission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission

Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country"

Pneumatically convey material through cyclone to bin. Exhaust routed through baghouse. The "material" in this entry refers to bark, hogged fuel, green chips, dry chips, green sawdust, dry sawdust, shavings and any other woody by-dry sawdust, shavings and any other woody by-products

<sup>2</sup> VOC emission factor from Weyerhaeuser Philadelphia, MS application for pneumatic transfer of dry pine wood residuals

## **Accommodated Emissions (AA-002)**

11 MAC, Part 2, Chapter 2 Rule 2.6 B.(7) requires that units must be tested at capacity and is otherwise operating normally. In the event that a demonstration of compliance by testing is performed at less than capacity, the Permit Board may modify the permit to limit capacity of the stationary source to the rate at which compliance was demonstrated if the Permit Board determines the rate was not representative of the normal operation of the stationary source

The historical testing shown below illustrate that testing was performed at various rates over the years, presumably based on production swings. Additionally, the permit contained language allowing operation at 10% above the tested capacity before a retest would be required. Implying that the unit could accommodate up to 10% above the tested capacity. The accommodated emissions were determined assuming continuous operation at the tested capacity: (70.9 MMBtu/hr)x(8760 hr/yr) = 621,084 MMBtu/hr

	Test Rate
Year	MMBtu/hr
2004	53.07
2006	57.78
2008	86.94
2010	47.81
2012	71.74
2014	70.9
2016	59.2
2018	62.8
2020	47.8

Accommodated Firing Rate = (70.9 MMBtu/hr)x(8760 hr/yr) = 621,084 MMBtu/hr

Year	AERF Annual Rate (MMBtu/hr)
2014	593858.4
2015	480230.4
Avg	537044.4

Excluded Accommodated Firing Rate = 621,084 MMBtu/yr - 537044.4 MMBtu/yr = 84039.6 MMBtu/yr

### **AA-002 Wood Fired Boiler Projected Actual Emissions**

				Сара	Capacity		Emissions	
Pollutant	EF	Units	Ref	MMBtu/hr	MMBtu/yr	lb/hr	TPY	
PM	0.275	lb/MMBtu	1			27.03	108.35	
PM <sub>10</sub>	0.267	lb/MMBtu				26.27	105.30	
PM <sub>2.5</sub>	0.165	lb/MMBtu	2			16.27	65.21	
VOC	0.010	lb/MMBtu	1			1.02	4.09	
SO <sub>2</sub>	0.004	lb/MMBtu				0.44	1.75	
NO <sub>x</sub>	0.197	lb/MMBtu		'	98.4	788936.7	19.42	77.84
СО	0.203	lb/MMBtu			] 55.4	700000.7	20.01	80.21
Lead	4.80E-05	lb/MMBtu	3			0.00	0.02	
GHG	1.99E+02	lb/MMBtu	4,5			19,621	78,657	
CO <sub>2</sub>	1.95E+02	lb/MMBtu	4				19,188	76,921
CH <sub>4</sub>	2.10E-02	lb/MMBtu				2.07	8.28	
N <sub>2</sub> O	1.30E-02	lb/MMBtu				1.28	5.13	

#### Reference

Average of past three stack tests. 2016, 2018 and 2020

Average of PM test data adjusted by AP 42 Table 1.6-5 Cumulative Particle Size Distribution plus AP-42 Table 1.6-1. CPM factor of 0.017 lb/MMBtu.

AP-42 Factor from Table 1.6-4.

AP-42 Table 1.6-3.

Table A-1 to Subpart A of Part 98—Global Warming Potentials

#### **Calculation Methodology**

lb/hr = Capacity x EF

TPY =  $lb/hr \times 8760 hrs/yr \times ton/2000 lb$ 

The facility is requesting TPY limits on PM, PM10 and PM2.5 to avoid PSD review because the boiler controls will have to be evaluated to comply with the Boiler MACT within 3 years of beginning operation.

# **AA-002** Wood Fired Boiler Projected Actual HAP Emissions

VOC				AA-002	2			
HAP (y/n)	CAS Number	HAP Name		Wood Comb Emission Fa	ctors			l Emissions
			lb/MMBtu	Reference	Rating	lb/lb-steam	lb/hr	TPY
Y	75070	Acetaldehyde		Table 1.6-3.	A	1.36E-06	0.0817	0.3274
Y	107028	Acrolein		Table 1.6-3.	С	6.56E-06	0.3936	1.5779
Y	71432	Benzene (including benzene from gasoline)		Table 1.6-3.	A	6.89E-06	0.4133	1.6568
Y	56235	Carbon tetrachloride		Table 1.6-3.	D	7.38E-08	0.0044	0.0178
N	7782505	Chlorine	7.90E-04	Table 1.6-3.	D	1.30E-06	0.0777	0.3116
Y	108907	Chlorobenzene	3.30E-05	Table 1.6-3.	D	5.41E-08	0.0032	0.0130
Y	67663	Chloroform	2.80E-05	Table 1.6-3.	D	4.59E-08	0.0028	0.0110
N	132649	Dibenzofurans	1.67E-06			2.74E-09	0.0002	0.0007
Y	51285	2,4-Dinitrophenol	1.80E-07	Table 1.6-3.	С		0.0000	0.0001
Y	100414	Ethyl benzene	3.10E-05	Table 1.6-3.	D	5.08E-08	0.0031	0.0122
Y	107062	Ethylene dichloride (1,2-Dichloroethane)	2.90E-05	Table 1.6-3.	D	4.76E-08	0.0029	0.0114
Y	50000	Formaldehyde	4.40E-03	Table 1.6-3.	A	7.22E-06	0.4330	1.7357
N	7647010	Hydrochloric acid	3.82E-03	Table 1.6-3. Median	С	6.26E-06	0.3759	1.5069
Y	74839	Methyl bromide (Bromomethane)	1.50E-05	Table 1.6-3.	D	2.46E-08	0.0015	0.0059
Y	74873	Methyl chloride (Chloromethane)	2.30E-05	Table 1.6-3.	D	3.77E-08	0.0023	0.0091
Y	71556	Methyl chloroform (1,1,1-Trichloroethane)	3.10E-05	Table 1.6-3.	D	5.08E-08	0.0031	0.0122
	78933	Methyl ethyl ketone (2-Butanone)(See Modification)	5.40E-06	Table 1.6-3.	D		0.0005	0.0021
N	75092	Methylene chloride (Dichloromethane)	2.90E-04	Table 1.6-3.	D	4.76E-07	0.0285	0.1144
Y	108952	Phenol	5.10E-05	Table 1.6-3.	С	8.36E-08	0.0050	0.0201
Y	123386	Propionaldehyde	6.10E-05	Table 1.6-3.	D	1.00E-07	0.0060	0.0241
Y	78875	Propylene dichloride (1,2-Dichloropropane)	3.30E-05	Table 1.6-3.	D	5.41E-08	0.0032	0.0130
Y	100425	Styrene	1.90E-03	Table 1.6-3.	D	3.12E-06	0.1870	0.7495
Y	108883	Toluene	9.20E-04	Table 1.6-3.	С	1.51E-06	0.0905	0.3629
Y	75014	Vinyl chloride		Table 1.6-3.	D	2.95E-08	0.0018	0.0071
Y	95476	o-Xylenes	_	Table 1.6-3.	D	4.10E-08	0.0025	0.0099
N	0	Antimony Compounds	7.90E-06	Table 1.6-4.	С	1.30E-08	0.0008	0.0031
N	0	Arsenic Compounds (inorganic including arsine)	2.20E-05	Table 1.6-4.	A	3.61E-08	0.0022	0.0087

VOC				AA-002				
HAP (y/n)	CAS Number	HAP Name	Wood Combustion Emission Factors				Potential	Emissions
			lb/MMBtu	Reference	lb/lb-steam	lb/hr	TPY	
N	0	Beryllium Compounds	1.10E-06	Table 1.6-4.	В	1.80E-09	0.0001	0.0004
N	0	Cadmium Compounds	4.10E-06	Table 1.6-4.	A	6.72E-09	0.0004	0.0016
N	0	Chromium Compounds	2.10E-05	Table 1.6-4.	A	3.44E-08	0.0021	0.0083
N	0	Cobalt Compounds	6.50E-06	Table 1.6-4.	С	1.07E-08	0.0006	0.0026
N	0	Lead Compounds	4.80E-05	Table 1.6-4.	A	7.87E-08	0.0047	0.0189
N	0	Manganese Compounds	1.60E-03	Table 1.6-4.	A	2.62E-06	0.1574	0.6311
N	0	Mercury Compounds	3.50E-06	Table 1.6-4.	A	5.74E-09	0.0003	0.0014
N	0	Nickel Compounds	3.30E-05	Table 1.6-4.	A	5.41E-08	0.0032	0.0130
N	0	Selenium Compounds	2.80E-06	Table 1.6-4.	A	4.59E-09	0.0003	0.0011
Y	0	Polycylic Organic Matter4	1.35E-04	Sum Below		2.21E-07	0.0133	0.0532

Total VOC HAPs Total nonVOC HAPs Total HAPS Y 1.6539114 6.6302409 N 0.6545147 2.6238345 2.3084261 9.2540755

## **AA-006 Sawmill Fugitive Projected Actuals**

#### **Future Basis:**

	TPY	Reference			
Logs	830,625	Pine Production x 4.43 tons-logs/MBF			
Green tons chips	236,313	Recovery Analysis Based on Chip Yield, Chips 28.45%, sawdust 9%			
Green Sawdust	66,450	and bark 10% by weight. (based on 50% of throughput as small logs)			
Green Bark	83,063	Janu bark 10 % by Weight. (based on 50 % of throughput as small logs)			
BDT chips	118,156				
BDT Sawdust	33,225	Assume 50% m.c. wet basis			
BDT Bark	41,531				

	Thruput	Emission Factors					PM	PM <sub>10</sub>	PM <sub>2.5</sub>				
	TPY	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Units	Ref	TPY	TPY	TPY				
Debarking	830,625	0.0024	0.0012	0.0006	lb/ton-log	1,2	1.00	0.50	0.25				
Bucking	830,625	0.035	0.0175	0.00875	lb/ton-log	1,3	1.45	0.73	0.36				
Hog/Chipping	319,375	0.0024	0.0012	0.0006	lb/green ton	4	0.38	0.19	0.10				
			Conveying	ı (Avg 5 dı	ops)								
Sawdust	33,225	0.00075	0.00035	0.00005	BDT	1	0.01	0.01	0.00				
Chips	118,156	0.00075	0.00035	0.00005	BDT	1	0.04	0.02	0.00				
Bark	41,531	0.00075	0.00035	0.00005	BDT	1	0.02	0.01	0.00				
	<b>Total</b> 2.91 1.45 0.71												

<sup>1</sup> Emmission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country": Log Bucking, Log Debarking, drop of "wet" material

<sup>2</sup> Debarking assumes ring debarker factor is 10% of the drum debarker factor included in EPA Memo

<sup>3</sup> Log bucking assumes 90% control as the merchandiser includes partial enclosure.

<sup>4</sup> Hog/Chipping factor assumed equal to debarking, weight = bark + chips. Sawmill emissions reduced to zero due to being indoors.

#### **AA-007 Road Emissions Future Projected Actuals**

**Offsite Sales** 332,251 green tons/yr

> 830,625 tons/yr Log Use

		Miles	Empty Truck		Average Truck				PI	И	PM	110	PM	2.5
	Paved/	traveled		Loaded Truck										
Type of Truck	Unpaved	per truck	(tons)	Weight (tons)	(tons)	No Trucks/yr	VMT/hr	VMT/yr	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Log Truck	Unpaved	0.15				31,947	0.55	4,792	1.39	4.33	0.34	1.06	0.03	0.11
Log Truck	Paved	0.18	13	39	26	31,347	0.66	5,750	0.22	0.89	0.04	0.18	0.01	0.04
Residual Truck	Paved	0.36				12,779	0.53	4,600	0.17	0.71	0.03	0.14	0.01	0.03
		-	-	-			T	otal	1.78	5.93	0.42	1.38	0.05	0.18

Hourly Emissions = (VMT/hr) x E

Annual Emission =  $(VMT/yr) \times E_{ext} \times (ton/2000 lb)$ 

Unpaved Emission Factor

Pollutant	k (lb/VMT) <sup>I</sup>	<b>a</b> <sup>1</sup>	$\mathbf{b}^{I}$	Surface Material Silt Content, s (%) <sup>2</sup>	Mean Vehicle Weight, W (tons)	Controls (%) <sup>3</sup>		P⁴ # days 0.01 "rain	E <sup>5</sup> Hourly (lb/VMT)	E <sub>ext</sub> <sup>6</sup> Annual (lb/VMT)
TSP	4.9	0.7	0.45	3.9	26.0			105	2.54	1.81
$PM_{10}$	1.5	0.9	0.45	3.9	26.0	Max Speed ≤ 15 mph	57.0	105	0.62	0.44
PM <sub>2.5</sub>	0.15	0.9	0.45	3.9	26.0	15 mpn		105	0.06	0.04

<sup>1</sup> AP-42 Table 13.2.2-2. CONSTANTS FOR EQUATIONS 1a AND 1b

#### Paved Emission Factor

Pollutant	k <sup>I</sup> (lb/VMT)	Silt Loading, sL (g/m²)²	Mean Vehicle Weight, W (tons)	P <sup>3</sup> # days 0.01 "rain	E <sup>4</sup> Hourly (lb/VMT)	E <sub>ext</sub> <sup>5</sup> Annual (lb/VMT)
TSP	0.011	1.1	26.0	105	0.33	0.31
$PM_{10}$	0.0022	1.1	26.0	105	0.07	0.06
PM <sub>2.5</sub>	0.00054	1.1	26.0	105	0.02	0.02

<sup>1</sup> AP-42 Table 13.2.1-1. PARTICLE SIZE MULTIPLIERS FOR PAVED ROAD EQUATION

<sup>2</sup> EPA spreadsheet r13s0202\_dec03.xls, Surface Material Silt Content by state.

<sup>3</sup> WRAP Fugitive Dust Handbook September 7, 200

<sup>4</sup> AP-42 Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.

<sup>5</sup> AP-42 Section 13.2.2 Unpaved Roads Equation (1a) - E=k(S/12)<sup>a</sup> (W/3)<sup>b</sup>

<sup>6</sup> AP-42 Section 13.2.2 Unpaved Roads Equation (2) - Eext = E x (365-P)/365

AP-42 Table 13.2.1-3 TYPICAL SILT CONTENT AND LOADING VALUES FOR PAVED ROADS AT

<sup>|</sup> INDUSTRIAL FACILITIES. Low end of range selecte from Municipal Solid Waste Landfill 3 AP-42 Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States. 4 AP-42 Section 13.2.1.3 Equation (1): E = k (sL)<sup>0.91</sup> x (W)<sup>1.02</sup>

<sup>5</sup> AP- 42 Section 13.2.1.3 Equation (2): Eext =  $[k(sL)^{0.91} \times (W)^{1.02}](1 - P/4N)$ 

## AA-013 - Truck Loadout Operation, 20 TPH capacity.

	Capacity (BDT)		Emission Factors			PM		PM <sub>10</sub>		PM <sub>2.5</sub>		
	TPH	TPY	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Units	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Loadout	20.0	203,233	0.00075	0.00035	0.00005	BDT	0.02	0.11	0.01	0.05	0.00	0.01
						Total	0.02	0.11	0.01	0.05	0.00	0.01

Emmission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country"

Loadout at 20 TPH. Assume average of three drops of material during loadout and green residuals are 50% moisture.

# **AA-002 Wood Fired Boiler Baseline Actual Emissions**

				2014	2015	2-yr Avg	
Pollutant	EF	Units	Ref	MMBtu/yr	MMBtu/yr	MMBtu/yr	TPY
PM	0.329	lb/MMBtu	1				88.34
PM <sub>10</sub>	0.316	lb/MMBtu					84.96
PM <sub>2.5</sub>	0.195	lb/MMBtu	2				52.27
VOC	0.010	lb/MMBtu					2.78
SO <sub>2</sub>	0.004	lb/MMBtu	1				1.19
NO <sub>x</sub>	0.197	lb/MMBtu	'	593858.4	480230.4	537044.4	52.99
СО	0.203	lb/MMBtu		000000.4	+00200.4	007044.4	54.60
Lead	4.80E-05	lb/MMBtu	3				0.01
GHG	1.99E+02	lb/MMBtu	4,5				53,543
CO <sub>2</sub>	1.95E+02	lb/MMBtu					52,362
CH <sub>4</sub>	2.10E-02	lb/MMBtu	4				5.64
N <sub>2</sub> O	1.30E-02	lb/MMBtu					3.49

#### Reference

Reference
2014 Stack Test
PM test data adjusted by AP 42 Table 1.6-5 Cumulative Particle Size Distribution plus AP-
42 Table 1.6-1. CPM factor of 0.017 lb/MMBtu.
AP-42 Factor from Table 1.6-4.
AP-42 Table 1.6-3.
Table A-1 to Subpart A of Part 98—Global Warming Potentials

## **Calculation Methodology**

TPY = (2-yr avg Annual Avg Capacity)(EF)(ton/2000 lb)

Vicksburg Forest Products

#### AA-006 Sawmill Fugitives 2014 Baseline Emissions

	TPY	Reference
Logs <sup>1</sup>	206,948	Hardwood and Pine Production x 4.43 tons-logs/MBF
Green tons chips	58,877	Recovery Analysis Based on Chip Yield, Chips 28.45%, sawdust 9%
Green Sawdust	18,625	and bark 10% by weight.
Green Bark	20,695	and bank 1070 by weight.
BDT chips	29,438	
BDT Sawdust	9,313	Assume 50% m.c. wet basis
BDT Bark	10,347	
1 Log use reported in 2014	AERF	

	Thruput		Emissio	n Factors		PM	PM <sub>10</sub>	PM <sub>2.5</sub>
	TPY	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Units	TPY	TPY	TPY
Debarking	206,948	0.0024	0.0012	0.0006	lb/ton-log	0.25	0.12	0.06
Bucking	206,948	0.035	0.0175	0.00875	lb/ton-log	0.36	0.18	0.09
Hog/Chipping	79,572	0.0024	0.0012	0.0006	lb/green ton	0.10	0.05	0.02
		Conv	eying (Avg	5 drops)				
Sawdust	9,313	0.00075	0.00035	0.00005	BDT	0.00	0.00	0.00
Chips	29,438	0.00075	0.00035	0.00005	BDT	0.01	0.01	0.00
Bark	10,347	0.00075	0.00035	0.00005	BDT	0.00	0.00	0.00
					Total	0.72	0.36	0.18

Emmission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country": Log Bucking, Log Debarking, drop of "wet" material

Debarking assumes ring debarker factor is 10% of the drum debarker factor included in EPA Memo

<sup>3</sup> Log bucking assumes 90% control as the merchandiser includes partial enclosure.

<sup>4</sup> Hog/Chipping factor assumed equal to debarking, weight = bark + chips. Sawmill emissions reduced to zero due to being indoors.

#### AA-007 Road Emissions - 2014 Baseline

Offsite Sales 61,501 green tons/yr

Log Use 206,948 tons/yr

		Miles	Empty Truck	Loaded Truck	Average Truck				Pi	М	PM	110	PM	2.5
Type of Truck	Paved/	traveled	Weight	Weight (tons)	Weight	No Trucko/m	VMT/hr	VMT/vr	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Type of Truck	Unpaved Unpaved	per truck 0.15	(tons)	(toris)	(tons)	No Trucks/yr	0.14	1,194	0.35	1.08	0.08		0.01	0.03
Log Truck	Paved	0.2	13	39	26	7960	0.16	1,433	0.05	0.22	0.01	0.04	0.00	
Residual Truck	Paved	0.4				2,365.42	0.10	852	0.03	0.13	0.01	0.03	0.00	0.01
-					To	otal	0.43	1.43	0.10	0.33	0.01	0.04		

**Unpaved Emission Factor** 

Pollutant	k (lb/VMT) <sup>1</sup>	a <sup>1</sup>	b <sup>1</sup>	Surface Material Silt Content, s (%) <sup>2</sup>	Mean Vehicle Weight, W (tons)	Controls (%) <sup>3</sup>		# days <sup>4</sup> 0.01 "rain	E <sup>5</sup> Hourly (lb/VMT)	Eext <sup>6</sup> Annual (lb/VMT)
TSP	4.9	0.7	0.45	3.9	26.0			105	2.54	1.81
$PM_{10}$	1.5	0.9	0.45	3.9	26.0	Max Speed ≤ 15 mph	57.0	105	0.62	0.44
PM <sub>2.5</sub>	0.15	0.9	0.45	3.9	26.0	15 mpn		105	0.06	0.04

#### Paved Emission Factor

Pollutant	k (lb/VMT)	Surface Material Silt Content, s (%)	Mean Vehicle Weight, W (tons)	# days 0.01 "rain	Hourly (lb/VMT)	Annual (lb/VMT)
TSP	0.011	1.1	26.0	105	0.33	0.31
$PM_{10}$	0.0022	1.1	26.0	105	0.07	0.06
PM <sub>2.5</sub>	0.00054	1.1	26.0	105	0.02	0.02

<sup>1</sup> AP-42 Table 13.2.2-2. CONSTANTS FOR EQUATIONS 1a AND 1b EPA spreadsheet r13s0202\_dec03.xls, Surface Material Silt Content by state.

<sup>3</sup> WRAP Fugitive Dust Handbook September 7, 200

<sup>4</sup> AP-42 Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.
5 AP-42 Section 13.2.2 Unpaved Roads Equation (1a)
6 AP-42 Section 13.2.2 Unpaved Roads Equation (2)

AP-42 Table 13.2.1-3 TYPICAL SILT CONTENT AND LOADING VALUES FOR PAVED ROADS AT

AP-42 Table 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States.

AP-42 Section 13.2.1.3 Equation (1): E = k (sL)<sup>0.91</sup> x (W)<sup>1.02</sup>

5 AP-42 Section 13.2.1.3 Equation (2): Eext = [k (sL)<sup>0.91</sup> x (W)<sup>1.02</sup>] (1 – P/4N)

## AA-006 Sawmill Fugitives 2015 Baseline

	TPY	Reference
Logs	219,436	Hardwood and Pine Production x 4.43 tons-logs/MBF
Green tons chips	62,430	Recovery Analysis Based on Chip Yield, Chips 28.45%, sawdust 9%
Green Sawdust	19,749	and bark 10% by weight.
Green Bark	21,944	and bank 10% by weight.
BDT chips	31,215	
BDT Sawdust	9,875	Assume 50% m.c. wet basis
BDT Bark	10,972	

	Thruput	Emission Factors				PM	PM <sub>10</sub>	PM <sub>2.5</sub>	
	TPY	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Units	Ref	TPY	TPY	TPY
Debarking	219,436	0.0024	0.0012	0.0006	lb/ton-log	1,2	0.26	0.13	0.07
Bucking	219,436	0.035	0.0175	0.00875	lb/ton-log	1,3	0.96	0.48	0.24
Hog/Chipping	84,373	0.0024	0.0012	0.0006	lb/green ton	4	0.10	0.05	0.03
Conveying (Avg 5 drops	5)				-				
Sawdust	9,875	0.00075	0.00035	0.00005	BDT	1	0.00	0.00	0.00
Chips	31,215	0.00075	0.00035	0.00005	BDT	1	0.01	0.01	0.00
Bark	10,972	0.00075	0.00035	0.00005	BDT	1	0.00	0.00	0.00
					-	Total	1.34	0.67	0.33

Emmission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country": Log Bucking, Log Debarking, drop of "wet" material

<sup>2</sup> Debarking assumes ring debarker factor is 10% of the drum debarker factor included in EPA Memo

<sup>3</sup> Log bucking assumes 90% control as the merchandiser includes partial enclosure.

<sup>4</sup> Hog/Chipping factor assumed equal to debarking, weight = bark + chips. Sawmill emissions reduced to zero due to being indoors.

#### AA-007 Road Emissions 2015 Baseline Emission

Offsite Sales 35,916 green tons/yr

Log Use 219,436 tons/yr

		Miles	Empty Truck	Loaded Truck	Average Truck				Pľ	М	PM	110	PM	2.5
	Paved/	traveled	Weight	Weight	Weight									
Type of Truck	Unpaved	per truck	(tons)	(tons)		No Trucks/yr	VMT/hr	VMT/yr	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Log Truck	Unpaved	0.15				8440	0.14	1,266	0.37	1.14	0.09	0.28	0.01	0.03
Log Huck	Paved	0.18	13	39	26	0440	0.17	1,519	0.06	0.23	0.01	0.05	0.00	0.01
Residual Truck	Paved	0.36				1,381.38	0.06	497	0.02	0.08	0.00	0.02	0.00	0.00
							To	otal	0.44	1.45	0.10	0.34	0.01	0.04

**Unpaved Emission Factor** 

Pollutant	k (lb/VMT)	a	b	Surface Material Silt Content, s (%)	Mean Vehicle Weight, W (tons)	Controls	(%)	# days 0.01 "rain	Hourly (lb/VMT)	Annual (lb/VMT)
TSP	4.9	0.7	0.45	3.9	26.0			105	2.54	1.81
$PM_{10}$	1.5	0.9	0.45	3.9	26.0	Max Speed ≤ 15 mph	57.0	105	0.62	0.44
PM <sub>2.5</sub>	0.15	0.9	0.45	3.9	26.0	13 mpn		105	0.06	0.04

AP-42 Table 13.2.2-2. CONSTANTS FOR EQUATIONS 1a AND 1b

EPA spreadsheet r13s0202\_dec03.xis, Surface Material Silt Content by state.

WRAP Fugitive Dust Handbook September 7, 200

AP-42 Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.

AP-42 Section 13.2.2 Unpaved Roads Equation (1a)

AP-42 Section 13.2.2 Unpaved Roads Equation (2)

#### Paved Emission Factor

Pollutant	k (lb/VMT)	Surface Material Silt Content, s (%)	Mean Vehicle Weight, W (tons)	# days 0.01 "rain	Hourly (lb/VMT)	Annual (lb/VMT)
TSP	0.011	1.1	26.0	105	0.33	0.31
$PM_{10}$	0.0022	1.1	26.0	105	0.07	0.06
PM <sub>2.5</sub>	0.00054	1.1	26.0	105	0.02	0.02

AP-42 Table 13.2.1-3 TYPICAL SILT CONTENT AND LOADING VALUES FOR PAVED ROADS AT AP-42 Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States.

4 AP-42 Section 13.2.1.3 Equation (1): E = k (sL)<sup>0.91</sup> x (W)<sup>1.02</sup>

5 AP-42 Section 13.2.1.3 Equation (2): Eext = [k (sL)<sup>0.91</sup> x (W)<sup>1.02</sup>] (1 – P/4N)

# **Baseline as Reported in AERF**

				2-yr Annual
		2015	2014	Average
Source	Pollutant	(TPY)	(TPY)	(TPY)
AA-001 Woodwaste Handling	PM	0.15	0.33	0.24
System with 1 Baghouse and	PM <sub>10</sub>	0.15	0.33	0.24
Cyclone	PM <sub>2.5</sub>	0.15	0.33	0.24
AA-009	VOC			
Lumber Treatment		0.00	0.00	0.00
AA-010	voc	6.40	0.00	2.25
End Coating		6.42	0.08	3.25

## AA-013 - Truck Loadout Operation, 20 TPH capacity.

	Capacity (	Emi	ssion Fact	ors	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
	TPY	PM	PM <sub>10</sub>	$PM_{2.5}$	TPY	TPY	TPY
Loadout 2014	30,751	0.00075	0.00035	0.00005	0.02	0.01	0.00
Loadout 2015	17,958	0.00075	0.00035	0.00005	0.01	0.00	0.00
		0.01	0.01	0.00			

Emmission Factors from May 8, 2014, EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country"

Loadout at 20 TPH. Assume average of three drops of material during loadout and green residuals are 50% moisture.

# Appendix C

Emission Factor Reference

The following empirical expressions may be used to estimate the quantity in pounds (lb) of size-specific particulate emissions from an unpaved road, per vehicle mile traveled (VMT):

For vehicles traveling on unpaved surfaces at industrial sites, emissions are estimated from the following equation:

$$E = k (s/12)^a (W/3)^b$$
 (1a)

and, for vehicles traveling on publicly accessible roads, dominated by light duty vehicles, emissions may be estimated from the following:

$$E = \frac{k (s/12)^{a} (S/30)^{d}}{(M/0.5)^{c}} - C$$
 (1b)

where k, a, b, c and d are empirical constants (Reference 6) given below and

E = size-specific emission factor (lb/VMT)

s = surface material silt content (%)

W = mean vehicle weight (tons)

M = surface material moisture content (%)

S = mean vehicle speed (mph)

C = emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear.

The source characteristics s, W and M are referred to as correction parameters for adjusting the emission estimates to local conditions. The metric conversion from lb/VMT to grams (g) per vehicle kilometer traveled (VKT) is as follows:

$$1 \text{ lb/VMT} = 281.9 \text{ g/VKT}$$

The constants for Equations 1a and 1b based on the stated aerodynamic particle sizes are shown in Tables 13.2.2-2 and 13.2.2-4. The PM-2.5 particle size multipliers (k-factors) are taken from Reference 27.

Table 13.2.2-2. CONSTANTS FOR EQUATIONS 1a AND 1b

	Industria	al Roads (Equa	ntion 1a)	Public Roads (Equation 1b)			
Constant	PM-2.5	PM-10	PM-30*	PM-2.5	PM-10	PM-30*	
k (lb/VMT)	0.15	1.5	4.9	0.18	1.8	6.0	
a	0.9	0.9	0.7	1	1	1	
ь	0.45	0.45	0.45	-	ı	-	
С	-	ı	ı	0.2	0.2	0.3	
d	-			0.5	0.5	0.3	
Quality Rating	В	В	В	В	В	В	

<sup>\*</sup>Assumed equivalent to total suspended particulate matter (TSP)

Table 13.2.2-2 also contains the quality ratings for the various size-specific versions of Equation 1a and 1b. The equation retains the assigned quality rating, if applied within the ranges of source conditions, shown in Table 13.2.2-3, that were tested in developing the equation:

Table 13.2.2-3. RANGE OF SOURCE CONDITIONS USED IN DEVELOPING EQUATION 1a AND 1b

		Mean Vehicle Weight			Vehicle eed	Mean	Surface Moisture
Emission Factor	Surface Silt Content, %	Mg	ton	km/hr	mph	No. of Wheels	Content, %
Industrial Roads (Equation 1a)	1.8-25.2	1.8-260	2-290	8-69	5-43	4-17ª	0.03-13
Public Roads (Equation 1b)	1.8-35	1.4-2.7	1.5-3	16-88	10-55	4-4.8	0.03-13

<sup>&</sup>lt;sup>a</sup> See discussion in text.

As noted earlier, the models presented as Equations 1a and 1b were developed from tests of traffic on unpaved surfaces. Unpaved roads have a hard, generally nonporous surface that usually dries quickly after a rainfall or watering, because of traffic-enhanced natural evaporation. (Factors influencing how fast a road dries are discussed in Section 13.2.2.3, below.) The quality ratings given above pertain to the mid-range of the measured source conditions for the equation. A higher mean vehicle weight and a higher than normal traffic rate may be justified when performing a worst-case analysis of emissions from unpaved roads.

The emission factors for the exhaust, brake wear and tire wear of a 1980's vehicle fleet (C) was obtained from EPA's MOBILE6.2 model  $^{23}$ . The emission factor also varies with aerodynamic size range

<sup>&</sup>quot;-" = not used in the emission factor equation

average uncontrolled conditions (but including natural mitigation) under the simplifying assumption that annual average emissions are inversely proportional to the number of days with measurable (more than 0.254 mm [0.01 inch]) precipitation:

$$E_{\text{ext}} = E [(365 - P)/365]$$
 (2)

where:

 $E_{ext}$  = annual size-specific emission factor extrapolated for natural mitigation, lb/VMT

E = emission factor from Equation 1a or 1b

P = number of days in a year with at least 0.254 mm (0.01 in) of precipitation (see

below)

Figure 13.2.2-1 gives the geographical distribution for the mean annual number of "wet" days for the United States.

Equation 2 provides an estimate that accounts for precipitation on an annual average basis for the purpose of inventorying emissions. It should be noted that Equation 2 does not account for differences in the temporal distributions of the rain events, the quantity of rain during any event, or the potential for the rain to evaporate from the road surface. In the event that a finer temporal and spatial resolution is desired for inventories of public unpaved roads, estimates can be based on a more complex set of assumptions. These assumptions include:

- 1. The moisture content of the road surface material is increased in proportion to the quantity of water added;
- 2. The moisture content of the road surface material is reduced in proportion to the Class A pan evaporation rate;
- 3. The moisture content of the road surface material is reduced in proportion to the traffic volume; and
- 4. The moisture content of the road surface material varies between the extremes observed in the area. The CHIEF Web site (http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html) has a file which contains a spreadsheet program for calculating emission factors which are temporally and spatially resolved. Information required for use of the spreadsheet program includes monthly Class A pan evaporation values, hourly meteorological data for precipitation, humidity and snow cover, vehicle traffic information, and road surface material information.

It is emphasized that the simple assumption underlying Equation 2 and the more complex set of assumptions underlying the use of the procedure which produces a finer temporal and spatial resolution have not been verified in any rigorous manner. For this reason, the quality ratings for either approach should be downgraded one letter from the rating that would be applied to Equation 1.

#### 13.2.2.3 Controls<sup>18-22</sup>

A wide variety of options exist to control emissions from unpaved roads. Options fall into the following three groupings:

1. Vehicle restrictions that limit the speed, weight or number of vehicles on the road;

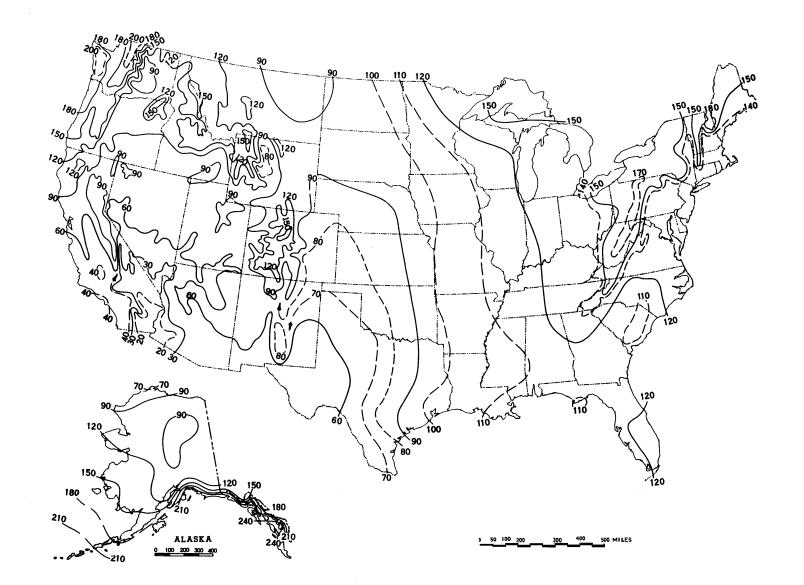


Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.

#### 13.2.1.3 Predictive Emission Factor Equations 10,29

The quantity of particulate emissions from resuspension of loose material on the road surface due to vehicle travel on a dry paved road may be estimated using the following empirical expression:

$$E = k (sL)^{0.91} \times (W)^{1.02}$$
 (1)

where: E = particulate emission factor (having units matching the units of k),

k = particle size multiplier for particle size range and units of interest (see below),

SL = road surface silt loading (grams per square meter) (g/m<sup>2</sup>), and

W = average weight (tons) of the vehicles traveling the road.

It is important to note that Equation 1 calls for the average weight of all vehicles traveling the road. For example, if 99 percent of traffic on the road are 2 ton cars/trucks while the remaining 1 percent consists of 20 ton trucks, then the mean weight "W" is 2.2 tons. More specifically, Equation 1 is *not* intended to be used to calculate a separate emission factor for each vehicle weight class. Instead, only one emission factor should be calculated to represent the "fleet" average weight of all vehicles traveling the road.

The particle size multiplier (k) above varies with aerodynamic size range as shown in Table 13.2.1-1. To determine particulate emissions for a specific particle size range, use the appropriate value of k shown in Table 13.2.1-1.

To obtain the total emissions factor, the emissions factors for the exhaust, brake wear and tire wear obtained from either EPA's MOBILE6.2 <sup>27</sup> or most recent MOVES <sup>29</sup> software model should be added to the emissions factor calculated from the empirical equation.

Size range <sup>a</sup>	Pa	Particle Size Multiplier k <sup>b</sup>					
8	g/VKT	g/VMT	lb/VMT				
PM-2.5°	0.15	0.25	0.00054				
PM-10	0.62	1.00	0.0022				
PM-15	0.77	1.23	0.0027				
PM-30 <sup>d</sup>	3.23	5.24	0.011				

Table 13.2.1-1. PARTICLE SIZE MULTIPLIERS FOR PAVED ROAD EQUATION

<sup>&</sup>lt;sup>a</sup> Refers to airborne particulate matter (PM-x) with an aerodynamic diameter equal to or less than x micrometers.

<sup>&</sup>lt;sup>b</sup> Units shown are grams per vehicle kilometer traveled (g/VKT), grams per vehicle mile traveled (g/VMT), and pounds per vehicle mile traveled (lb/VMT). The multiplier k includes unit conversions to produce emission factors in the units shown for the indicated size range from the mixed units required in Equation 1.

<sup>&</sup>lt;sup>c</sup> The k-factors for PM<sub>2.5</sub> were based on the average PM<sub>2.5</sub>:PM<sub>10</sub> ratio of test runs in Reference 30.

<sup>&</sup>lt;sup>d</sup> PM-30 is sometimes termed "suspendable particulate" (SP) and is often used as a surrogate for TSP.

N = number of days in the averaging period (e.g., 365 for annual, 91 for seasonal, 30 for monthly).

Note that the assumption leading to Equation 2 is based on analogy with the approach used to develop long-term average unpaved road emission factors in Section 13.2.2. However, Equation 2 above incorporates an additional factor of "4" in the denominator to account for the fact that paved roads dry more quickly than unpaved roads and that the precipitation may not occur over the complete 24-hour day.

For the hourly basis, equation 1 becomes:

$$E_{ext} = [k (sL)^{0.91} \times (W)^{1.02}] (1 - 1.2P/N)$$
 (3)

where k, sL, W, and S are as defined in Equation 1 and

 $E_{ext}$  = annual or other long-term average emission factor in the same units as k,

P = number of hours with at least 0.254 mm (0.01 in) of precipitation during the averaging period, and

N = number of hours in the averaging period (e.g., 8760 for annual, 2124 for season 720 for monthly)

Note: In the hourly moisture correction term (1-1.2P/N) for equation 3, the 1.2 multiplier is applied to account for the residual mitigative effect of moisture. For most applications, this equation will produce satisfactory results. Users should select a time interval to include sufficient "dry" hours such that a reasonable emissions averaging period is evaluated. For the special case where this equation is used to calculate emissions on an hour by hour basis, such as would be done in some emissions modeling situations, the moisture correction term should be modified so that the moisture correction "credit" is applied to the first hours following cessation of precipitation. In this special case, it is suggested that this 20% "credit" be applied on a basis of one hour credit for each hour of precipitation up to a maximum of 12 hours.

Note that the assumption leading to Equation 3 is based on analogy with the approach used to develop long-term average unpaved road emission factors in Section 13.2.2.

Figure 13.2.1-2 presents the geographical distribution of "wet" days on an annual basis for the United States. Maps showing this information on a monthly basis are available in the *Climatic Atlas of the United States*<sup>23</sup>. Alternative sources include other Department of Commerce publications (such as local climatological data summaries). The National Climatic Data Center (NCDC) offers several products that provide hourly precipitation data. In particular, NCDC offers *Solar and Meteorological Surface Observation Network 1961-1990* (SAMSON) CD-ROM, which contains 30 years worth of hourly meteorological data for first-order National Weather Service locations. Whatever meteorological data are used, the source of that data and the averaging period should be clearly specified.

It is emphasized that the simple assumption underlying Equations 2 and 3 has not been verified in any rigorous manner. For that reason, the quality ratings for Equations 2 and 3 should be downgraded one letter from the rating that would be applied to Equation 1.

Table 13.2.1-3 (Metric And English Units). TYPICAL SILT CONTENT AND LOADING VALUES FOR PAVED ROADS AT INDUSTRIAL FACILITIES <sup>a</sup>

					HCILITIES	1			1	
					No. of				Silt Loa	ding
	No. of	No. Of	Silt Conte	nt (%)	Travel	Total Lo	ading x	10-3	(g/m <sup>2</sup>	2)
Industry	Sites	Samples	Range	Mean	Lanes	Range	Mean	Units <sup>b</sup>	Range	Mean
Copper smelting	1	3	15.4-21.7	19.0	2	12.9 - 19.5	15.9	kg/km	188-400	292
						45.8 - 69.2	55.4	lb/mi		
Iron and steel production	9	48	1.1-35.7	12.5	2	0.006 - 4.77	0.495	kg/km	0.09-79	9.7
						0.020 -16.9	1.75	lb/mi		
Asphalt batching	1	3	2.6 - 4.6	3.3	1	12.1 - 18.0	14.9	kg/km	76-193	120
						43.0 - 64.0	52.8	lb/mi		
Concrete batching	1	3	5.2 - 6.0	5.5	2	1.4 - 1.8	1.7	kg/km	11-12	12
						5.0 - 6.4	5.9	lb/mi		
Sand and gravel processing	1	3	6.4 - 7.9	7.1	1	2.8 - 5.5	3.8	kg/km	53-95	70
						9.9 - 19.4	13.3	lb/mi		
Municipal solid waste landfill	2	7		-	2	-			1.1-32.0	7.4
Quarry	1	6		-	2	-			2.4-14	8.2
Corn wet mills	3	15		-	2	-			0.05 - 2.9	1.1

<sup>&</sup>lt;sup>a</sup> References 1-2,5-6,11-13. Values represent samples collected from *industrial* roads. Public road silt loading values are presented in Table-13.2.1-2. Dashes indicate information not available. Multiply entries by 1000 to obtain stated units; kilograms per kilometer (kg/km) and pounds per mile (lb/mi).

Table 1.6-1. EMISSION FACTORS FOR PM FROM WOOD RESIDUE COMBUSTION<sup>a</sup>

		Filtera	ble PM	Filterable PM-	-10 <sup>b</sup>	Filterable PM-2	2.5 <sup>b</sup>
Fuel	PM Control Device	Emission Factor (lb/MMbtu)	EMISSION FACTOR RATING	Emission Factor (lb/MMbtu)	EMISSION FACTOR RATING	Emission Factor (lb/MMbtu)	EMISSION FACTOR RATING
Bark/Bark and Wet Wood	No Control <sup>c</sup>	0.56 <sup>d</sup>	C	0.50 <sup>e</sup>	D	0.43 <sup>e</sup>	D
Dry Wood	No Control <sup>c</sup>	$0.40^{\rm f}$	A	0.36 <sup>e</sup>	D	0.31 <sup>e</sup>	D
Wet Wood	No Control <sup>c</sup>	0.33 <sup>g</sup>	A	0.29 <sup>e</sup>	D	0.25 <sup>e</sup>	D
Bark	Mechanical Collector*	0.54 <sup>h</sup>	D	0.49 <sup>e</sup>	D	0.29 <sup>e</sup>	D
Bark and Wet Wood	Mechanical Collector*	0.35 <sup>i</sup>	C	0.32 <sup>e</sup>	D	0.19 <sup>e</sup>	D
Dry Wood	Mechanical Collector*	0.30 <sup>j</sup>	A	0.27 <sup>e</sup>	D	$0.16^{\rm e}$	D
Wet Wood	Mechanical Collector*	0.22 <sup>k</sup>	A	0.20 <sup>e</sup>	D	0.12 <sup>e</sup>	D
All Fuels <sup>m</sup>	Electrolyzed Gravel Bed	0.1 <sup>m</sup>	D	0.074 <sup>e</sup>	D	0.065 <sup>e</sup>	D
All Fuels <sup>m</sup>	Wet Scrubber	0.066 <sup>n</sup>	A	0.065 <sup>e</sup>	D	0.065 <sup>e</sup>	D
All Fuels <sup>m</sup>	Fabric Filter	0.1°	C	0.074 <sup>e</sup>	D	0.065 <sup>e</sup>	
All Fuels <sup>m</sup>	Electrostatic Precipitator	0.054 <sup>p</sup>	В	0.04 <sup>e</sup>	D	$0.035^{e}$	
		Condensible PM					
All Fuels <sup>m</sup>	All Controls/No Controls	0.017 <sup>q</sup>	A				

Table 1.6-3. (cont.)

	Average Emission Factor <sup>b</sup>	
Organic Compound	(lb/MMBtu)	EMISSION FACTOR RATING
Hexachlorobiphenyl	5.5 E-10 <sup>r</sup>	D
Hexanal	7.0 E-06 <sup>z</sup>	D
Heptachlorodibenzo-p-dioxins	2.0 E-09 <sup>aa</sup>	С
Heptachlorodibenzo-p-furans	2.4 E-10 <sup>aa</sup>	C
Hexachlorodibenzo-p-dioxins	1.6 E-06 <sup>aa</sup>	C
Hexachlorodibenzo-p-furans	2.8 E-10 <sup>aa</sup>	С
Hydrogen chloride	1.9 E-02 <sup>j</sup>	С
Indeno(1,2,3,c,d)pyrene	8.7 E-08 <sup>1</sup>	В
Isobutyraldehyde	$1.2 \text{ E}-05^{z}$	D
Methane	2.1 E-02 <sup>f</sup>	C
2-Methylnaphthalene	1.6 E-07 <sup>z</sup>	D
Monochlorobiphenyl	2.2 E-10 <sup>r</sup>	D
Naphthalene	9.7 E-05 <sup>ab</sup>	Α
2-Nitrophenol	2.4 E-07 <sup>w</sup>	С
4-Nitrophenol	1.1 E-07 <sup>w</sup>	С
Octachlorodibenzo-p-dioxins	6.6 E-08 <sup>aa</sup>	В
Octachlorodibenzo-p-furans	8.8 E-11 <sup>aa</sup>	С
Pentachlorodibenzo-p-dioxins	1.5 E-09 <sup>aa</sup>	В
Pentachlorodibenzo-p-furans	4.2 E-10 <sup>aa</sup>	С
Pentachlorobiphenyl	1.2 E-09 <sup>r</sup>	D
Pentachlorophenol	5.1 E-08 <sup>ac</sup>	C
Perylene	5.2 E-10 <sup>f</sup>	D
Phenanthrene	7.0 E-06 <sup>ad</sup>	В
Phenol	5.1 E-05 <sup>ae</sup>	С
Propanal	3.2 E-06 <sup>z</sup>	D
Propionaldehyde	6.1 E-05 <sup>f</sup>	D
Pyrene	3.7 E-06 <sup>af</sup>	A
Styrene	1.9 E-03 <sup>f</sup>	D
2,3,7,8-Tetrachlorodibenzo-p-dioxins	8.6 E-12 <sup>aa</sup>	С
Tetrachlorodibenzo-p-dioxins	4.7 E-10 <sup>ag</sup>	С
2,3,7,8-Tetrachlorodibenzo-p-furans	9.0 E-11 <sup>aa</sup>	С
Tetrachlorodibenzo-p-furans	7.5 E-10 <sup>aa</sup>	C
Tetrachlorobiphenyl	2.5 E-09 <sup>r</sup>	D
Tetrachloroethene	3.8 E-05 <sup>t</sup>	D
o-Tolualdehyde	7.2 E-06 <sup>j</sup>	D
p-Tolualdehyde	1.1 E-05 <sup>2</sup>	D
Toluene	9.2 E-04 <sup>v</sup>	C
Trichlorobiphenyl	2.6 E-09 <sup>r</sup>	C
1,1,1-Trichloroethane	3.1 E-05 <sup>t</sup>	D
Trichloroethene	3.0 E-05 <sup>t</sup>	D
Trichlorofluoromethane	4.1 E-05	D
2,4,6-Trichlorophenol	<2.2 E-08 <sup>ak</sup>	C

Organic Compound	Average Emission Factor <sup>b</sup> (lb/MMBtu)	EMISSION FACTOR RATING
Vinyl Chloride	1.8 E-05 <sup>r</sup>	D
o-Xylene	2.5 E-05 <sup>v</sup>	D
Total organic compounds (TOC)	0.039 <sup>ai</sup>	D
Volatile organic compounds (VOC)	$0.017^{\mathrm{aj}}$	D
Nitrous Oxide (N <sub>2</sub> O)	0.013 <sup>ak</sup>	D
Carbon Dioxide (CO <sub>2</sub> )	195 <sup>al</sup>	A

- <sup>a</sup> Units of lb of pollutant/million Btu (MMBtu) of heat input. To convert from lb/MMBtu to lb/ton, multiply by (HHV \* 2000), where HHV is the higher heating value of the fuel, MMBtu/lb. To convert lb/MMBtu to kg/J, multiply by 4.3E-10. These factors apply to Source Classification Codes (SCC) 1-0X-009-YY, where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional, and where Y = 01 for bark-fired boiler, 02 for bark and wet wood-fired boiler, 03 for wet wood-fired boiler, and 08 for dry wood-fired boiler.
- <sup>b</sup> Factors are for boilers with no controls or with particulate matter controls.
- c References 26, 34, 36, 59, 60, 65, 71-73, 75.
- d References 26, 33, 34, 36, 59, 60, 65, 71-73, 75.
- <sup>e</sup> References, 26, 35, 36, 46, 50, 59, 60, 65, 71-75.
- f Reference 26.
- g Reference 33.
- h Reference 26, 50, 83.
- <sup>i</sup> References 26, 34, 36, 59, 60, 65, 71-73, 75.
- j References 26, 50.
- <sup>k</sup> References 26, 35, 36, 46, 59, 60, 65, 70, 71-75.
- <sup>1</sup> References 26, 36, 59, 60, 65, 70-75.
- <sup>m</sup> References 26, 33, 36, 59, 60, 65, 70-73, 75.
- <sup>n</sup> References 26, 33, 36, 59, 60, 65, 71-73, 75.
- o Reference 34.
- <sup>p</sup> References 26, 36, 60, 65, 71-75.
- <sup>q</sup> References 26, 33.
- r References 26.
- s Reference 83.
- t References 26, 72.
- <sup>u</sup> References 35, 60, 65, 71, 72.
- v References 26, 72.
- <sup>w</sup> References 35, 60, 65, 71, 72.
- x References 26, 33, 34, 59, 60, 65, 71-75.
- y References 26, 28, 35, 36, 46 51, 59, 60, 65, 70, 71-75, 79, 81, 82.
- <sup>z</sup> Reference 50.
- aa Reference 26, 45.
- ab References 26, 33, 34, 36, 59, 60, 65, 71-75, 83.
- ac References 26, 35, 60, 65, 71, 72.
- <sup>ad</sup> References 26, 33, 34, 36, 59, 60, 65, 71 73.
- ae References 26, 33, 34, 35, 60, 65, 70, 71, 72.
- af References 26, 33, 34, 36, 59, 60, 65, 71 73, 83.
- ag References 26, 45.
- <sup>ah</sup> References 26, 35, 60, 65, 71.
- ai TOC = total organic compounds. Factor is the sum of all factors in table except nitrous oxide and carbon dioxide.
- VOC volatile organic compounds. Factor is the sum of all factors in table except hydrogen chloride, chlorine, formaldehyde, tetrachloroethene, 1,1,1,-trichloroethane, dichloromethane, acetone, nitrous oxide, methane, and carbon dioxide.
- ak Reference 83.
- al References 19 26, 33 49, 51- 57, 77, 79 82, 84 86.

Table 1.6-4. EMISSION FACTORS FOR TRACE ELEMENTS FROM WOOD RESIDUE COMBUSTION<sup>a</sup>

Trace Element	Average Emission Factor (lb/MMBtu) <sup>b</sup>	EMISSION FACTOR RATING
Antimony	7.9 E-06°	C
Arsenic	2.2 E-05 <sup>d</sup>	A
Barium	1.7 E-04 <sup>c</sup>	С
Beryllium	1.1 E-06 <sup>e</sup>	В
Cadmium	4.1 E-06 <sup>f</sup>	A
Chromium, total	2.1 E-05 <sup>g</sup>	A
Chromium, hexavalent	3.5 E-06 <sup>h</sup>	С
Cobalt	6.5 E-06 <sup>i</sup>	С
Copper	4.9 E-05 <sup>g</sup>	A
Iron	9.9 E-04 <sup>k</sup>	C
Lead	4.8 E-05 <sup>1</sup>	A
Manganese	1.6 E-03 <sup>d</sup>	A
Mercury	3.5 E-06 <sup>m</sup>	A
Molybdenum	2.1 E-06°	D
Nickel	3.3 E-05 <sup>n</sup>	A
Phosphorus	2.7 E-05°	D
Potassium	3.9 E-02°	D
Selenium	2.8 E-06°	A
Silver	1.7 E-03 <sup>p</sup>	D
Sodium	3.6 E-04 <sup>c</sup>	D
Strontium	1.0 E-05°	D
Tin	2.3 E-05°	D
Titanium	2.0 E-05°	D
Vanadium	9.8 E-07°	D
Yttrium	3.0 E-07°	D
Zinc	4.2 E-04°	A

units of lb of pollutant/million Btu (MMBtu) of heat input. To convert from lb/MMBtu to lb/ton, multiply by (HHV \* 2000), where HHV is the higher heating value of the fuel, MMBtu/lb. To convert lb/MMBtu to kg/J, multiply by 4.3E-10. These factors apply to Source Classification Codes (SCC) 1-0X-009-YY, where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional, and where Y = 01 for bark-fired boiler, 02 for bark and wet wood-fired boiler, 03 for wet wood-fired boiler, and 08 for dry wood-fired boiler.

<sup>&</sup>lt;sup>b</sup> Factors are for boilers with no controls or with particulate matter controls.

c Reference 26.

d References 26, 33, 36, 46, 59, 60, 65, 71-73, 75, 81.

<sup>&</sup>lt;sup>e</sup> References 26, 35, 36, 46, 59, 60, 65, 71-73, 75.

References 26, 35, 36, 42, 46, 59, 60, 65, 71-73, 75, 81.

g References 26, 34, 35, 36, 42, 59, 60, 65, 71-73, 75, 81.

h References 26, 36, 46, 59, 60, 71, 72, 73, 75.

<sup>&</sup>lt;sup>i</sup> References 26, 34, 83.

<sup>&</sup>lt;sup>j</sup> References 26, 33-36, 46, 59, 60, 65, 71-73, 75, 81.

<sup>&</sup>lt;sup>k</sup> References 26, 71, 72, 81.

<sup>&</sup>lt;sup>1</sup> References 26, 33-36, 46, 59, 60, 65, 71-73, 75.

<sup>&</sup>lt;sup>m</sup> References 26, 35, 36, 46, 59, 60, 65, 71-73, 75, 81.

<sup>&</sup>lt;sup>n</sup> References 26, 33 - 36, 46, 59, 60, 65, 71-73, 75, 81.

References 26, 33, 35, 46, 59, 60, 65, 71-73, 75, 81.

P Reference 34.

## Table 1.6-5. CUMULATIVE PARTICLE SIZE DISTRIBUTION AND SIZE-SPECIFIC EMISSION FACTORS FOR WOOD/BARK-FIRED BOILERS<sup>a</sup>

## EMISSION FACTOR RATING: E

		C	umulative Mass % ≤ Stated S	Size						
			Controlled							
Particle Size <sup>b</sup> (µm)	Uncontrolled <sup>c</sup>	Multiple Cyclone <sup>d</sup>	Multiple Cyclone <sup>e</sup>	Scrubber <sup>f</sup>	Dry Electrostatic Granular Filter (DEGF)					
15	94	96	35	98	77					
10	90	91	32	98	74					
6	86	80	27	98	69					
2.5	76	54	16	98	65					
1.25	69	30	8	96	61					
1.00	67	24	6	95	58					
0.625	ND	16	3	ND	51					
Total	100	100	100	100	100					

<sup>&</sup>lt;sup>a</sup> Reference 89.

Expressed as aerodynamic equivalent diameter.
 From data on underfeed stokers. May also be used as size distribution for wood-fired boilers.
 From data on spreader stokers with flyash reinjection.
 From data on spreader stokers without flyash reinjection.
 From data on Dutch ovens. Assumed control efficiency is 94%.

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EF Reference	F	PM <sup>2</sup>	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>	Units
No.	Emissions Generating Activity <sup>1</sup>	EF	% of PM	EF	% of PM	EF	Units
1, 2, 3, 4	Log Bucking <sup>3</sup>	0.035	50	0.0175	25	0.00875	lb/ton log
1, 2, 3, 5	Log Debarking <sup>3</sup>	0.024	50	0.012	25	0.006	lb/ton log
1, 2, 3, 6	Sawing <sup>3</sup>	0.350	50	0.175	25	0.0875	lb/ton log
1, 3, 7	Lumber Drying - Resinous Softwood Species <sup>4</sup>	0.02	100	0.02	100	0.02	lb/mbf
1, 3, 7	Lumber Drying - Non-Resinous Softwood Species <sup>5</sup>	0.05	100	0.05	100	0.05	lb/mbf
1, 2, 3, 8	"Drop" of "wet" material <sup>5</sup> from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."	0.00075	N/A	0.00035	N/A	0.00005	lb/bdt material
1, 2, 3, 8	"Drop" of "dry" material <sup>5</sup> from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop."	0.0015	N/A	0.0007	N/A	0.0001	lb/bdt material
1, 3, 9	Pneumatically convey material <sup>6</sup> through medium efficiency cyclone to bin	0.5	85	0.425	50	0.25	lb/bdt material
1, 3, 9	Pneumatically convey material <sup>6</sup> through high efficiency cyclone to bin	0.2	95	0.19	80	0.16	lb/bdt material
1, 3, 9	Pneumatically convey material <sup>6</sup> through cyclone to bin. Exhaust routed through baghouse.	0.001	99.5	0.000995	99	0.00099	lb/bdt material
1, 3, 9	Pneumatically convey material <sup>6</sup> into target box	0.1	85	0.085	50	0.05	lb/bdt material
1, 2, 10	Wind Erosion of Pile	0.38	50	0.19	25	0.095	ton/acre-yr
1, 2, 11	Paved Roads			on site-specific	•		lb/VMT
1, 2, 12	Unpaved Roads	Emission fact	tors based up	on site-specifi	c parameters.		lb/VMT

#### Acronyms

bdt: bone dry ton

mbf: 1000 board foot lumber

VMT: vehicle mile traveled

- If any activity occurs within a building, reduce the PM, PM<sub>10</sub> and PM<sub>2.5</sub> emission factor ("EF") by 100 percent (engineering judgement) as emissions struggle to escape through doorways and other openings. If an activity's by-products are evacuated pneumatically to a target box, cyclone or bag filter system, then only the associated downstream conveyance emissions are counted.
- <sup>2</sup> PM refers to the CAA § 111 pollutant generally measured using EPA Reference Method 5 to determine the filterable fraction of particulate matter. "Particulate matter" is a term used to define an air pollutant that consists of a mixture of solid particles and liquid droplets found in the ambient air. PM does not include a condensable fraction.
- <sup>3</sup> EF for log bucking, debarking and sawing are expressed in units of "lb/ton log" in the table above. The EF can be expressed in units of "lb/mbf" lumber as follows:

lb/mbf = (lb PM/ton log) X (ton/2000 lb) X (LD lb/ft<sup>3</sup>) X (LRF bf lumber/ft<sup>3</sup> log) X (1000 bf/mbf)

where "LD" stands for log density and "LRF" stands for log recovery factor

- LD values are species-specific and are provided by The Engineering ToolBox and are listed at http://www.engineeringtoolbox.com/weigt-wood-d\_821.html
- LRF value of 6.33 bf/ft<sup>3</sup> log is specific to softwood species of the Pacific Coast East. See Section 2 of Appendix D to Forest Products Measurements and Conversion Factors with Special Emphasis on the U.S. Pacific Northwest. College of Forest Resources, University of Washington. 1994. See http://www.ruraltech.org/projects/conversions/briggs\_conversions/briggs\_append2/appendix02\_combined.pdf
- <sup>4</sup> Douglas Fir, Engelmann Spruce, Larch, Lodgepole Pine, Ponderosa Pine and Western White Pine
- <sup>5</sup> White Fir, Western Hemlock and Western Red Cedar
- <sup>6</sup> The "material" in this entry refers to bark, hogged fuel, green chips, dry chips, green sawdust, dry sawdust, shavings and any other woody by-product of lumber production.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

# SECTOR POLICIES AND PROGRAMS DIVISION OFFICE OF AIR QUALITY PLANNING AND STANDARDS OFFICE OF AIR AND RADIATION

DATE: September 22, 2017

SUBJECT: Development of a Provisional Emissions Calculations Tool for Inclusion in the

Final PCWP ICR

FROM: EPA/OAR/OAQPS/SPPD/NRG

TO: EPA-HQ-OAR-2016-0243

## I. Introduction

The U.S. EPA is required under Clean Air Act sections 112(f)(2) and 112(d)(6) to perform a residual risk and technology review (RTR) of the Plywood and Composite Wood Products (PCWP) National Emission Standards for Hazardous Air Pollutants (NESHAP) codified in 40 CFR part 63, subpart DDDD. In order to conduct the data analyses required for the RTR, the EPA is conducting an Information Collection Request (ICR) to gather information from the PCWP industry. As part of the ICR, facilities are asked to compile a HAP emissions inventory that will be used in the EPA's residual risk modeling. The EPA will review the file for quality assurance (QA) and standardization. The EPA has included a Provisional Calculation Tool within the PCWP ICR spreadsheet in order to address stakeholder concerns regarding the level of effort (burden) required to develop the HAP emissions inventory as part of the ICR response. Some stakeholders have indicated that many facilities do not maintain HAP emissions inventories, and therefore, considerable effort will be required to develop the inventory required for the ICR. The goal of the developing the provisional calculations is to reduce respondent burden.

Instructions for use of the Provisional Calculation Tool are provided in the ICR instruction document accompanying the draft ICR spreadsheet (PCWP\_survey.xlsx). The provisional calculations are built into the *HAP Emissions* tab of the ICR spreadsheet. Because use of the provisional calculations is optional, the columns and instructions pertaining to the Provisional Calculation Tool can be ignored by facilities not using the tool.

The purpose of this memorandum is to document the emission factors used in the Provisional Calculation Tool. Section II provides an overview of the PCWP Source Classification Codes (SCCs) and discusses the selection of emission factors for organic and metal HAP. Appendices to this memorandum list the SCCs and pollutants with emission factors included in the Provisional Calculation Tool.

	1	1	1	1	1			1		1		1
				Related AP-42 EF to use in								
			ICR Process Unit	absense of more								Propion
PCWP	scc	SCC Level Four	Туре	represetnative data	EF source	EF units	Acetaldehyde	Acrolein	Formaldehyde	Methanol	Phenol	aldehyde
		Press: Non-Urea	-77-				, , , , , , , , , , , , , , , , , , , ,		, , , , , , , , , , , , , , , , , , , ,			,
		Formaldehyde Resin:	Hardwood plywood									
plywood	30700784	Hardwood	press		No EF for SCC							
p.y.vood	30700701	Press: Urea Formaldehyde	Hardwood plywood	Hardwood Plywood, press, UF	AP-42, Ch							
plywood	30700785	Resin: Hardwood	press	resin	10.5	lb/MSF 3/8			0.0047	0.032	0.011	
piyirood	30700703	The sum that a wood	p. 633	SPW dry trim chipper (chips	10.5	.5,5. 5, 5			0.00 17	0.002	0.011	
				dry trim from SPW panel saws;								
		Hammermill/Chipper: Dry		process rate = finished board	AP-42, Ch							
plywood	30700791	Wood Material	Panel trim chipper	production)	10.5	lb/MSF 3/8				0.0078		
prywood	30700731	Miscellaneous Coating	Miscellaneous	productiony	10.5	15/11/31 3/6				0.0070		
plywood	30700794	Operations	coating operation		No EF for SCC							
prywood	30700734	Орегилона	coating operation		NO ET TOT SEC							
plywood	30700799	Other Not Classified	Other		No EF for SCC							
P1711000	30700733	Lumber Kiln: Indirect-	Carci		21 101 300			<del>                                     </del>		<del> </del>	<b> </b>	<del>                                     </del>
		heated: Softwood: Pine	1					1				
lumber	30700841		Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.016	0.18	0.01	0.004
idilibei	30/00041	Lumber Kiln: Indirect-	LUTINET KITT		INCASI 2014	וטן ועוטר	0.04	0.004	0.016	0.10	0.01	0.004
		heated: Softwood: Non-										
lumber	20700943	Pine Species	Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.016	0.18	0.01	0.004
lumber	30700842	Lumber Kiln: Indirect-	Lumber kiin		NCASI 2014	ID/IVIBE	0.04	0.004	0.010	0.10	0.01	0.004
lumber	20700943	heated: Hardwood	Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.016	0.18	0.01	0.004
lumber	30700843	neated: nardwood	Lumber kiin		NCASI 2014	ID/IVIBE	0.04	0.004	0.010	0.10	0.01	0.004
		Lunch on Kilou Dine et fine du										
lumbar	20700944	Lumber Kiln: Direct-fired:	Lumbarkila		NICASI 2014	Ib /NADE	0.04	0.004	0.065	0.10	0.01	0.004
lumber	30700844	Softwood: Pine Species	Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.065	0.18	0.01	0.004
		Lumber Kiln: Direct-fired:										
	20700045	Softwood: Non-Pine	1		NICACI 2044	U. /AADE	0.04	0.004	0.005	0.40	0.04	0.004
lumber	30700845		Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.065	0.18	0.01	0.004
l		Lumber Kiln: Direct-fired:								0.40		
lumber	30700846	Hardwood	Lumber kiln		NCASI 2014	lb/MBF	0.04	0.004	0.065	0.18	0.01	0.004
		Pressurized										
		Refiner/Primary Tube										
		Dryer: Direct Natural Gas-		l								
		fired: Blowline Blend: Non-		MDF, tube, direct wood-fired,	AP-42, Ch							
MDF	30700909		Primary tube dryer	blowline blend, UF, softwood	10.6.3	lb/ODT			0.86			
		Pressurized										
		Refiner/Primary Tube										
		Dryer: Direct Natural Gas-										
		fired: Blowline Blend: Non-		MDF, tube, direct wood-fired,	AP-42, Ch							
MDF	30700910	Urea Formaldehyde Resin:	Primary tube dryer	blowline blend, UF, softwood	10.6.3	lb/ODT			0.86			
		Pressurized										
		Refiner/Primary Tube										
		Dryer: Direct Natural Gas-	1					1				
		fired: Blowline Blend: Non-	1					1				
		Urea Formaldehyde Resin:	1	MDF, tube, direct wood-fired,	AP-42, Ch			1				
MDF	30700911		Primary tube dryer	blowline blend, UF, softwood	10.6.3	lb/ODT		ļ	0.86			ļ
		Pressurized	1					1				
		Refiner/Primary Tube	1					1				
		Dryer: Direct Natural Gas-	1					1				
		fired: Blowline Blend: Urea	1	MDF, tube, direct wood-fired,	AP-42, Ch			1				
MDF	30700912	Formaldehyde Resin:	Primary tube dryer	blowline blend, UF, softwood	10.6.3	lb/ODT		<u> </u>	0.86		<u> </u>	<u> </u>

	Southern Yellow I	vised, references Pine Emission Fac F is 1000 board fee	ctors
	emission	ı factor, pounds pe	r MBF
		Suspension	
	Steam heated	burner	Gasifier
PM	0.022 (1)	0.40 (2)	0.14 (3)
PM <sub>10</sub>	_		
VOC	-		
as carbon	3.61 (4)	3.83 (5)	3.83 (5)
as VOC (pinene)	4.09	4.34	4.34
Methanol	0.199 (6)	0.161 (7)	0.161 (7)
Phenol	0.01(8)	0.01 (8)	0.01 (8)
Formaldehyde	0.0183 (9)	0.103 (10)	0.103 (10)
Acetaldehyde (11)	0.052	0.052	0.052
Acrolein (12)	0.0075	0.0075	0.0075
. ,		•	•
	emission fa	ctor, pounds per M	/IBF-hour
		Suspension	
	Steam heated	burner	Gasifier
Acetaldehyde	0.00377 (13)	0.00377	0.00377
Acrolein	0.00051 (14)	0.00051	0.00051
formaldehyde	0.0014 (15)	0.01185 (16)	0.01185 (16)
or TAPs, the emission 1000 board feet)* ( 40,000 BF kiln charg			(Charge Example: )*(0.00140) =

Note: The full scale direct fired kiln has a blend box that mixes hot air from the sawdust combustion with cooler recycled air from the kiln. Although the small scale kilns reported data under "direct fire" this only means that the temperature profiles of the kilns matched that of a full scale kiln. There was no intermingling of hot combustion gases with cooler recycle air from the small kilns since these kilns are electrically heated.

#### REFERENCES

(1)

PRODUCT	FIRING TYPE	UNITS/		RAN	GE	MEDIAN	MEAN	UNITS
		RUNS	DETECTS					
Southern Pine Lumber	Steam Heated	3/3/16	0/16 nd	2.0E-03 to	1.7E-01	9.3E-03	2.2E-02	lb/MBF
Southern Pine Lumber	Direct Fired	6/7/24	0/24 nd	2.3E-02 to	1.3E+00	3.2E-01	3.7E-01	lb/MBF

(2) personal Communication, D Word, NCASI, May 31, 2005

Suspension Burner	Run	M 5 lb/MBF	Production	Cycle time, hrs
1K181	1	0.4170	133	20.3
1K181	2	0.3480	133	20.3
1K181	1	0.4800	131	20
1K181	2	0.4100	131	20
1K181	3	0.3600	131	20
		0.40	131 80	20 12

(3) personal Communication, D Word, NCASI, May 31, 2005

Kiln 098 DF		M 5		Cycle
Gasifier	Run	lb/MBF	Production	time, hrs
1K098	1	0.2670	130	26.45
1K098	2	0.2010	130	26.45
1K098	3	0.2260	130	26.45
2K098	1	0.1520	128	17.52
2K098	2	0.1810	128	17.52
2K098	3	0.0980	128	17.52
2K098	1	0.0640	104.5	17.25
2K098	2	0.0548	104.5	17.25
2K098	3	0.0466	104.5	17.25
		0.143	120.83	20.41

- (4) NCASI Technical Bulletin 845 Table 8.2 Steam heated average of all kilns
- (5) NCASI Technical Bulletin 845 Table 8.1 Direct fired (gasifier) full scale kiln only
- (6) NCASI Technical Bulletin 845 Table 9.6 Steam heated all kilns
- (7) NCASI Technical Bulletin 845 Table 9.4 Direct fired (gasifier) full scale kiln
- (8) Table 2A to Appendix B Emission factors for Plywood and Composite Wood Product MACT (Subpart DDDD)
- (9) NCASI Technical Bulletin 845 Table 9.5 steam heated full scale kiln and OSU small scale runs. MSU not used. See spreadsheet tab for statistical test
- (10) NCASI Technical Bulletin 845 Table 9.3 Direct fired full scale kiln only
- (11) NCASI Technical Bulletin 845 Appendix BB6 FSK INDF3 and BB7 OSU INDF3
- (12) NCASI Technical Bulletin 845 Appendix BB6 FSK INDF3 and BB7 OSU INDF3
- (13) NCASI Technical Bulletin 845 Appendix BB6 FSK INDF3 run # 10 and BB7 OSU INDF3 Run # 2  $\,$
- (14) NCASI Technical Bulletin 845 Appendix BB6 FSK INDF3 run # 10 and BB7 OSU INDF3 Run # 2
- (15) NCASI Technical Bulletin 845 Appendix Y7 FSK INDF1 run # 9, BB6 FSK INDF3 run # 10, App Y9 OSU INDF1 run # 4, BB7 OSU INDF3 run # 5
- (16) NCASI Technical Bulletin 845 Appendix Y1 FSK DF2 run # 6, Y2 FSK DF5 run # 6

# ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 624 Ridgewood Road Ridgeland, Mississippi 39158 Phone: 601/856-3092 Fax 601/853-2151

# EXECUTIVE SUMMARY OF STACK EMISSIONS TEST

Anderson Tully – Waltersville Mill

Report date: May 27, 2014

On April 24, 2014, Environmental Monitoring Laboratories performed air emissions tests for Anderson Tully Company in Vicksburg, Mississippi. Testing was performed to measure particulate, CO, NOx, VOC and SO<sub>2</sub> emissions from the Wellons wood fired boiler in accordance with requirements of the Title V Permit No. 2780-00004 issued and administered by the Mississippi Department of Environmental Quality (MDEQ). The following table is a summary of the test results.

	lb/hr	lb/MM Btu	conc.	Permit Limit
PARTICULATE EMISSIONS	23.32	0.329	0.152 gr/dscf	45.6 lb/hr 0.30 grains/dscf
SO <sub>2</sub> EMISSIONS	0.17	0.002	0.9 ppm	2.3 lb/hr 4.8 lb/MM Btu
CO EMISSIONS	4.01	0.056	51 ppm	23.2 lb/hr
NOx EMISSIONS	15.61	0.220	122 ppm	30 lb/hr
VOC EMISSIONS (as C)	0.24	0.003	7 ppm	8.0 lb/hr

Ms Kamace Priest of Anderson Tully Company coordinated the testing project. Bill Norwood, Wesley Ballard, Greg Shelnutt, and Eric Renfrow of Environmental Monitoring Laboratories were responsible for sample collection.

# ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 624 Ridgewood Road Ridgeland, Mississippi 39158 Phone: 601/856-3092 Fax 601/853-2151

## EXECUTIVE SUMMARY OF STACK EMISSIONS TEST

Anderson Tully – Waltersville Mill

Report date: May 14, 2016

On April 7, 2016, Environmental Monitoring Laboratories performed air emissions tests for Anderson Tully Company in Vicksburg, Mississippi. Testing was performed to measure particulate, CO, NOx, VOC, SO<sub>2</sub> and visible emissions from the Wellons wood fired boiler in accordance with requirements of the Title V Permit No. 2780-00004 issued and administered by the Mississippi Department of Environmental Quality (MDEQ). The following table is a summary of the test results.

	lb/hr	lb/MM Btu	conc.	Permit Limit
PARTICULATE EMISSIONS	18.56	0.313	0.118 gr/dscf	45.6 lb/hr 0.30 grains/dscf
SO <sub>2</sub> EMISSIONS	0.10	0.0017	0.5 ppm	2.3 lb/hr 4.8 lb/MM Btu
CO EMISSIONS	14.04	0.232	176 ppm	23.2 lb/hr
NOx EMISSIONS	11.08	0.188	85 ppm	30 lb/hr
VOC EMISSIONS (as C)	0.21	0.003	6 ppm	8.0 lb/hr

Ms Kamace Priest of Anderson Tully Company coordinated the testing project. Bill Norwood, Wesley Ballard, and Eric Renfrow of Environmental Monitoring Laboratories were responsible for sample collection.

# ENVIRONMENTAL MONITORING LABORATORIES, INC.

P.O. Box 655 624 Ridgewood Road Ridgeland, Mississippi 39158 Phone: 601/856-3092 Fax 601/853-2151

#### EXECUTIVE SUMMARY OF AIR EMISSIONS TESTS

Anderson Tully Company - Waltersville Mill

Report date: April 24, 2018

Subject: Anderson Tully Company - Vicksburg, Mississippi

Facility No. 2780-00004

On April 9, 2018, Environmental Monitoring Laboratories performed air emissions testing for Anderson Tully Company in Vicksburg, Mississippi. Testing was performed to measure particulate, CO, NOx, VOC, SO<sub>2</sub> and visible emissions from the Wellons wood fired boiler in accordance with requirements of Permit No. 2780-00004 issued and administered by the Mississippi Department of Environmental Quality.

#### Results of the tests:

	lb/hr	lb/MMBTU	concentration	Permit Limit
PARTICULATE EMISSIONS	15.04	0.241	0.102 gr/dscf	45.6 lbs/hr 0.30 gr/dscf
SO <sub>2</sub> EMISSIONS	0.05	0.0008	0.30 ppm	2.3 lb/hr 4.8 lb/MMBTU
CO EMISSIONS	7.31	0.117	98 ppm	23.2 lb/hr
NO <sub>x</sub> EMISSIONS	12.11	0.193	99 ppm	30 lb/hr
VOC EMISSIONS (as C)	0.05	0.001	1.4 ppm	8.0 lb/hr

VISIBLE EMISSIONS, highest Six Minute Avg. (SMA)	10.0 %	40 %
VISIBLE LIVISSIONS, Ingliest SIX Williate Avg. (SWIA)	10.0 /0	40 /0

Ms. Kamace Priest coordinated the testing project. Otis Rayburn, Greg Shelnutt, Wesley Ballard and Eric Renfrow of Environmental Monitoring Laboratories were responsible for sample collection.

P.O. Box 655 624 Ridgewood Road Ridgeland, Mississippi 39158 Phone: 601/856-3092

## **EXECUTIVE SUMMARY OF AIR EMISSIONS TESTS**

Vicksburg Forest Products - Watersville Mill

Report date: March 31, 2020

Subject: Vicksburg Forest Products - Vicksburg, Mississippi

Facility No. 2780-00004

On March 19, 2020, EML, LLC performed air emissions testing for Vicksburg Forest Products in Vicksburg, Mississippi. Testing was performed to measure particulate, CO, NOx, VOC, SO<sub>2</sub> and visible emissions from the Wellons wood fired boiler in accordance with requirements of Permit No. 2780-00004 issued and administered by the Mississippi Department of Environmental Quality.

#### Results of the tests:

	lb/hr	lb/mmBTU	conc.	Permit Limit
PARTICULATE EMISSIONS	13.02	0.270	0.106 gr/dscf	45.6 lbs/hr 0.30 gr/dscf
SO <sub>2</sub> EMISSIONS	0.51	0.0108	3.6 ppm	2.3 lb/hr 4.8 lb/mmBTU
CO EMISSIONS	12.46	0.261	199 ppm	23.2 lb/hr
NO <sub>x</sub> EMISSIONS	10.05	0.211	98 ppm	30.0 lb/hr
VOC EMISSIONS (as C)	0.01	0.0001	0.3 ppm	8.0 lb/hr
VISIBLE EMISSIONS, HSMA	-	-	5.0 %	40 %

Chris Barnett coordinated the testing project. Greg Shelnutt, Josh Alford, Andy Gatlin and Josh Laxer of EML, LLC were responsible for sample collection.

# Appendix D

Baseline Reference

Warren Co. Anderson Tully Lumber Co. AI 1536

2016

(2015 Actual Emissions)



## Certified No. 7015 1520 0002 6306 3627 Return Receipt Requested

June 22, 2016

Ms. Krystal Rudolph Mississippi Department of Environmental Quality Air Division P. O. Box 2261 Jackson, Mississippi 39225-2261 RECEIVED
JUN 2 4 2016
Dept. of Environmental Quality

Re: Anderson-Tully Lumber Company

Vicksburg, Mississippi

Title V 2015 Emissions Inventory

Facility No. 278000004 - Warren County

Dear Ms. Rudolph,

Please find enclosed the 2015 Annual Emissions Reporting Form (AERF) and emissions calculations for purposes of assessing the Title V Operating Permit Fee for the Anderson-Tully Lumber Company Vicksburg, Mississippi.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

If you have any questions or need any additional information, please call Andrew S. Covington at (601) 696-7146 or by email at acovington@allenes.com.

Sincerely,

Kamace Priest

ramace fuest

Director of Risk Management

CC: Andrew S. Covington, P.E. - Allen Engineering and Science

Enclosures

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY TITLE V PROGRAM ANNUAL EMISSIONS REPORTING FORM P.O. BOX 2261 JACKSON, MS 39225-2261

In accordance with Section 49-17-32, Mississippi Code of 1972 Annotated, all sources that choose to base their annual Title V Fee on actual emissions shall submit, by July 1 of each year, an inventory of emissions for the previous calendar year.

## MDEQ Facility ID #:278000004 AI ID: 1536

Facility:

Anderson Tully Lumber Company, Waltersville Lumber Mill

Site Address:

1725 North Washington Street

Vicksburg, MS 39180

Warren County

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 2015. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	FOR INFO ONLY Actual Emission Rate (TPY) Reported for Calendar Year (2014)	Actual Annual (2015) Emission Rate (TPY)
Particulate Matter	740.84	142.94	111.86
Sulfur Dioxide	49.17	0.59	0.48
Nitrogen oxides	174.11	65.33	52.83
Carbon Monoxide	119.85	16.63	13.45
VOC	119.90	13.22	25.71
Total reduced sulfur compounds	0	0	0.0
Lead	0	0.48	0.39
CFC/HCFC, Total	0	0	0.0
Other	0	0	0.0
HAP, Total (VOC)	27.871	10.03	14.98
HAP, Total (NON VOC)	8.884	0.75	0.91

VOC Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Date
Director of Risk Management

# ANNUAL EMISSIONS REPORTING FORM

## PREPARED FOR:

Anderson Tully Lumber Company Waltersville Lumber Mill Facility ID # 2780-00004

1725 North Washington Street Vicksburg, Mississippi 39180 Warren County

RECEIVED JUN 2 4 2016

Dept. of Environmental Quality

## PREPARED BY:





## Wellons Wood Fired Boiler

Parameter	Annual Emissions (ton/year)
PMfilterable	79.00
NO <sub>x</sub>	52.83
SO <sub>2</sub>	0.48
VOC	0.72
CO	13.45
Total HAPs	1.61
HAP, Total (VOC)	0.71
HAP, Total (non-VOC)	0.91
Chlorine / Hydrochloric Acid	0.05

## **Products of Wood Residue Combustion**

Pollutants emissions for CO, NO<sub>x</sub>, SO<sub>2</sub>, PM and VOC were calculated using stack test results from April 7, 2016 and HAPs were calculated using stack test results from July 30, 2012.

## January 1 - December 31, 2015

Steam enthalpy	997.30	BTU/lb steam
Hours of Operation	8,112.00	hr/period
Boiler Efficiency	90	percent
Heat input	480,230.40	MMBtu/period
Average Heat Input	59.20	MMBtu/hr

## **Emission Calculations:**

Pollutant	Average Heat Input	Hourly Emissions Rate	Emissions		
	MMBtu/hr	lb/MMBtu	lb/yr	ton/yr	lb/hr
PMfilterable	59.20	0.329	157,95.80	79.00	19.48
NOx	59.20	0.220	105,650.69	52.83	13.02
SO <sub>2</sub>	59.20	0.002	960.46	0.48	0.12
VOC	59.20	0.003	1,440.69	0.72	0.18
co	59.20	0.056	26,892.90	13.45	3.32



## Hazardous Air Pollutants<sup>1</sup>

	lb/MM8tu	Adjusted lb/MMBtu <sup>2</sup>	lb/yr	ton/yr	lb/hour
Acetaldehyde	8.30E-04	1.41E-04	6.78E+01	3.39E-02	8.35E-03
Acetophenone	3.20E-09	5.44E-10	2.61E-04	1.31E-07	3.22E-08
Acrolein	4.00E-03	6.80E-04	3.27E+02	1.63E-01	4.03E-02
Antimony	7.90E-06	1.34E-06	6.45E-01	3.22E-04	7.95E-05
Arsenic <sup>3</sup>	9.37E-06	9.37E-06	4.50E+00	2.25E-03	5.55E-04
Benzene	4.20E-03	7.14E-04	3.43E+02	1.71E-01	4.23E-02
Beryllium <sup>3</sup>	1.04E-07	1.04E-07	4.99E-02	2.50E-05	6.16E-06
Bis(2-ethylehexyl)phthalate	4.70E-08	7.99E-09	3.84E-03	1.92E-06	4.73E-07
Bromomethane	1.50E-05	2.55E-06	1.22E+00	6.12E-04	1.51E-04
Cadmium <sup>3</sup>	3.20E-05	3.20E-05	1.54E+01	7.68E-03	1.89E-03
Carbon Tetrachloride	4.50E-05	7.65E-06	3.67E+00	1.84E-03	4.53E-04
Chlorine <sup>3</sup>	1.00E-04	1.00E-04	4.80E+01	2.40E-02	5.92E-03
Chlorobenzene	3.30E-05	5.61E-06	2.69E+00	1.35E-03	3.32E-04
Chloroform	2.80E-05	4.76E-06	2.29E+00	1.14E-03	2.82E-04
Chromium, total <sup>3</sup>	4.16E-05	4.16E-05	2.00E+01	9.99E-03	2.46E-03
Cobalt	6.50E-06	1.11E-06	5.31E-01	2.65E-04	6.54E-05
2,4-Dinitrophenol	1.80E-07	3.06E-08	1.47E-02	7.35E-06	1.81E-06
Ethyl Benzene	3.10E-05	5.27E-06	2.53E+00	1.27E-03	3.12E-04
Formaldehyde	4.40E-03	7.48E-04	3.59E+02	1.80E-01	4.43E-02
Hydrochloric Acid <sup>3</sup>	1.00E-04	1.00E-04	4.80E+01	2.40E-02	5.92E-03
Lead <sup>3</sup>	1.62E-03	1.62E-03	7.78E+02	3.89E-01	9.59E-02
Manganese <sup>3</sup>	1.60E-03	1.60E-03	7.68E+02	3.84E-01	9.47E-02
Mercury <sup>3</sup>	5.52E-07	5.52E-07	2.65E-01	1.33E-04	3.27E-05
Naphthalene	9.70E-05	1.65E-05	7.92E+00	3.96E-03	9.76E-04
Nickel <sup>3</sup>	1.16E-04	1.16E-04	5.57E+01	2.79E-02	6.87E-03
4-Nitrophenol	1.10E-07	1.87E-08	8.98E-03	4.49E-06	1.11E-06
Pentachlorophenol	5.10E-08	8.67E-09	4.16E-03	2.08E-06	5.13E-07
Phenoi	5.10E-05	8.67E-06	4.16E+00	2.08E-03	5.13E-04
Propionaldehyde	6.10E-05	1.04E-05	4.98E+00	2.49E-03	6.14E-04
Selenium <sup>3</sup>	3.65E-05	3.65E-05	1.75E+01	8.76E-03	2.16E-03
Styrene	1.90E-03	3.23E-04	1.55E+02	7.76E-02	1.91E-02
2,3,7,8-Tetrachloro dibenzo-p- dioxins	8.60E-12	1,46E-12	7.02E-07	3.51E-10	8.66E-11
Toluene	9.20E-04	1.56E-04	7.51E+01	3.76E-02	9.26E-03
2,4,6-Trichlorophenol	2.20E-08	3.74E-09	1.80E-03	8.98E-07	2.21E-07
Trichloroethene	3.00E-05	5.10E-06	2.45E+00	1.22E-03	3.02E-04
Vinyl Chloride	1.80E-05	3.06E-06	1.47E+00	7.35E-04	1.81E-04
o-Xylene	2.50E-05	4.25E-06	2.04E+00	1.02E-03	2.52E-04
Polycyclic Organic Matter (POM)	7.90E-05	1.34E-05	6.45E+00	3.22E-03	7.95E-04
Total HAPs, VOC			1.41E+03	7.05E-01	1.68E-01
Total HAPs, non-VOC			1.82E+03	9.09E-01	2.17E-01
Total HAPs			3227.227329	1.6136137	3.85E-01

- 1. List of hazardous air pollutants are provided in http://www.epa.gov/ttn/atw/188polls.html
- 2. Table 1.6-3 of AP-42 (dated 9/03), has a VOC emission factor of 0.017 lb/MMBTU. In the table above this emission factor of 0.017 lb/MMBtu has been adjusted based on average of stack test result which is 0.003 lb/MMBtu. (Ratio = 0.003/0.017 = 0.17)
- 3. From July 2012 Stack Test



## Cleaver Brooks Backup Boiler

There are no reportable emissions from AA-003 since the backup boiler was not operated in 2015.

Rated Capacity Maximum Hours of Operation 29.29 MMBtu/hr 0 hr/year



## Portable Boiler

There are no reportable emissions from AA-004 since the portable boiler was not operated in 2015.

Rated Capacity Maximum Hours of Operation 65 MMBtu/hr 0 hr/year



## Log Debarking

Log volume received in 2015:	27,428,193	board feet
1 truck load carries approximately:	3,500	board feet
No. of trucks in a year =	27,428,193/3500	Trucks/year
	7,837	Trucks/year
In Mississippi, approximate truck weight:	28	Tons/truck
Total amount of wood received in 2014 =	219,436	tons/year
	438,872,000	lbs/year

Emissions calculated using AP-42 Log Debarking emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4<sup>th</sup> Edition, 10/80).

Emission Factor	0.024	lb PM <sub>10</sub> /ton logs
PM <sub>10</sub> =	5,266.46	lb PM <sub>10</sub> /year
	2.63	ton PM <sub>10</sub> /year

## Log Sawing

Log cross-sawed in 2015:	27,428,193	board feet
1 truck load carries approximately:	3,500	board feet
No. of trucks in a year =	27,428,193/3500	Trucks/year
	7,837	Trucks/year
In Mississippi, approximate truck weight:	28	Tons/truck
Total amount of wood received in 2014 =	219,436	tons/year
	438,872,000	lbs/year

Emissions calculated using AP-42 Log Debarking emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4<sup>th</sup> Edition, 10/80).

Emission Factor	0.024	lb PM <sub>10</sub> /ton logs
PM <sub>10</sub> =	5,266.46	lb PM <sub>10</sub> /year
	2.63	ton PM <sub>10</sub> /year

## Hog and Chipper

Emissions calculated using AP-42 emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4<sup>th</sup> Edition, 10/80). ATCO has historically used an emission factor equivalent to 10% of the published AP-42 factor based on good engineering judgment, experience and the assumption that 30% of the emissions are PM<sub>10</sub>.



## Bark Hog

otal amount of wood received in 2015 =	38,591	tons/year
Emission Factor	0.0105	lb PM <sub>10</sub> /ton logs
PM <sub>10</sub> =	405.21	lb PM <sub>10</sub> /year
	0.20	ton PM <sub>10</sub> /year
Mill Chipper		
Total amount of wood received in 2015 =	38,591	tons/year
Emission Factor	0.0105	Ib PM+o/ton logs

## **Tub Grinder**

PM10 =

Emissions calculated using AP-42 Log Sawdust handling emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

405.21 lb PM<sub>10</sub>/year 0.20 ton PM<sub>10</sub>/year

Total amount of wood waste handled in 2015 =	8,635	tons/year
Emission Factor	1.0	lb PM <sub>10</sub> /ton sawdust handled
PM <sub>10</sub> =	8,635.00	lb PM <sub>10</sub> /year
	4.32	ton PM <sub>10</sub> /year

Note: To calculate the total log debarking, sawing, and trimming for Particulate Matter used in Actual Emissions Summary, sum the numbers above.

2.63 ton PM<sub>10</sub>/year + 2.63 ton PM<sub>10</sub>/year + 0.20 ton PM<sub>10</sub>/year + 4.32 ton PM<sub>10</sub>/year = 9.98 Particulate Matter ton/year



## Fugitive In-Plant Road Dust

ATCO has historically used a default value of 1 lb PM/hr for insignificant activities to calculate the road dust emissions.

Total hours of operations for Wellons Boiler in 2015	8,112.00	Hours
Emission Factor	1.00	lb PM <sub>10</sub> /hr
PM <sub>10</sub> =	8,112.00	lb PM <sub>10</sub> /year
	4.06	ton PM <sub>10</sub> /year



## **Lumber Treatment Station**

	Density	Usage*	VC	c	Glycol Ethers		Metha	anol	Total HAPs	
Material Name	lb/gal	Gallons	%	ton/yr	%	ton/yr	%	ton/yr	tons/yr	
Busan 1223	9.18	0.00	0	0.00	0	0.00	0	0.00	0.00	
Busperse 293	9.85	1925.00	0	0.00	0	0.00	0	0.00	0.00	
Busan 1249	7.88	0.00	0	0.00	0	0.00	0	0.00	0.00	
Busan 1009	9.01	2750.00	74	9.16	60	7.43	1.2	0.15	7.58	
TOTAL				9.16		7.43		0.15	7.58	

<sup>\*</sup>Quantities used in 2015.



## Lumber End Coat and Logo Color Coat Areas

Material Name	Density	Usage*	VO	C	Methanol		
	lb/gal	Gallons	%	ton/yr	%	ton/yr	
Anchorseal K	7.93	4950	0.00	0.00	0.00	0.00	
Anchorseal K (cold)	7.93	275	71.00	0.77	71.00	0.77	
Gempaint	9.18	1497.5	0.00	0.00	0.00	0.00	
Gempaint (cold)	9.18	1925	64.00	5.65	64.00	5.65	
Gempaint (PG)	9.18	1497.5	0.00	0.00	0.00	0.00	
TOTAL				6.42		6.42	

<sup>\*</sup>Quantities used in 2015.



## Inspection Station Planer Mill

Emissions calculated using May 14, 2004 stack test results of 0.077 lb PM<sub>10</sub> per hour.

The inspection station planer mill operated did not operate in 2015.



## **Power Plant Sales**

Emissions calculated using AP-42 Log Sawdust handling emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

Total amount of wood waste handled in 2015 = Emission Factor PM<sub>10</sub> = 35,916 tons/year 1.0 lb PM<sub>10</sub>/ton sawdust handled 35,916 lb PM<sub>10</sub>/year 17.96 ton PM<sub>10</sub>/year



### AK-001 028

## Drying Kilns

To reduce the moisture content of lumber, indirect steam heated drying kilns and air drying sheds are used. The VOC emissions from lumber kilns were tested by the National Council of Air and Stream Improvement (NCASI). The testing was conducted on pine and determined to be 5.88 lb VOC per thousand BF. Since ATCO dried hardwood, an emission factor of 10% of the pine lumber drying factor is used.

Kiln dried wood in 2015	30,500,215.00	Board foot
Emission Factor	0.59	Ib VOC/thousand BF
VOC =	17,995.13	lb VOC/year
	9.00	ton VOC/year

Two hazardous air pollutants, Methanol and Formaldehyde, are emitted during the kiln drying process.

Emission Factors:	0.016	lb Methanol/thousand BF
	0.002	lb Formaldehyde/thousand BF
HAP - Methanol	488.00	lb Methanol/year
	0.24	tons Methanol/year
HAP - Formaldehyde	61.00	lb Formaldehyde/year
W. C.	0.03	tons Formaldehyde/year

Note: HAPs, Total (VOC) for Drying Kilns used in the 2015 Actual Emissions Summary is a sum of 0.24 tons Methanol/year + 0.03 tons Formaldehyde/year, giving 0.27 tons/year.



#### IA-001

### Miscellaneous Activities

Insignificant Activities at ATCO include welding and storage tanks.

ATCO has historically used a default value of 1 lb PM/hr for insignificant activities to calculate emissions from welding and grinding operations. These activities are conducted for 3 hours a day, six days per week, and 52 weeks in 2015.

Hours of operation	936.00	hours
Emission Factor	1.00	Ib PM <sub>10</sub> /hour
PM <sub>10</sub> =	936.00	Ib PM <sub>10</sub> /year
	0.47	ton PM <sub>10</sub> /year

## Storage Tanks

This facility has one 2,000 gallon diesel storage tank (vertical) and one 940 gallon gasoline storage tank (horizontal) at the facility.

Note: The following information was input into EPA Tanks 4.09D software for calculation of the working and breathing losses from the two storage tanks. No calculations were run for the Waste Oil tank as the vapor pressure is too low to be of concern. However, Tanks 4.09 software is no longer supported by EPA. The total loss for 2015 was calculated by increasing emissions from 2014 by the same percent as amount of increase in fuel throughput.

There was a 7.5% increase in Diesel Fuel Throughput.

There was a 10% increase in Gasoline Throughput.

Tank ID	Diesel Fuel	Gasoline		
Tank Size (gals)	2,000	940		
Orientation	Vertical	Horizontal		
Annual Throughput (gals/year)	142,210	5,200		
Color	Silver	Silver		
		No. 2 Acres (March 1984)		
Working Loss (lbs/year)	2.39	407.89		
Breathing Loss (Ibs/year)	0.10	404.09		
Total Loss (lbs/year)	2.49	811.98		

Working loss: 2.22 (2014) x 1.075% = 2.39 lb/yr 370.81 (2014) x 1.10% = 407.89 lb/year Breathing loss: 0.09 (2014) x 1.075% = 0.10 lb/yr 367.35 (2014) x 1.10% = 404.09 lb/year Total Loss of 2.49 + 811.98 = 814.46 lbs/year = 0.41 tons/year

## SUMMARY: 2015 ACTUAL EMISSIONS

AIR F	POLLUTION SOURCES	Particula	te Matter	Sulfur	Dioxide	Nitroger	n Oxides	Carlson I	Monoxide	17772	Organic	Le	ead	HAPs, To	otal (VOC)	100000000000000000000000000000000000000	otal (non- OC)	Acid	d Gas	HAS	95, PM
ID	Description	lb/hour	ton/year	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	lb/hour	ton/yr	fb/hour	ton/yr
AA-001 (A)	Planer Mill	0.0770	0.0000	是,那是		EGRAN	133.65	<b>****</b>		14.		W. V.	1	2017年				THE WAY			1.000
AA-001 (C)	Grading and Lumber Inspection Station	0,0770	0.0680																		
AA-001 (D)	Fuel Storage Silos	0.0000	0.0000				ALC:	60 堂	.E		The Line	CES	REAL PROPERTY.	THE			1900	100000	100	3-0-0	
AA-001 (F)	Dry Boiler Feed Silos	0.0770	0.3300	(多)	la il a	Tally	with the		The same	X	11.21	1.00		少少产品			1250	100 4			
AA-002	Wellons Wood Waste Boiler	19.4800	79,0000	0.1200	0.4800	13,0200	52.8300	3,3200	13.4500	0.1800	0.7200	0.0960	0.3890	0,1680	0.7100	0.2170	0.9090	0.0142	0.0575	0.2028	0.8515
AA-003	Cleaver Brooks Boiler	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		THE STA	0.0000	0.0000	0.0000	0.0000	的問題		L. L. D.	17 公理
AA-004	Portable Emergency Boiler	0.0000	0,0000	0.0000	0,0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	0.0000				(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)
AA-006	Log debarking, sawing and trimming	2.2790	9.9800																		
AA-007	Fugitive In-plant Road Dust	1.0000	4.0600				THE STATE OF THE S				1 mar.										
AA-009	Lumber Treatment Station						, in			2.0913	9.1600		物学 (大学)	1.7306	7.5800	(A) (A)					
AA-010	Lumber End Coating		· 陈山山山		100	1925			Language and	3.0500	6.4200		F. Fall	1.4658	6.4200	1000	171	10-15 Ac	1 - 10/12	A STORY	<b>一种原</b>
AA-012	Inpection Station Planer Mill	0.0000	0.0000					W=													
AA-013	Power Plant Sales (truck loading)	4.0980	17.9500									虚型	u.s					- N			
AK-001 - AK- 028	Drying Kilns		链点。 磁素 Mi							2.0550	9,0000			0.0620	0.2700	No.					
IA-001	Insignificant Activities	1.0000	0.4700		300		(C)			0.0845	0.4100		為性學和		"""	13/4, 3				55400	
	Total	28.0880	111.8580	0.1200	0.4800	13.0200	52.8300	3.1200	13.4500	7,4609	25.7100	0.0960	0.3890	3.4263	14.9800	0.2170	0.9090	0.0142	0.0575	0.2028	0.8515

### 2015 ACTUAL ANNUAL EMISSIONS (TONS/YEAR)

Regulated Pollutant	AA-001	AA-002	AA-003	AA-004	AA-006	AA-007	AA-009	AA-010	AA-012	AA-013	AK-001 - AK028	Fugitives	TOTAL
Particulate Matter <sub>10</sub>	0.40	79.00	0.00	0.00	9.98	4.06	0.00	0.00	0.00	17.95	0.00	0.47	111.86
Sulfur Dioxide	0.00	0.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.48
Nitrogen Oxides	0.00	52.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	52.83
Carbon Monoxide	0.00	13.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.45
Volatile Organic Compounds	0.00	0.72	0.00	0.00	0.00	0.00	9.16	6.42	0.00	0.00	9.00	0.41	25.71
Acid Gas (HCl, Cf2)	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06
					0.00		100	新温点			SE STATE OF THE		
Acetaldehyde	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
Acetophenone	0.00	0,00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acrolein	0.00	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.16
Antimony	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Arsenic	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benzene	0.00	0.17	0.00	0.00	0.00		0.00		0.00			- Contractor Contractor	
Beryllium	0.00	0.00	0.00	0.00	0.00	1	0.00	0.00	0.00	-	-	No. of Concession, Name of Street, or other Persons, Name of Street, or ot	-
Bis(2-ethylehexyl)phthalate	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bromomethane	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cadmium	0.00	0.01	0.00	0.00	0.00	-	0.00	0.00	0.00	-	_	-	0.01
Carbon Tetrachloride	0.00	0.00	0.00	0.00	0.00	-	0.00	0.00	0.00				
Chlorine	0.00	0.02	0.00	0.00	0.00	-	0.00	0.00	0.00			-	
Chlorobenzene	0.00	0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00		0.00
Chloroform	0.00	0.00	0.00	0.00	0.00		0.00	-	0.00	0.00			
Chromium, total	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Cobalt	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2,4-Dinitrophenol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ethyl Benzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Formaldehyde	0.00	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.21
Glycol Ethers	0.00	0.02	0.00	0.00	0.00	0.00	7.43	0.00	0.00	0.00	0.00	0.00	7.45
Hydrochloric Acid	0.00	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39
Lead	0.00	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.38
Manganese	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mercury	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Methanol	0.00	0.03	0.00	0.00	0.00	0.00	0.15	6.42	0.00	0.00	0.24	0.00	6.84
Naphthalene	0.00	0.00	0,00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Nickel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4-Nitrophenol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-	
Pentachlorophenol	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Phenol	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Propionaldehyde	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08
Selenium	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Styrene	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
2,3,7,8-Tetrachloro dibenzo-p-													
dioxins	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Toluene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2,4,6-Trichlorophenol	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00
Trichloroethene	0.00	0.00	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vinyl Chloride	0.00	0.00	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00
o-Xylene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Polycyclic Organic Matter (POM)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL HAPS	0.00	1.57	0,00	0.00	0.00	-	7.58	740	0.00	-	THE PERSON NAMED IN	_	-
VOC HAPs	0.00	0.71	W125-2	0.00	0.00	-	7.58	6.42	0.00	-	-	100	STATE OF THE PERSON NAMED IN
Non-VOC HAPs	0.00	0.91	0.00	0.00	0.00	-	-	-	0.00	-	-	-	
PM HAPs	0.00	0.41	1000	0.00	0.00		-	-	0.00	-	-	-	-

## AA-002 : 2015 Actual Emissions Calculation

 Average Heat Input
 59.20 MMBtu/hr

 Hous of Operation in 2014
 8112 hours

 VOC ratio
 0.17 (See Note 2)

Emission Factors for CO, NOx, SO2, PM and VOC were calculated using stack test results from April 7, 2016 and HAPs were calculated using stack test results from July 30, 2012.

Pollutants	Hourly Emission Rate	Emissions						
	lb/MM8tu	lb/yr	ton/yr	lb/hour				
PMfilterable	0.329	157,995.80	78.997901	19.4768				
NOx	0.22	105,650.69	52.825344	13.024				
SO2	0.002	960.46	0.4802304	0.1184				
VOC	0.003	1,440.69	0.7203456	0.1776				
CO	0.056	26,892.90	13.446451	3.3152				

	HAZAR	DOUS AIR POLLUTANTS	51		
	lb/MMBtu	Adjusted lb/MMBtu <sup>2</sup>	lb/yr	ton/yr	lb/hour
Acetaldehyde	8.30E-04	1.41E-04	6.78E+01	3.39E-02	8.35E-0
Acetophenone	3.20E-09	5.44E-10	2.61E-04	1.31E-07	3.22E-08
Acrolein	4.00E-03	6.80E-04	3.27E+02	1.63E-01	4.03E-02
Antimony	7.90E-06	1.34E-06	6.45E-01	3.22E-04	7.95E-05
Arsenic*	9.37E-06	9.37E-06	4.50E+00	2.25E-03	5.55E-04
Benzene	4.20E-03	7.14E-04	3.43E+02	1.71E-01	4.23E-02
Beryllium <sup>3</sup>	1.04E-07	1.04E-07	4.99E-02	2.50E-05	6.16E-06
Bis(2-ethylehexyl)phthalate	4.70E-08	7.99E-09	3.84E-03	1.92E-06	4.73E-0
Bromomethane	1.50E-05	2.55E-06	1.22E+00	6.12E-04	1.51E-04
Cadmium <sup>3</sup>	3.20E-05	3.20E-05	1.54E+01	7.68E-03	1.89E-03
Carbon Tetrachloride	4.50E-05	7.65E-06	3.67E+00	1.84E-03	4.53E-04
Chlorine <sup>3</sup>	1.00E-04	1.00E-04	4.80E+01	2.40E-02	5.92E-03
Chlorobenzene	3.30E-05	5.61E-06	2.69E+00	1.35E-03	3.32E-04
Chloroform	2.80E-05	4.76E-06	2.29E+00	1.14E-03	2.82E-04
Chromium, total <sup>3</sup>	4.16E-05	4.16E-05	2.00E+01	9.99E-03	2.46E-0
Cobalt	6.50E-06	1.11E-06	5.31E-01	2.65E-04	6.54E-05
2,4-Dinitrophenol	1.80E-07	3.06E-08	1.47E-02	7.35E-06	1.81E-06
Ethyl Benzene	3.10E-05	5.27E-06	2.53E+00	1.27E-03	3.12E-04
Formaldehyde	4.40E-03	7 48F-04	3 595+02	1.80E-01	4.43E-02
Hydrochloric Acid <sup>3</sup>	1.00E-04	1.00E-04	4.80E+01	2.40E-02	5.92E-0
Lead <sup>3</sup>	1.62E-03	1.62E-03	7.78E+02	3.89E-01	9.59E-02
Manganese <sup>3</sup>					
	1.60E-03	1.60E-03	7.68E+02	3.84E-01	9.47E-02
Mercury <sup>3</sup>	5.52E-07	5.52E-07	2.65E-01	1.33E-04	3.27E-05
Naphthalene	9.70E-05	1.65E-05	7.92E+00	3.96E-03	9.76E-04
Nickel <sup>3</sup>	1.16E-04	1.16E-04	5.57E+01	2.79E-02	6.87E-03
4-Nitrophenol	1.10E-07	1.87E-08	8.98E-03	4.49E-06	1.11E-06
Pentachlorophenol	5,10E-08	8.67E-09	4.16E-03	2.08E-06	5.13E-07
Phenol	5.10E-05	8.67E-06	4.16E+00	2.08E-03	5.13E-04
Propionaldehyde	6.10E-05	1.04E-05	4.98E+00	2.49E-03	6.14E-04
Selenium <sup>3</sup>	3.65E-05	3.65E-05	1.75E+01	8.76E-03	2.16E-03
Styrene	1.90E-03	3.23E-04	1.55E+02	7.76E-02	1.91E-02
2,3,7,8-Tetrachloro dibenzo-p-	12.50	2.000	200		
dioxins	8.60E-12	1.46E-12	7.02E-07	3.51E-10	8.66E-1
Toluene	9.20E-04	1.56E-04	7.51E+01	3.76E-02	9.26E-0
2,4,6-Trichlorophenol	2.20E-08	3.74E-09	1.80E-03	8.98E-07	2.21E-0
Trichloroethene	3.00E-05	5.10E-06	2.45E+00	1.22E-03	3.02E-04
Vinyl Chloride	1.80E-05	3.06E-06	1.47E+00	7.35E-04	1.81E-04
o-Xylene	2.50E-05	4.25E-06	2.04E+00	1.02E-03	2.52E-04
Polycyclic Organic Matter (POM)	7.90E-05	1.34E-05	6.45E+00	3.22E-03	7.95E-04
Total HAPs, VOC			1.41E+03	7.05E-01	1.68E-0
Total HAPs, non-VOC			1.82E+03	9.09E-01	2.17E-0
Total HAPs			3227.227329	1.6136137	3.85E-0

<sup>1.</sup> List of hazardous air pollutants are provided in http://www.epa.gov/ttn/atw/188polls.html

<sup>2.</sup> Table 1.6-3 of AP-42 (dated 9/03), has a VOC emission factor of 0.017 lb/MMBTU. In the table above this emission factor of 0.017 lb/MMBtu has been adjusted based on average of stack test result which is 0.0034 lb/MMBtu. (Ratio = 0.003/0.017 = 0.17)

<sup>3.</sup> From July 2012 Stack Test

## AA003: 2015 Actual Emissions Calculation

Average Heat Input Hous of Operation in 2015 29.29 MMBtu/hr 0 hours

Fulciana	<b>Emission Factor</b>	Emissions						
Emissions	lb/MMscf	lb/yr	ton/yr	lb/hr				
PM <sub>total</sub>	7.6	0.00	0.00	0.00				
PM <sub>filterable</sub>	1.9	0.00	0.00	0.00				
NO <sub>x</sub>	100	0.00	0.00	0.00				
SO <sub>2</sub>	0.6	0.00	0.00	0.00				
VOC	5.5	0.00	0.00	0.00				
CO	84	0.00	0.00	0.00				
Arsenic	2.00E-04	0.00	0.00	0.00				
Benzene	2.10E-03	0.00	0.00	0.00				
Beryllium	1.20E-05	0.00	0.00	0.00				
Cadmium	1.40E-03	0.00	0.00	0.00				
Chromium	1.40E-03	0.00	0.00	0.00				
Cobalt	8.40E-05	0.00	0.00	0.00				
Dichlorobenzene	1.20E-03	0.00	0.00	0.00				
Formaldehyde	7.50E-02	0.00	0.00	0.00				
Hexane	1.8	0.00	0.00	0.00				
Manganese	3.80E-04	0.00	0.00	0.00				
Mercury	2.60E-04	0.00	0.00	0.00				
Naphthalene	6.10E-04	0.00	0.00	0.00				
Nickel	2.10E-03	0.00	0.00	0.00				
Selenium	2.40E-05	0.00	0.00	0.00				
Toluene	3.40E-03	0.00	0.00	0.00				
Polycyclic Organic Matter (POM)	8.82E-05	0.00	0.00	0.00				
Total HAPs		0.00	0.00	0.00				
HAPs, Total VOC		0.00	0.00	0.00				
HAPs, Total non-VOC		0.00	0.00	0.00				

## AA004: 2015 Actual Emissions Calculation

Average Heat Input Hous of Operation in 2015 65.00 MMBtu/hr 0 hours

Facinations	<b>Emission Factor</b>	Emissions						
Emissions	lb/MMscf	lb/yr	ton/yr	lb/hr				
PM <sub>total</sub>	7.6	0.00	0.00	0.00				
PM <sub>filterable</sub>	1.9	0.00	0.00	0.00				
NO <sub>x</sub>	100	0.00	0.00	0.00				
SO <sub>2</sub>	0.6	0.00	0.00	0.00				
voc	5.5	0.00	0.00	0.00				
СО	84	0.00	0.00	0.00				
Arsenic	2.00E-04	0.00	0.00	0.00				
Benzene	2.10E-03	0.00	0.00	0.00				
Beryllium	1.20E-05	0.00	0.00	0.00				
Cadmium	1.40E-03	0.00	0.00	0.00				
Chromium	1.40E-03	0.00	0.00	0.00				
Cobalt	8.40E-05	0.00	0.00	0.00				
Dichlorobenzene	1.20E-03	0.00	0.00	0.00				
Formaldehyde	7.50E-02	0.00	0.00	0.00				
Hexane	1.8	0.00	0.00	0.00				
Manganese	3.80E-04	0.00	0.00	0.00				
Mercury	2.60E-04	0.00	0.00	0.00				
Naphthalene	6.10E-04	0.00	0.00	0.00				
Nickel	2.10E-03	0.00	0.00	0.00				
Selenium	2.40E-05	0.00	0.00	0.00				
Toluene	3.40E-03	0.00	0.00	0.00				
Polycyclic Organic Matter (POM)	8.82E-05	0.00	0.00	0.00				
Total HAPs		0.00	0.00	0.00				
HAPs, Total VOC		0.00	0.00	0.00				
HAPs, Total non-VOC		0.00	0.00	0.00				

Warren Co.
Anderson Tully Lumba
Waltersville Lumb
Al 1536

## 2015

(2014 Actual Emissions)

## MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY MAJOR AIR POLLUTION SOURCE ANNUAL EMISSIONS REPORTING FORM

Mailing Address P.O. BOX 2261 JACKSON, MS 39225-2261 Physical Address 515 EAST AMITE STREET JACKSON, MS 39201

In accordance with Section 49-17-30, Mississippi Code of 1972 Annotated, all sources that choose to base their annual Title V Fee on actual emissions shall submit, by July 1 of each year, and inventory of emissions for the previous calendar year.

MDEQ Facility ID #: 278000004 AI ID: 1536

Facility:

Anderson Tully Lumber Company, Waltersville Lumber Mill

Site Address:

1725 North Washington Street

Vicksburg, MS 39180

Warren County

If actual emissions are reported, they should be the actual emissions that were emitted from the facility during calendar year 2013. The annual permit fee is due on September 1st of each year.

Pollutant	Annual Allowable (Potential) Emission Rate (TPY)	FOR INFO ONLY Actual Emission Rate (TPY) Reported for Calendar Year (2013)	Actual Annual (2014) Emission Rate (TPY)
Particulate Matter	740.84	127.56	142.94
Sulfur Dioxide	49.17	0.49	0.59
Nitrogen oxides	174.11	43.80	65.33
Carbon Monoxide	119.85	45.02	16.63
VOC	119.90	13.96	13.22
Total reduced sulfur compounds	0.00	0.00	0.00
Lead	0.00	0.33	0.48
CFC/HCFC, Total	0.00	0.00	0.00
Other	0.00	0.00	0.00
HAP, Total (VOC)	27.87	2.44	10.03
HAP, Total (NON VOC)	8.88	0.75	0.75

VOC Reflects Total VOC from the facility including VOCs that are HAPs.

Attach calculations, monitoring data, measurements, etc. from which actual emission rates were determined. Actual emission rates will not be accepted unless the method of calculation is attached.

I, the undersigned, am the owner or authorized representative of the facility described on this fee form. I certify that the statements and calculations made on this form are complete and accurate to the best of my knowledge.

Kamace liest	6-22-15
Signature	Date
Kamace Priest	Director of Risk Management
Typed or Printed Name	Title

Anderson Tully Lumber Company Vicksburg, MS

RECEIVED

JUN 26 2015

Dept of Environmental Quality

ANDERSON-TULLY

Certified No. Return Receipt Requested

June 22, 2015

Ms. Krystal Rudolph Mississippi Department of Environmental Quality Air Division P. O. Box 2261 Jackson, Mississippi 39225-2261

Re: Anderson-Tully Lumber Company

Vicksburg, Mississippi

Title V 2014 Emissions Inventory

Facility No. 278000004 - Warren County

Dear Ms. Rudolph,

Please find enclosed the 2015 Annual Emissions Reporting Form (AERF) and emissions calculations for purposes of assessing the Title V Operating Permit Fee for the Anderson-Tully Lumber Company Vicksburg, Mississippi.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

If you have any questions or need any additional information, please call Andrew S. Covington at (601) 696-7146 or by email at <a href="mailto:acovington@allenes.com">acovington@allenes.com</a>.

Sincerely.

Kamace Priest

Director of Risk Management

CC: Andrew S. Covington, P.E. - Allen Engineering and Science

Enclosures

# ANNUAL EMISSIONS REPORTING FORM

## PREPARED FOR:

Anderson Tully Lumber Company
Waltersville Lumber Mill
Facility ID # 2780-00004
1725 North Washington Street
Vicksburg, Mississippi 39180
Warren County

## PREPARED BY:



6360 I-55 North, Suite 330 Jackson, Mississippi 39211

Project No. 15048

**JUNE 2015** 



## **Lumber Handling**

Particulate Matter emissions from Lumber Handling operations (Emission Point AA-001) are calculated using May 14, 2004 stack test results.

## PM<sub>10</sub> Emission Rate = 0.077 lb PM<sub>10</sub> per hour

Planer Mill – AA-001(A)

The planer mill operated for a total of 43.7 hours in 2014.

PM<sub>10</sub> = 3.365 lb /year

0.001682 ton/year

Grading and Lumber Inspection Station – AA-001(C)

The grading and lumber inspection station operated for a total of 1,851 hours in 2014.

PM<sub>10</sub> = 142.5 lb/year 0.071 ton/year

Fuel Storage Silos – AA-001(D)

The fuel storage silos are operated for a total of 8,760 hours in 2014. Vents through AA-001(F).

Dry Boiler Feed Silos – AA-001(F)

The dry boiler feed silo was operated for a total of 3,960 hours in 2014.

PM<sub>10</sub> = 304.920 lb/year 0.152 ton/year



## Wellons Wood Fired Boiler

Parameter	Annual Emissions (ton/year)		
PMfilterable	97.71		
NO <sub>x</sub>	65.33		
SO <sub>2</sub>	0.59		
VOC	0.88		
CO	16.03		
Total HAPs	2.06		
HAP, Total (VOC)	0.97		
HAP, Total (non-VOC)	1.09		
Chlorine / Hydrochloric Acid	0.06		

### **Products of Wood Residue Combustion**

Pollutants emissions for CO,  $NO_x$ ,  $SO_2$  PM and VOC were calculated using stack test results from April 24, 2014 and HAPs were calculated using stack test results from July 30, 2012.

## January 1 - December 31, 2013

Steam enthalpy	997.30	BTU/lb steam
Hours of Operation	8,376.00	hr/period
Boiler Efficiency	90	percent
Heat input	593,858.40	MMBtu/period
Average Heat Input	70.90	MMBtu/hr

### **Emission Calculations:**

Pollutant	Average Heat Input	Hourly Emissions Emission		Emissions	
	MMBtu/hr	lb/MMBtu	lb/yr	ton/yr	lb/hr
PMfilterable	70.90	0.329	195,412.08	97.71	23.33
NOx	70.90	0.220	130,662.60	65.33	15.60
SO <sub>2</sub>	70.90	0.002	1,172.64	0.59	0.14
VOC	70.90	0.003	1,758.96	0.88	0.21
CO	70.90	0.056	33,252.72	16.63	3.97



### Hazardous Air Pollutants1

	lb/MMBtu	Adjusted Ib/MMBtu <sup>2</sup>	lb/yr	ton/yr	lb/hour
Acetaldehyde	8.30E-04	1.41E-04	8.35E+01	4.18E-02	9.97E-03
Acetophenone	3.20E-09	5.44E-10	3.22E-04	1.61E-07	3.85E-08
Acrolein	4.00E-03	6.80E-04	4.04E+02	2.02E-01	4.82E-02
Antimony	7.90E-06	1.34E-06	7.96E-01	3.98E-04	9.50E-05
Arsenic <sup>3</sup>	9.37E-06	9.37E-06	5.56E+00	2.78E-03	6.64E-04
Benzene	4.20E-03	1.14E-03	6.77E+02	3.38E-01	8.08E-02
Beryllium <sup>3</sup>	1.04E-07	1.04E-07	6.17E-02	3.09E-05	7.37E-06
Bis(2-ethylehexyl)phthalate	4.70E-08	7.99E-09	4.74E-03	2.37E-06	5.66E-07
Bromomethane	1.50E-05	2.55E-06	1.52E+00	7.58E-04	1.81E-04
Cadmium <sup>3</sup>	3.20E-05	3.20E-05	1.90E+01	9.51E-03	2.27E-03
Carbon Tetrachloride	4.50E-05	7.74E-06	4.60E+00	2.30E-03	5.49E-04
Chlorine <sup>3</sup>	1.00E-04	1.00E-04	5.94E+01	2.97E-02	7.09E-03
Chlorobenzene	3.30E-05	5.61E-06	3.33E+00	1.67E-03	3.98E-04
Chloroform	2.80E-05	4.76E-06	2.82E+00	1.41E-03	3.37E-04
Chromium, total <sup>3</sup>	4.16E-05	4.16E-05	2.47E+01	1.24E-02	2.95E-03
Cobalt	6.50E-06	1.11E-06	6.59E-01	3.30E-04	7.87E-05
2,4-Dinitrophenol	1.80E-07	3.06E-08	1.82E-02	9.09E-06	2.17E-06
Ethyl Benzene	3.10E-05	5.27E-06	3.13E+00	1.57E-03	3.74E-04
Formaldehyde	4.40E-03	7.48E-04	4.44E+02	2.22E-01	5.30E-02
Hydrochloric Acid <sup>3</sup>	1.00E-04	1.00E-04	5.94E+01	2.97E-02	7.09E-03
Lead <sup>3</sup>	1.62E-03	1.62E-03	9.63E+02	4.82E-01	1.15E-01
Manganese <sup>3</sup>	1.60E-03	1.60E-03	9.46E+02	4.73E-01	1.13E-01
Mercury <sup>3</sup>	5.52E-07	5.52E-07	3.28E-01	1.64E-04	3.91E-05
Naphthalene	9.70E-05	1.65E-05	9.80E+00	4.90E-03	1.17E-03
Nickel <sup>3</sup>	1.16E-04	1.16E-04	6.89E+01	3.44E-02	8.22E-03
4-Nitrophenol	1.10E-07	1.87E-08	1.11E-02	5.53E-06	1.32E-06
Pentachlorophenol	5.10E-08	8.67E-09	5.15E-03	2.58E-06	6.15E-07
Phenol	5.10E-05	8.67E-06	5.15E+00	2.58E-03	6.15E-04
Propionaldehyde	6.10E-05	1.04E-05	6.17E+00	3.09E-03	7.37E-04
Selenium <sup>3</sup>	3.65E-05	3.65E-05	2.17E+01	1.08E-02	2.59E-03
Styrene	1.90E-03	3.23E-04	1.92E+02	9.59E-02	2.29E-02
2,3,7,8-Tetrachloro dibenzo-p- dioxins	8.60E-12	1.46E-12	8.71E-07	4.36E-10	1.04E-10
Toluene	9.20E-04	1.56E-04	9.30E+01	4.65E-02	1.11E-02
2,4,6-Trichlorophenol	2.20E-08	3.74E-09	2.22E-03	1.11E-06	2.65E-07
Trichloroethene	3.00E-05	5.10E-06	3.03E+00	1.52E-03	3.62E-04
Vinyl Chloride	1.80E-05	3.06E-06	1.82E+00	9.09E-04	2.17E-04
o-Xylene	2.50E-05	4.25E-06	2.52E+00	1.26E-03	3.01E-04
Polycyclic Organic Matter (POM)	7.90E-05	1.34E-05	7.96E+00	3.98E-03	9.50E-04
Total HAPs, VOC			1940.00	0.97	0.23
Total HAPs, non-VOC			2170.00	1.09	0.26
Total HAPs			4110.00	2.06	0.49

- 1. List of hazardous air pollutants are provided in http://www.epa.gov/ttn/atw/188polls.html
- 2. Table 1.6-3 of AP-42 (dated 9/03), has a VOC emission factor of 0.017 lb/MMBTU. In the table above this emission factor of 0.017 lb/MMBtu has been adjusted based on average of stack test result which is 0.003 lb/MMBtu. (Ratio = 0.003/0.017 = 0.17)
- 3. From July 2012 Stack Test



## Cleaver Brooks Backup Boiler

There are no reportable emissions from AA-003 since the backup boiler was not operated in 2014.

Rated Capacity Maximum Hours of Operation 29.29 MMBtu/hr 0 hr/year



## Portable Boiler

There are no reportable emissions from AA-004 since the portable boiler was not operated in 2014.

Rated Capacity Maximum Hours of Operation 65 MMBtu/hr 0 hr/year



## Log Debarking

Log volume received in 2014:	25,867,444	board feet
1 truck load carries approximately:	3,500	board feet
No. of trucks in a year =	25,867,444/3500	Trucks/year
	7,391	Trucks/year
In Mississippi, approximate truck weight:	28	Tons/truck
Total amount of wood received in 2014 =	206,948	tons/year
	413,896,000	lbs/year

Emissions calculated using AP-42 Log Debarking emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

Emission Factor	0.024	lb PM <sub>10</sub> /ton logs
PM <sub>10</sub> =	4,966.75	lb PM <sub>10</sub> /year
	2.48	ton PM <sub>10</sub> /year

## Log Sawing

Log cross-sawed in 2014:	25,867,444	board feet
1 truck load carries approximately:	3,500	board feet
No. of trucks in a year =	25,867,444/3500	Trucks/year
	7,391	Trucks/year
In Mississippi, approximate truck weight:	28	Tons/truck
Total amount of wood received in 2014 =	206,948	tons/year
	413,896,000	lbs/year

Emissions calculated using AP-42 Log Debarking emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

Emission Factor	0.024	lb PM <sub>10</sub> /ton logs
PM <sub>10</sub> =	4,966.75	lb PM <sub>10</sub> /year
	2.48	ton PM <sub>10</sub> /year

### Hog and Chipper

Emissions calculated using AP-42 emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80). ATCO has historically used an emission factor equivalent to 10% of the published AP-42 factor based on good engineering judgment, experience and the assumption that 30% of the emissions are PM<sub>10</sub>.

#### Bark Hog



Total amount of wood received in 2014 = 206,948 tons/year Emission Factor 0.0105 lb  $PM_{10}$ /ton logs  $PM_{10}$  = 2,172.95 lb  $PM_{10}$ /year 1.09 ton  $PM_{10}$ /year

## Mill Chipper

Total amount of wood received in 2014 = 206,948 tons/year Emission Factor 0.0105 lb PM<sub>10</sub>/ton logs PM<sub>10</sub> = 2,172.95 lb PM<sub>10</sub>/year 1.09 ton PM<sub>10</sub>/year

#### **Tub Grinder**

Emissions calculated using AP-42 Log Sawdust handling emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

Total amount of wood waste handled in 2014 = 3,478 tons/year Emission Factor 1.0 lb  $PM_{10}$ /ton sawdust handled 3,478.00 lb  $PM_{10}$ /year 1.74 ton  $PM_{10}$ /year



## **Fugitive In-Plant Road Dust**

ATCO has historically used a default value of 1 lb PM/hr for insignificant activities to calculate the road dust emissions.

Total hours of operations for Wellons Boiler in 2014	8,376.00	hours
Emission Factor	1.00	lb PM <sub>10</sub> /hr
PM <sub>10</sub> =	8,376.00	lb PM <sub>10</sub> /year
	4.19	ton PM <sub>10</sub> /year



## **Lumber Treatment Station**

	Usage*	VOC		Glycol Ethers		Methanol		Total HAPs	
	Gallons	llons %	ton/yr	%	ton/yr	%	ton/yr	tons/yr	
Busan 1223	9.18	0.00	0	0.00	0	0.00	0	0.00	0.00
Busperse 293	9.85	1650.00	0	0.00	0	0.00	0	0.00	0.00
Busan 1249	7.88	0.00	0	0.00	0	0.00	0	0.00	0.00
Busan 1009	9.01	3300.00	74	11.00	60	8.92	1.2	0.18	9.10
TOTAL				11.00		8.92		0.18	9.10

<sup>\*</sup>Quantities used in 2014.



## Lumber End Coat and Logo Color Coat Areas

Material Name	Density Ib/gal	Usage* Gallons	VOC		Methanol	
			%	ton/yr	%	ton/yr
Anchorseal K	7.93	4950	0.00	0.00	0.00	0.00
Anchorseal K (cold)	7.93	275	71.00	0.77	71.00	0.77
Gempaint	9.18	0	0.00	0.00	0.00	0.00
Gempaint (cold)	9.18	0	64.00	0.00	64.00	0.00
Gempaint (PG)	9.18	0	0.00	0.00	0.00	0.00
TOTAL		-		0.77		0.77

<sup>\*</sup>Quantities used in 2014.



## Inspection Station Planer Mill

Emissions calculated using May 14, 2004 stack test results of 0.077 lb PM<sub>10</sub> per hour.

The inspection station planer mill operated for a total of 43.7 hours in 2014.

PM<sub>10</sub> =

3.3649 lb PM<sub>10</sub>/year

0.0017 ton PM<sub>10</sub>/year



# AA-013

# **Power Plant Sales**

Emissions calculated using AP-42 Log Sawdust handling emission factor from Table 10.3-1 "Uncontrolled Fugitive Particulate for Plywood Veneer and Layout Operations" (4th Edition, 10/80).

Total amount of wood waste handled in 2014 = Emission Factor PM<sub>10</sub> = 61,501 tons/year
1.0 lb PM<sub>10</sub>/ton sawdust handled
61,501 lb PM<sub>10</sub>/year
30.75 ton PM<sub>10</sub>/year



## AK-001 028

# **Drying Kilns**

To reduce the moisture content of lumber, indirect steam heated drying kilns and air drying sheds are used. The VOC emissions from lumber kilns were tested by the National Council of Air and Stream Improvement (NCASI). The testing was conducted on pine and determined to be 5.88 lb VOC per thousand BF. Since ATCO dried hardwood, an emission factor of 10% of the pine lumber drying factor is used.

Kiln dried wood in 2014	677,368.00	Board foot
Emission Factor	Control of the second s	Ib VOC/thousand BF
VOC =		lb VOC/year
	0.20	ton VOC/vear

Two hazardous air pollutants, Methanol and Formaldehyde, are emitted during the kiln drying process.

Emission Factors:	0.016	lb Methanol/thousand BF
	0.002	lb Formaldehyde/thousand BF
HAP - Methanol	10.84	lb Methanol/year
	0.01	tons Methanol/year
HAP - Formaldehyde	1.35	lb Formaldehyde/year
total a continue of the	0.00	tons Formaldehyde/year



## IA-001

# Miscellaneous Activities

Insignificant Activities at ATCO include welding and storage tanks.

ATCO has historically used a default value of 1 lb PM/hr for insignificant activities to calculate emissions from welding and grinding operations. These activities are conducted for 3 hours a day, six days per week, and 52 weeks in 2014.

Hours of operation	936.00	hours
Emission Factor	1.00	lb PM <sub>10</sub> /hour
PM <sub>10</sub> =	936.00	Ib PM <sub>10</sub> /year
		ton PM <sub>to/vear</sub>

# Storage Tanks

This facility has one 2,000 gallon diesel storage tank (vertical) and one 940 gallon gasoline storage tank (horizontal) at the facility.

The following information as input into EPA Tanks 4.09D software for calculation of the working and breathing losses from the two storage tanks. No calculations were run for the Waste Oil tank as the vapor pressure is too low to be of concern.

Tank ID	Diesel Fuel	Gasoline
Tank Size (gals)	2,000	940
Orientation	Vertical	Horizontal
Annual Throughput (gals/year)	125,104	6,350
Color	Silver	Silver
Working Loss (lbs/year)	2.22	370.81
Breathing Loss (lbs/year)	0.09	367.35
Total Loss (lbs/year)	2.31	738.16

# **Appendix E**

**RBLC Report** 

Format RBLC Report

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# COMPREHENSIVE REPORT Report Date:07/16/2020

**Facility Information** 

RBLC ID: TX-0870 (draft) Date Determination

**Last Updated:** 11/26/2019

Corporate/Company Name: GEORGIA-PACIFIC WOOD PRODUCTS LLC Permit Number:

17395 AND PSDTX1008M3

Facility Name:LUMBER MANUFACTURING PLANTPermit Date:11/26/2019 (actual)Facility Contact:DANIEL WRIGHT 936-829-1658FRS Number:110002346426

Facility Description: Four existing kilns (EPNs LU-04-FU and LU-05-FU) production increase SIC Code: 2421

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL:

7/16/2020

EPA Region: 6 COUNTRY: USA

Facility County: ANGELINA

Facility State: TX

Facility ZIP Code:

Permit Issued By: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

Other Agency Contact Info: Ms. Jean Shaw, (512) 239-1823, Jean.Shaw@tceq.texas.gov

**Permit Notes:** 

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance: CLASS1 AR Caney Creek > 250 km

## Process/Pollutant Information

PROCESS Lumber Kilns

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 188000.00 NBF/Kiln

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

 $Pollutant \ Group(s): \ \hspace{1cm} (\ Volatile \ Organic \ Compounds \ (VOC) \ )$ 

**Emission Limit 1:** 5.4900 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** MACT

Control Method: (P) Proper design and operating practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown
Pollutant/Compliance Notes: MACT DDDD

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**Facility Information** 

RBLC ID: ID-0022 (final) Date Determination 12/13/2019

FRS Number:

7/16/2020

Last Updated:

POTLATCHDELTIC LAND AND LUMBER, LLC R10PSD00100 Corporate/Company Name: **Permit Number:** ST. MARIES COMPLEX 06/21/2019 (actual) **Facility Name: Permit Date:** 110000468789

IACOR **Facility Contact:** 

ODEKIRK 2082457503 JACOB.ODEKIRK@POTLATCHDELTIC.COM

Sawmill manufactures kiln-dried softwood dimensional lumber. Plywood mill 2421 **Facility Description:** SIC Code:

manufactures softwood plywood.

B: Add new process to existing facility 321113 **NAICS Code: Permit Type:** 

Permit URL: https://www.epa.gov/caa-permitting/potlatchdeltic-land-and-lumber-llc-prevention-significant-deterioration-

10 USA **EPA Region: COUNTRY:** 

BENEWAH **Facility County:** 

ID **Facility State:** Facility ZIP Code: 83861

Permit Issued By: EPA REGION X (Agency Name)

MR. DOUGLAS HARDESTY(Agency Contact) (208) 378-5759 Hardesty.Doug@epa.gov

Zach Hedgpeth: 206.553.1217, hedgpeth.zach@epa.gov Other Agency Contact Info:

Dan Meyer: 206.553.4150, meyer.dan@epa.gov

PotlatchDeltic proposes to construct a fifth steam-heated batch-type lumber dry kiln, expanding the facility's capacity to produce dried **Permit Notes:** 

lumber and increasing the utilization of two existing biomass boilers and upstream sawmill and downstream planer mill operations. The

project is subject to PSD review of VOC and subject to tribal minor NSR for CO, NOx, PM, PM10 and PM2.5.

**Boundary Type:** Class 1 Area State: Boundary: Distance: **Affected Boundaries:** CLASS1 100km - 50km MT Cabinet Mountains 100km - 50km CLASS1 ID Hells Canyon CLASS1 100km - 50km MT Mission Mountain Selway-Bitterroot CLASS1 ID 100km - 50km INTL BORDER US/Canada Border 100km - 50km

Pollutant Name: **Facility-wide Emissions Increase: Facility-wide Emissions:** 

50.0000 (Tons/Year) Carbon Monoxide Nitrogen Oxides (NOx) 15.0000 (Tons/Year) 16.0000 (Tons/Year) Particulate Matter (PM) Sulfur Oxides (SOx) 2.0000 (Tons/Year) Volatile Organic Compounds (VOC) 63.0000 (Tons/Year)

## Process/Pollutant Information

PROCESS Dual track steam-heated batch-type lumber dry kiln

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** 

68133.00 mbf/yr Throughput:

**Process Notes:** Newly manufactured kiln from Wellons. A single charge consists of approximately 280,000 board feet of softwood lumber. Permittee is restricted to

drying only grand fir, western hemlock and white fir in this kiln. It typically takes 36 hours to dry a batch of lumber consisting of any or all of the

three approved species. 68,133 mbf/yr = (280,000 bf/charge)\*(mbf/1000 bf)\*(charge/36 hr)\*(8760 hr/yr)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Other

Region 10 WPP1 VOC (OTM-26 with additional pollutants) Other Test Method:

(Volatile Organic Compounds (VOC)) **Pollutant Group(s):** 

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD** Case-by-Case Basis:

Other Applicable Requirements:

**Control Method:** (P) PSD BACT work practice requirements: 1. The 60-minute block average dry bulb temperature of air exiting

the lumber shall not exceed 245F. Compliance is determined separately at 20 locations (two loads, ten monitoring locations each) at any one time. After each periodic fan reversal, compliance is similarly determined at 20 new locations on the opposite side of each load (two loads, ten monitoring locations each). 2. The moisture content of the lumber shall not be less than 13%, dry basis. Compliance is determined at the end of the drying cycle, and prior to equalizing and conditioning (if any) by averaging the instantaneous moisture content measured at eight separate locations (four per load). For partial loads, the number of monitoring locations shall be proportional to the load's length (e.g. two monitoring locations for a load spanning half the length of the kiln). Emission limit informing the BACT analysis: The permittee requested, and EPA Region 10 established, a 50 tpy VOC limit

applicable to the kiln. The threshold value roughly reflects the kiln's maximum annual emissions considering the three species of wood the permittee is authorized to dry in the kiln. A batch's emissions are determined by multiplying the temperature-dependent emission factor (lb/mbf) by the volume of lumber in the batch (mbf).

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

SC-0192 (final) **RBLC ID: Date Determination** Last Updated:

CANFOR SOUTHERN PINE **Permit Number:** 1340-0029-CI Corporate/Company Name:

CANFOR SOUTHERN PINE - CONWAY MILL 05/21/2019 (actual) **Facility Name:** Permit Date: ERNEST RABON 843-349-3482 ERNEST.RABON@CANFOR.COM FRS Number: 110000740789 **Facility Contact:** 

Lumber mill that produces structural lumber from pine logs. 2421 **Facility Description:** SIC Code: 321113 **NAICS Code:** 

C: Modify process at existing facility Permit Type:

Permit URL:

4 USA COUNTRY: **EPA Region:** 

HORRY **Facility County:** SC **Facility State:** 29526 **Facility ZIP Code:** 

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

**Permit Notes:** 

**Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:** 

> Carbon Monoxide 175.3800 (Tons/Year) Nitrogen Oxides (NOx) 22.5800 (Tons/Year) Particulate Matter (PM) 6.8000 (Tons/Year) 2.3900 (Tons/Year) Sulfur Oxides (SOx) Volatile Organic Compounds (VOC) 113.8200 (Tons/Year)

Process/Pollutant Information

PROCESS Batch Lumber Kilns

NAME:

**Process Type:** 

30.800 (Wood Lumber Kilns)

**Primary Fuel:** Throughput:

**Process Notes:** Annual increase in board-feet for 2 kilns. Kiln No. 4 increases to 58.03 MMBd-ft/yr; Kiln No. 5 increases to 29.02 MMbd-ft/yr.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

4.2000 MBD-FT **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: **BACT-PSD** Other Applicable Requirements: SIP

**Control Method:** (P) Work practice standards

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton 06/03/2019

Compliance Verified: Unknown

Pollutant/Compliance Notes: VOC as terpene+methanol+formaldehyde

## Process/Pollutant Information

PROCESS Boiler No. 2

NAME:

Process Type: 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

Throughput: 0

Process Notes: 29.113 MMBtu/hr rated heat input capacity

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0375 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\,$  MACT , NSPS , SIP

Control Method: (P) Work Practice Standards

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT, SIP
Control Method: (P) Work Practice Standards

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: 29.113 MMBtu/hr rated heat input capacity

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# **Facility Information**

RBLC ID: LA-0347 (draft) Date Determination

Last Updated: 04/02/2020

Corporate/Company Name: HOOD INDUSTRIES, INC Permit Number: PSD-LA-831

Facility Name: BOGALUSA SAWMILL Permit Date: 04/25/2019 (actual)

Facility Contact: BEN CRIM 6012964819 CRIM@HOODINDUSTRIES.COM FRS Number: Not Entered

Facility Description: A sawmill proposed to replace two lumber kilns SIC Code: 2421

321113

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Permit Type: **NAICS Code:** 

Permit URL:

COUNTRY: USA **EPA Region:** 

WASHING TON **Facility County:** 

LA **Facility State:** 70427 **Facility ZIP Code:** 

LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name) Permit Issued By:

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

permit writer: Dan Nguyen Other Agency Contact Info:

**Permit Notes:** 

**Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:** 

168.5200 (Tons/Year) Carbon Monoxide 140.8100 (Tons/Year) Nitrogen Oxides (NOx) Particulate Matter (PM) 88.9200 (Tons/Year) Sulfur Oxides (SOx) 7.2200 (Tons/Year) Volatile Organic Compounds (VOC) 462.7400 (Tons/Year)

## Process/Pollutant Information

**PROCESS** lumber kilns (2)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 52.03 mm BF/yr (each)

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) Proper operation and maintenance (operate as manufacturer's recommendations, inspect weekly, repair

timely, place kiln sticker uniformly, minimize short circuiting, set target moisture content as high as possible,

minimize redrying)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

**RBLC ID:** TX-0856 (draft) **Date Determination** 

Last Updated: 10/11/2019

WEST FRASER WOOD PRODUCTS 7286 AND Corporate/Company Name: Permit Number:

PSDTX892M2 LUMBER MILL 03/20/2019 **Permit Date: Facility Name:** (actual)

**Facility Contact:** FRS Number:

increase production to 375,000 MBF/YR from the addition of a direct-fired continuous kiln 2421 **Facility Description:** SIC Code:

(EPN DFKILN-3) and mechanical sawdust conveyance system to the new kiln burner D: Both B (Add new process to existing facility) &C (Modify process at existing facility) 321113 **NAICS Code: Permit Type:** 

https://cfpub.epa.gov/rblc/index.cfm?action=Reports.ReportComprehensiveReport&ReportFormat=txt

CHARLES MANESS 903-628-2506

Not Found

Permit URL:

**EPA Region:** 6 COUNTRY: USA

**BOWIE Facility County:** TX**Facility State:** 

Facility ZIP Code:

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) Permit Issued By:

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

Mr. Bill Moody, P.E., (512) 239-1859, Bill.Moody@tceq.texas.gov Other Agency Contact Info:

**Permit Notes:** 

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** CLASS1 Caney Creek 100km - 50km AR

Process/Pollutant Information

**PROCESS** Direct-Fired Wood Drying Kiln No. 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** wood Throughput: 14.88 MBF

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

4.2400 LB/MBF **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: MACT

**Control Method:** (P) proper operation and maintenance of the kiln

Est. % Efficiency:

Cost Effectiveness: **Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown

Pollutant/Compliance Notes:

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**Facility Information** 

Corporate/Company Name:

**RBLC ID:** SC-0186 (final) **Date Determination** 

Last Updated:

GEORGIA-PACIFIC WOOD PRODUCTS, LLC GEORGIA-PACIFIC WOOD PRODUCTS, LLC - PROSPERITY CHIP-N-SAW **Facility Name:** 

**Facility Contact:** 

**Facility Description:** Georgia-Pacific Wood Products LLC, Prosperity Chip-N-Saw is a southern yellow

pine sawmill. This facility produces finished lumber from logs. Logs are unloaded and stored in the log yard. First, the logs are debarked, cut to size, and processed through the Sawmill, where the logs are cut into lumber. Next, the rough-cut green lumber is dried in the steam-heated lumber kilns. The wood-fired boiler at the adjacent Georgia-Pacific Prosperity Plywood (1780-0008) plant provides steam to the Sawmill. Then dried lumber is processed through the planer mill for finishing. Finished lumber is then packaged and shipped off-site. The plant has the capability to import and export green and/or dry lumber. The facility currently has three (3) lumber drying kilns in operation, Lumber Kiln 1 (LK1) and Lumber Kiln 2 (LK2) are batch, indirect-fired kilns with a total lumber drying capacity of 105,600 board feet per charge each, and Lumber Kiln 3 (LK3) is a continuous, indirect-fired kiln

04/04/2019 1780-0011-CC **Permit Number:** 

02/21/2019 (actual) **Permit Date:** 

Not Found FRS Number:

2421 SIC Code:

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with a lumber drying capacity of 70,300 thousand board feet (MBF) per year. The facility's total existing lumber drying capacity is 158,401 MBF/yr. The steam used in these processes is generated by the 200 million Btu/hr Wood Fired Boiler located at the Georgia-Pacific Wood Products LLC – Prosperity Plywood Plant. Dry planer shavings, green sawdust, and green wood chips are stored in bins and shipped offsite. Bark from the debarker, other green end material from the log yard and green sawdust are shipped off-site or to the adjacent Georgia-Pacific Plywood Plant to use

as boiler fuel.

Permit Type: C: Modify process at existing facility NAICS Code: 321999

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: NEWBERRY

Facility State: SC Facility ZIP Code: 29127

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Permit Notes: The facility is proposing to install a new, indirect-fired, continuous lumber drying kiln (LK4), with an annual lumber drying capacity of

88,000 thousand board feet per year (MBF/yr). The new kiln will be heated by steam provided from the collocated Plywood facility's wood fired boiler. As a part of this project, the facility's two batch fired kilns will be permanently retired; the existing continuous lumber

drying kiln will remain unaffected by this project. The facility's new total lumber drying capacity will be 158,300 MBF/yr.

# Process/Pollutant Information

PROCESS Lumber Drying Kiln 4

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Steam

**Throughput:** 88000.00 1000 bf/yr

Process Notes: The new, indirect-fired, continuous lumber drying kiln (LK4), has an annual lumber drying capacity of 88,000 thousand board feet per year

(MBF/yr). The new kiln will be heated by steam provided from the collocated Plywood facility's wood fired boiler.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 5.7200 LB VOC/1000 BD-FT VOC MEASURES AS WPP1

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: MACT

Control Method: (P) S.C. Regulation 61-62.5, Standard No. 7) Volatile Organic Compounds (VOC) Best Available Control

Technology (BACT) for the continuous lumber drying kiln, KLN7, is work practice standards. VOC emissions

are based on an emission factor of 5.72 lb VOC/103 bd-ft (as WPP1 VOC).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

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**Facility Information** 

RBLC ID: AR-0158 (final) Date Determination

Company Name POTLATCHDELTIC LAND & LUMBER, LLC Permit Number 0356-AOP-R11

Corporate/Company Name: POTLATCHDELTIC LAND & LUMBER, LLC Permit Number: 0356-AOP-R11

Facility Name: POTLATCHDELTIC LAND AND LUMBER, LLC - WARREN LUMBER MILL Permit Date: 01/03/2019 (actual)

Facility Contact: JABIE POST 5708206817 JABIE.POST@POTLATCHCORP.COM FRS Number: 110000780511

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Facility Description: SIC Code: 2411

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL: https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0356-AOP-R11.pdf

EPA Region: 6 COUNTRY: USA

Facility County: BRADLEY
Facility State: AR

Facility ZIP Code: 71671

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Permit Notes: REPLACE 5 EXISTING BATCH KILNS WITH 3 CONTINUOUS KILNS; INCREASE PRODUCTION LIMIT FROM 265 MMBF/YR

TO 360 MMBF/YR

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 AR Caney Creek 100km - 50km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide -0.7000 (Tons/Year)
Nitrogen Oxides (NOx) -2.9000 (Tons/Year)
Particulate Matter (PM) -0.4000 (Tons/Year)
Sulfur Oxides (SOx) -0.3000 (Tons/Year)
Volatile Organic Compounds (VOC) 165.8000 (Tons/Year)

#### Process/Pollutant Information

PROCESS Continuous Drying Kilns

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 360.00 MMBF

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

 Emission Limit 1:
 3.5000 LB/MBF

 Emission Limit 2:
 630.0000 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: LA-0332 (final) Date Determination

Last Updated:

 Corporate/Company Name:
 MARTCO, LLC
 Permit Number:
 PSD-LA-784(M1)

 Facility Name:
 CHOPIN MILL
 Permit Date:
 12/20/2018 (actual)

Facility Contact:JOE MACKAY 318-379-2855 JOE.MACKAY@ROYOMARTIN.COMFRS Number:Not FoundFacility Description:Plywood Manufacturing FacilitySIC Code:2436

Permit Type: U: Unspecified NAICS Code: 321212

Permit URL: http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=11446100&ob=yes

06/19/2019

7/16/2020 Format RBLC Report

6 COUNTRY: USA **EPA Region:** 

NATCHITOCHES **Facility County:** 

LA **Facility State: Facility ZIP Code:** 71447

LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name) Permit Issued By:

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Mr. Dan Nguyen; (225)219-3181 Other Agency Contact Info:

Add Lumber Dry Kiln No. 3 to increase the annual mill throughput from 25 to 50 million board feet. **Permit Notes:** 

# Process/Pollutant Information

PROCESS Lumber Dry Kiln No. 3

NAME:

**Process Type:** 30.310 (Plywood Dryers)

**Primary Fuel:** Natural Gas 12.00 MM BTU/h Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC **Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.2500 LB/MBF 12 MONTH ROLLING AVERAGE

**Emission Limit 2:** 29.1700 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements: OPERATING PERMIT **Control Method:** (P) Good operating practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Lumber Dry Kiln No. 1 through 3 are capped under Lumber Dry Kiln CAP.

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**Facility Information** 

AR-0157 (final) **RBLC ID: Date Determination** 

Last Updated: 03/08/2019

POTLATCHDELTIC MANUFACTURING L.L.C. 0697-AOP-R18 **Permit Number:** Corporate/Company Name: POTLATCHDELTIC MANUFACTURING L.L.C. -WALDO MILL 11/29/2018 (actual) Permit Date: **Facility Name:** JIM PHILLIPS 8708816425 JIM PHILLIPS@DELTIC.COM 110017420487 FRS Number: **Facility Contact:** 

2411 **Facility Description:** SIC Code: 321113 C: Modify process at existing facility Permit Type: **NAICS Code:** 

https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0697-AOP-R18.pdf Permit URL:

USA COUNTRY: **EPA Region:** 

COLUMBIA **Facility County:** 

AR **Facility State: Facility ZIP Code:** 71770

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

POTLATCHDELTIC WILL INCREASE MAXIMUM HOURLY CAPACITY OF A DRYING KILN FROM 13.2 MBF/HR TO 13.82 Permit Notes: MBF/HR, REPLACE A STEAM HEATED CONTINUOUS KILN WITH A NEW STEAM HEATED CONTINUOUS KILN, REMOVE

ANNUAL PRODUCTION LIMITS ON TWO DRYING KILNS, INCREASE ANNUAL PRODUCTION LIMITS FROM 285

MMBF/YR TO 300 MMBF/HR, REMOVE A PLANER MILL CYCLONE, AND REPLACE A PLANER MILL CYCLONE.

7/16/2020 Format RBLC Report

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** 

CLASS1 100km - 50km AR Caney Creek

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

61.3000 (Tons/Year) Carbon Monoxide 38.7000 (Tons/Year) Nitrogen Oxides (NOx) Particulate Matter (PM) 65.5000 (Tons/Year) Sulfur Oxides (SOx) 3.3000 (Tons/Year) Volatile Organic Compounds (VOC) 35.4000 (Tons/Year)

#### Process/Pollutant Information

PROCESS Continuous Drying Kilns

NAME:

30.800 (Wood Lumber Kilns)

**Process Type: Primary Fuel:** 

300.00 MMBF Throughput:

**Process Notes:** Indirect-Fired, Steam-Heated

> **POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number: Test Method:** Unspecified

(Volatile Organic Compounds (VOC) Pollutant Group(s):

**Emission Limit 1:** 3.5000 LB/MBF 543.2000 T/YR **Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

BACT-PSD Case-by-Case Basis:

Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

Previous Page

#### **Facility Information**

LA-0335 (draft) **Date Determination RBLC ID:** 

08/14/2019 Last Updated:

WEST FRASER TIMBER COMPANY PSD-LA-701(M-2) Corporate/Company Name: **Permit Number:** JOYCE MILL 10/04/2018 (actual) **Facility Name: Permit Date:** 110006524939

**Facility Contact:** BILLY BELL 318-648-3300 FRS Number:

An existing sawmill. eliminate the bottle-neck at the sorter 2421 SIC Code: **Facility Description:** 321113 **Permit Type:** C: Modify process at existing facility **NAICS Code:** 

Permit URL:

COUNTRY: USA **EPA Region:** 

WINN **Facility County:** LA **Facility State:** 71440 **Facility ZIP Code:** 

LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name) Permit Issued By:

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Permit Writer: Cathy Wilson (225)219-3585 Other Agency Contact Info:

**Permit Notes:** 

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

1241.0000 (Tons/Year) Carbon Monoxide Nitrogen Oxides (NOx) 303.0000 (Tons/Year)

7/16/2020 Format RBLC Report

Particulate Matter (PM) 39.0000 (Tons/Year)
Sulfur Oxides (SOx) 34.0000 (Tons/Year)
Volatile Organic Compounds (VOC) 951.0000 (Tons/Year)

Process/Pollutant Information

PROCESS EQT003 Kipper Boiler No. 1 (74A)

NAME:

Process Type: 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: wood residue
Throughput: 58.30 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10
Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 105.5300 LB/H (NOT CHANGED)

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS EQT0005 McBurney Boiler No. 4 (75A)

NAME:

**Process Type:** 12.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: wood residue
Throughput: 154.20 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10
Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 279.1200 LB/H

Emission Limit 1: 2/9.1200 LB/.

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

**PROCESS** GRP0003 Lumber kilns (AK1)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 300.00 million board feet/yr

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.2000 LB/MBF **Emission Limit 2:** 300.0000 MMBF/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) properly design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

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# **Facility Information**

RBLC ID: SC-0185 (final) Date Determination

Corporate/Company Name: CANFOR SOUTHERN PINE Last Updated: 04/04/2019

Permit Number: 1380-0025-CL

Facility Name: CANFOR SOUTHERN PINE - CAMDEN PLANT Permit Date: 09/06/2018 (actual)
Facility Contact: RICK STARNES RICK.STARNES@CANFOR.COM FRS Number: 110000351869

Facility Description: Canfor Southern Pine – Camden Plant is a lumber mill that produces structural SIC Code: 2421

lumber from pine logs. The facility operations include debarking, sawing, steam generation, kiln drying, and planing. The facility currently has five (5) steam-heated, batch lumber drying kilns, one (1) direct-fired, continuous lumber drying kiln, one (1) wood residual boiler, one (1) log debarker, and the planer mill. The wood residual boiler is rated at 98.3 million British Thermal Units per hour (MMBtu/hr) with a multiclone and electrostatic precipitator equipped for emissions controls. The steam-heated, batch lumber drying kilns are rated at 55.8 million board-feet per year (MMbd-ft/yr) for Kiln 1, 55.8 MMbd-ft/yr for Kiln 2, 32 MMbd-ft/yr for Kiln 3, 27 MMbd-ft/yr for Kiln 4, and 11.5 MMbd-ft/yr for Kiln 5. The direct-fired continuous kiln is rated at 80.0 MMbd-ft/yr with a 35 MMBtu/hr burner designed to combust green sawdust. The maximum process capacity for the existing debarker is 200 tons per hour and the planer mill is 80 thousand board feet

per hour (MBF/hr).

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: KERSHAW

Facility State: SC Facility ZIP Code: 29032

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

**Permit Notes:** 

## Process/Pollutant Information

**PROCESS** Lumber Drying Kiln 7

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Sawdust

Throughput: 110.00 MMbd-ft/yr

Process Notes: The new direct-fired, continuous lumber drying kiln (DKN7), has a design capacity of 110.0 million board feet per year (MMBd-ft/yr) the associated

burner assembly for this new kiln has a maximum heat input of 40 MMBtu/hr and is designed to burn green sawdust and bark.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 5.8200 LB/1000 BD-FT VOC AS TERPENE + METHANOL + FORMALDEHYDE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** MACT

Control Method: (P) Volatile Organic Compounds (VOC) Best Available Control Technology (BACT) for the continuous lumber

drying kiln, KLN7, is work practice standards. VOC emissions are based on an emission factor of 5.82 lb

VOC/1000 bd-ft (as terpene + methanol + formaldehyde)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: IN-0290 (final) Date Determination

Last Updated:

Corporate/Company Name: NEW NGC, INC. DBA NATIONAL GYPSUM COMPANY
Facility Name: NEW NGC, INC. DBA NATIONAL GYPSUM COMPANY

Facility Contact: JEFF HAWK (812) 247-2424 JSHAWK@NATIONALGYPSUM.COM FRS Number: 110040897269

Facility Description: A stationary gypsum wallboard manufacturing plant. SIC Code: 3275

Permit Type: C: Modify process at existing facility NAICS Code: 327420

Permit URL:

EPA Region: 5 COUNTRY: USA

Facility County: MARTIN
Facility State: IN
Facility ZIP Code: 47581

Permit Issued By: INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name)

MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 6.8400 (Tons/Year)

Process/Pollutant Information

PROCESS board, kiln, dryer

NAME:

Process Type: 90.019 (Lime/Limestone Handling/Kilns/Storage/Manufacturing)

Primary Fuel: NATURAL GAS
Throughput: 433000.00 T/YR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

08/16/2018

Permit Number:

**Permit Date:** 

101-39817-00003

08/13/2018 (actual)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.1000 LB/T **Emission Limit 2:** 400000.0000 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

 $\label{eq:control} \begin{tabular}{ll} \textbf{Other Applicable Requirements:} \\ \textbf{Control Method:} \end{tabular} \begin{tabular}{ll} (N) \end{tabular}$ 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: WHEN DRYING REGULAR WALLBOARD: (1) VOC EMISSIONS SHALL NOT EXCEED 0.1 POUNDS

PER TON OF REGULAR WALLBOARD DRIED. (2) THE REGULAR WALLBOARD DRYING RATE SHALL NOT EXCEED 400,000 TONS PER TWELVE (12) CONSECUTIVE MONTH PERIOD WITH COMPLIANCE DETERMINED AT THE END OF EACH MONTH. WHEN DRYING SILICONE XP WALLBOARD: (1) VOC EMISSIONS SHALL NOT EXCEED 0.331 POUNDS PER TON OF SILICONE XP WALLBOARD DRIED. (2) THE SILICONE XP WALLBOARD DRYING RATE SHALL NOT EXCEED

 $345,\!000$  Tons per twelve (12) consecutive month period with compliance

DETERMINED AT THE END OF EACH MONTH.

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**Facility Information** 

RBLC ID: AR-0154 (final) Date Determination

Corporate/Company Name: ANTHONY TIMBERLANDS, INC Permit Number: 08/02/2018 (actual)

Facility Name: ANTHONY TIMBERLANDS, INC Permit Date: 08/02/2018 (actual)

Facility Contact:WILSON ANTHONYFRS Number:Not FoundFacility Description:SawmillSIC Code:2411

**Permit Type:** C: Modify process at existing facility

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: OUACHITA

Facility State: AR
Facility ZIP Code: 71720

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

**Permit Notes:** 

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 AR Caney Creek 100km - 50km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 644.8000 (Tons/Year)
Nitrogen Oxides (NOx) 170.2000 (Tons/Year)
Particulate Matter (PM) 181.5000 (Tons/Year)
Sulfur Oxides (SOx) 16.2000 (Tons/Year)
Volatile Organic Compounds (VOC) 391.8000 (Tons/Year)

# Process/Pollutant Information

PROCESS Continuos Drying Kiln

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 200.00 MMBF

**Process Notes:** 

321113

**NAICS Code:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

VOC CAS Number: Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 36.8000 LB/HR VOC **Emission Limit 2:** 350.0000 TPY VOC

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

BACT-PSD Case-by-Case Basis:

Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown 3.5 lb VOC/MBF **Pollutant/Compliance Notes:** 

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**Facility Information** 

TX-0842 (final) **RBLC ID: Date Determination** 

> 02/19/2019 Last Updated:

SIC Code:

WEST FRASER WOOD PRODUCTS Permit Number: 6729, Corporate/Company Name:

PSDTX1526, AND GHGPSDTX1

LUMBER MILL 06/15/2018 **Facility Name:** Permit Date: RAYMOND MITCHELL 903-655-1109 FRS Number:

(actual) Not Entered

2421

major "Greenfield" expansion at the Henderson Mill. This expansion project consists of full **Facility Description:** 

replacement of the green end sawmill and lumber drying equipment. All existing equipment other than the planer building will be shutdown and new sawmill and lumber drying equipment will be installed. The lumber drying and energy system will include two continuous kilns (EPN CK01 and CK02) heated with thermal hot oil, produced with a wood-fired Thermal Oil

Heating System (TOHS) (EPN HTR1).

A: New/Greenfield Facility 321113 **NAICS Code:** Permit Type:

Permit URL:

**Facility Contact:** 

6 **COUNTRY:** USA **EPA Region:** 

RUSK **Facility County: Facility State:** TX

**Facility ZIP Code:** 

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) Permit Issued By:

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

Other Agency Contact Info:

Mr. Bill Moody, P.E., (512) 239-1859, Bill.Moody@tceq.texas.gov

Permit Notes:

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** CLASS1 AR Caney Creek > 250 km

Process/Pollutant Information

**PROCESS** Kilns (EPNs CK01 and CK02)

NAME:

**Process Type:** 

30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 25.00 MBF/KILN

**Process Notes:** 2 KILNS

> **POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.3800 LB / DBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ Y$ 

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: MACT

Control Method: (P) Proper design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown
Pollutant/Compliance Notes: MACT DDDD

#### Process/Pollutant Information

PROCESS Thermal Oil Heating System (TOHS) (EPN HTR1)

NAME:

**Process Type:** 12.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: BIOMASS

**Throughput:** 149.25 MMBTU / HR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0280 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NSPS, MACT

Control Method: (P) proper design and operating practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NSPS Db, MACT DDDDD

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.5050 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NSPS, MACT

Control Method: (P) proper design and operating practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Unspecified

Pollutant Group(s): ( Greenhouse Gasses (GHG) )
Emission Limit 1: 206.8000 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) fuel cell or hybrid suspension grate unit design, firing biomass as the only fuel source, and the operation of

several energy efficiency options

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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# **Facility Information**

RBLC ID: LA-0338 (draft) Date Determination

Last Updated: 08/14/2019
Permit Number: PSD-LA-830

Corporate/Company Name:HUNT FOREST PRODUCTS, LLCPermit Number:PSD-LA-830Facility Name:URANIA SAWMILLPermit Date:05/08/2018 (actual)

Facility Contact: RICHIE LEBLANC FRS Number: not found

Facility Description: SIC Code: 2421

Permit Type:A: New/Greenfield FacilityNAICS Code:321113

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: LASALLE
Facility State: LA
Facility ZIP Code: 71480

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Permit Writer: Qingming Zhang 225-219-3457

**Permit Notes:** 

#### Process/Pollutant Information

**PROCESS** Lumber Drying Kilns (K-1, K-2, K3)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Steam

**Throughput:** 45.00 MMBTU/hr

Process Notes: each kiln

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) proper maintenance and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: SC-0184 (final) Date Determination
Last Updated:

Corporate/Company Name:NEW SOUTH LUMBER COMPANYPermit Number:0820-0045-CLFacility Name:NSLC - DARLINGTONPermit Date:02/06/2018 (actual)

Facility Contact: BRIAN TOOKE 843-944-8111 BRIAN.TOOKE@CANFOR.COM FRS Number: 110007026903

Facility Description: New South Lumber Company – Darlington Inc. (New South) operates a lumber

mill at 1100 Chesterfield Lumber Drive in Darlington, South Carolina. The New South facility produces structural lumber from southern yellow pine logs and is an existing major source under Prevention of Significant Deterioration (PSD) and Title

V. Operations at the New South facility include debarking, sawing, steam

generation, kiln drying, and planing.

Permit Type: D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 321113

acility)

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: DARLINGTON

Facility State: SC Facility ZIP Code: 29532

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Permit Notes: New South plans to install a new natural gas, direct-fired, continuous lumber drying kiln to supplement the drying capacity currently

provided by the two (2) green sawdust, direct-fried, continuous lumber drying kilns. Following the construction of the new kiln (KLN7), the remaining wood waste-fired boiler and all four (4) steam heated batch kilns will be shut down permanently. The proposed project will

increase the site's drying capacity from 235.7 million board-foot per year (MMbd-ft/yr.) to 250.0 MMbd-ft/yr.

#### Process/Pollutant Information

**PROCESS** Lumber Drying Kiln 7

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Natural Gas
Throughput: 80.00 MMbd-ft/yr

Process Notes: Continuous Lumber Drying Kiln with a throughput capacity of 80 MMbd-ft/yr. Heat is provided by a 30 MMBtu/hr natural gas fired burner.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 4.2000 LB VOC/1000 BD-FT VOC AS TERPENE + METHANOL + FORMALDEHYDE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: MACT

Control Method: (P) Volatile Organic Compounds (VOC) best available control technology for the continuous lumber drying kiln,

KLN7, is work practice standards. VOC emissions are based on an emissions factor of 4.2 lb VOC/1000 bd-ft (as

terpene +methanol + formaldehyde).

04/04/2019

2421

SIC Code:

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

AR-0148 (final) **RBLC ID: Date Determination** 

Last Updated: Permit Number:

03/23/2018 0189-AOP-R8

Corporate/Company Name: CADDO RIVER LLC **Facility Name:** 

Permit Date: 01/29/2018 (actual) 110000597774 FRS Number:

BRETT BRAY (479) 857-9902 BRETT.BRAY@CADDORIVERFP.COM **Facility Contact: Facility Description:** 

2421 SIC Code:

C: Modify process at existing facility **Permit Type:** 

321113 **NAICS Code:** 

https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/0189-AOP-R8.pdf

**EPA Region:** 

CADDO RIVER LLC

USA **COUNTRY:** 

PIKE **Facility County:** AR **Facility State:** 71943 **Facility ZIP Code:** 

ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name) Permit Issued By:

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Joseph Hurt Other Agency Contact Info:

Phone: (501) 682-0733 Email: hurtj@adeq.state.ar.us

**Permit Notes:** 

Permit URL:

Affected Boundaries: **Boundary Type:** Class 1 Area State: **Boundary:** Distance: CLASS1 AR Caney Creek < 100 km

CLASS1 MO Hercules-Glades > 250 km CLASS1 MO Mingo > 250 km CLASS1 Upper Buffalo 100km - 50km AR

**Facility-wide Emissions Increase: Pollutant Name: Facility-wide Emissions:** 

Carbon Monoxide 80.9000 (Tons/Year) Nitrogen Oxides (NOx) 26.5000 (Tons/Year) Particulate Matter (PM) 55.7000 (Tons/Year) Sulfur Oxides (SOx) 8.1000 (Tons/Year) Volatile Organic Compounds (VOC) 351.7000 (Tons/Year)

Process/Pollutant Information

PROCESS Dual Path Kiln #3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Wood

Throughput: 185000.00 MBF

The 185,000 MBF throughput is a combined kiln annual throughput through two dual path kilns (sources, SN-04 and SN-04A). **Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Unspecified

(Volatile Organic Compounds (VOC)) Pollutant Group(s):

**Emission Limit 1:** 3.8000 LB/MBF **Emission Limit 2:** 53.2000 LB/HR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS DPK # 3 Abort Stack

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Wood
Throughput: 2000.00 lb

Process Notes: 2,000 pounds of wood per hour with 1,200 gallons per rolling 12-months of diesel. Operating hours limited to 240 hours per rolling 12-months

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0170 LB/MMBTU
Emission Limit 2: 0.2000 LB/HR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: AL-0318 (draft) Date Determination

Corporate/Company Name: GEORGIA PACIFIC WOOD PRODUCTS, LLC Last Updated: 10/11/2019

Permit Number: 309-0075

Facility Name: TALLADEGA SAWMILL Permit Date: 12/18/2017 (actual)

Facility Contact:JOE GORSKI 404-652-6455 JOE.GORSKI@GAPAC.COMFRS Number:Not FoundFacility Description:A sawmill that produces kiln dried dimensional lumber.SIC Code:2421Permit Type:A: New/Greenfield FacilityNAICS Code:321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: TALLADEGA COUNTY

Facility State: AL Facility ZIP Code: 35160

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Other Agency Contact Info: Chris Ailor

ceailor@adem.alabama.gov

334-271-7813

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 40.1000 (Tons/Year)

7/16/2020 Format RBLC Report

> Nitrogen Oxides (NOx) 31.2000 (Tons/Year) Particulate Matter (PM) 23.7400 (Tons/Year) Sulfur Oxides (SOx) 0.4100 (Tons/Year) 684.9600 (Tons/Year)

Volatile Organic Compounds (VOC)

Process/Pollutant Information

**PROCESS** NAME:

Sawmill and Green End Operations

**Process Type:** 30.999 (Other Wood Products Industry Sources)

**Primary Fuel:** N/A

Throughput: 656000.00 lb/hr

**Process Notes:** log debarker, log bucking, sawmille, chip conveyance, bark conveyance, chip cyclone, chip pile, sawdust conveyance, and roads.

**POLLUTANT NAME:** Particulate matter, total (TPM)

PM **CAS Number:** 

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

**Test Method:** Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

**CAS Number:** PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS

Dry Kiln 1

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: natural gas
Throughput: 343530.00 MCF/hr

Process Notes: 120,000 MBf/yr rough green lumber feed input. 320,000 MBf/yr dried lumber produced (production bubble containing all three kilns)

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3300 LB/HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 5.4900 LB/MBF AS WPP1 VOC

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Oxides (SOx)

CAS Number: 7446
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methanol
CAS Number: 67-56-1
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Phenol
CAS Number: 108-95-2
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)
Fet. % Efficiency:

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Formaldehyde
CAS Number: 50-00-0
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: N/A Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

0 \$/ton

**Cost Effectiveness: Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Acetaldehyde 75-07-0 **CAS Number: Test Method:** Unspecified

Pollutant Group(s): ( Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Acrolein **CAS Number:** 107-02-8 **Test Method:** Unspecified

Pollutant Group(s): ( Hazardous Air Pollutants (HAP), Volatile Organic Compounds (VOC))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes:

# Process/Pollutant Information

**PROCESS** Dry Kiln 2

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** Natural Gas 343530.00 MCF/hr Throughput:

**Process Notes:** 120,000 MBf/yr rough green lumber feed input. 320,000 MBf/yr dried lumber produced (production bubble containing all three kilns)

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.3300 LB/HR

**Emission Limit 2: Standard Emission:**  Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** OTHER CASE-BY-CASE **Other Applicable Requirements:** SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.4900 LB/MBF AS WPP1 VOC

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Oxides (SOx)

CAS Number: 7446
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methanol
CAS Number: 67-56-1
Test Method: Unspecified

Pollutant Group(s): ( Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Phenol
CAS Number: 108-95-2
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Formaldehyde

CAS Number: 50-00-0

Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Acetaldehyde
CAS Number: 75-07-0
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Acrolein
CAS Number: 107-02-8
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS Dry Kiln 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Natural Gas
Throughput: 257648.00 MCF/hr

Process Notes: 80,000 MBf/yr rough green lumber feed input. 320,000 MBf/yr dried lumber produced (production bubble containing all three kilns)

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2300 LB/HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

 Case-by-Case Basis:
 OTHER CASE-BY-CASE

 Other Applicable Requirements:
 OPERATING PERMIT, SIP

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.4900 LB/MBF AS WPP1 VOC

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Oxides (SOx)

CAS Number: 7446
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methanol
CAS Number: 67-56-1
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Phenol
CAS Number: 108-95-2
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Formaldehyde

CAS Number: 50-00-0
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Acetaldehyde
CAS Number: 75-07-0
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Acrolein
CAS Number: 107-02-8
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS Planer Mill and Finished End Operations

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel: N/A

**Throughput:** 320.00 MMBf/yr

Process Notes: 320MMBf/yr dried finished lumber produced. 64,000 tpy shavings produced.

POLLUTANT NAME: Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3700 LB/HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE
Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** 250 Hp Emergency CI, Diesel-fired RICE

NAME:

Process Type: 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** Diesel **Throughput:** 0

Process Notes: Emergency Only

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Oxides (SOx)

CAS Number: 7446
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Formaldehyde

CAS Number: 50-00-0

Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Acetaldehyde
CAS Number: 75-07-0
Test Method: Unspecified

Pollutant Group(s): (Hazardous Air Pollutants (HAP), Organic Compounds (all), Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: N/A
Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Previous Page

**Facility Information** 

RBLC ID: SC-0181 (final) Date Determination

Last Updated:

10/04/2018

Corporate/Company Name: RESOLUTE FP US INC.

Permit Number: 2440-0216-CA

7/16/2020 Format RBLC Report

Facility Name: RESOLUTE FP US INC. - CATAWBA LUMBER MILL Permit Date: 11/03/2017 (actual)

Facility Contact: KENT CUMBERTON 423-336- FRS Number: 110000355035

7992 KENT.CUMBERTON@RESOLUTEFP.COM

Facility Description: Resolute has applied to construct a new lumber mill co-located with the existing SIC Code: 2421

pulp and paper facility. The lumber mill includes a log yard, sawmill, 3 direct-fired

continuous lumber drying kilns, planer mill, and associated material handling. The

lumber kilns use gasified green sawdust as fuel.

Permit Type: A: New/Greenfield Facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: YORK
Facility State: SC
Facility ZIP Code: 29704

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Permit Notes:

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 117.0600 (Tons/Year)
Nitrogen Oxides (NOx) 36.0500 (Tons/Year)
Particulate Matter (PM) 35.7000 (Tons/Year)
Sulfur Oxides (SOx) 11.6200 (Tons/Year)
Volatile Organic Compounds (VOC) 909.4600 (Tons/Year)

#### Process/Pollutant Information

**PROCESS** 3 Continuous Direct-Fired Lumber Kilns, CDK1, CDK2, CDK3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: green sawdust
Throughput: 104.17 MM BF/YR

Process Notes: Each kiln has a throughput of 104.17 million BF/yr. Each kiln is rated at 35.0 million Btu/hr.

POLLUTANT NAME: Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1400 LB/M BF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Emission limits are for each kiln.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.1040 LB/ M BF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The emission limit is for each kiln.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0990 LB/ M BF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The emission limit is for each kiln.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 5.8200 LB/M BF VOC AS TERPENE+METHANOL+FORMALDEHYDE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The emission limit is for each kiln.

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.7300 LB/M BF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Dioxide
CAS Number: 124-38-9

Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 206.7900 LB/MMBTU 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Energy efficient design

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0159 LB/MMBTU 3 HOUR AVARAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Energy efficient design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): ( Greenhouse Gasses (GHG) , InOrganic Compounds , Oxides of Nitrogen (NOx) , Particulate Matter (PM) )

**Emission Limit 1:** 0.0079 LB/MMBTU 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Energy efficient design

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS Debarking

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

 $Pollutant \ Group(s): \qquad \qquad (\ Particulate \ Matter \ (PM)\ )$ 

**Emission Limit 1:** 0.0010 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) Enclosure of operations and proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0004 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Enclosure of operations and proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: 0.0002 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Enclosure of operations and good maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS Log Sawing

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:

Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Enclosure of operations and proper maintenance and good operating practice.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0004 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) Enclosure of operations and proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.0002 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Enclosure of operations and proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

**PROCESS** 3 Kiln Fuel Silos, KFS-1, KFS-2, KFS-3

NAME:

**Process Type:** 99.999 (Other Miscellaneous Sources)

Primary Fuel:
Throughput: 0

**Process Notes:** Three silos are used to store fuel for the kilns.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.0100 GR/DSCF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) Proper maintenance and good operating practices, including inherent cyclones.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0035 GR/DSCF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) Proper maintenance and good operating practices, including inherent cyclones.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

Emission Limit 1: 0.0011 GR/DSCF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Proper maintenance and good operating practices, including inherent cyclones.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

# Process/Pollutant Information

**PROCESS** Dry Shavings Storage Silo

NAME:

**Process Type:** 99.999 (Other Miscellaneous Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: 0.0020 GR/DSCF 3 HOUR AVERAGE

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: SIP

**Control Method:** (P) Proper maintenance and good operating practices, including inherent bin vent filter.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0007 LB/DSCF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Proper maintenance and good operating practices, including inherent bin vent filter.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Proper maintenance and good operating practices, including inherent bin vent filter.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS Planer Mill

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Throughput: 0

**Process Notes:** 

**Primary Fuel:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Baghouse
Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Baghouse
Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Baghouse
Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS Material Transfer

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:
Throughput:

Process Notes: Includes loading and transferring of chips, bark, and shavings.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0012 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) Proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0001 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Proper maintenance and good operating practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS Roads

NAME:

**Process Type:** 99.140 (Paved Roads)

Primary Fuel:

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1300 LB/VMT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) Good housekeeping practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  10  $\mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0300 LB/VMT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Good housekeeping practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 LB/VMT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Good housekeeping practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

TX-0829 (final) **RBLC ID: Date Determination** 

04/18/2018 Last Updated: GEORGIA-PACIFIC WOOD PRODUCTS SOUTH LLC Corporate/Company Name:

17395 AND **Permit Number:** PSDTX1008M2

LUMBER MANUFACTURING PLANT 11/02/2017 (actual) **Facility Name:** Permit Date:

BILL ECKMANN 936-829-1292 Not Found **Facility Contact:** FRS Number: 2421 Lumber Manufacturing Plant **Facility Description:** SIC Code: C: Modify process at existing facility 321213 Permit Type: **NAICS Code:** 

Permit URL:

6 USA **COUNTRY: EPA Region:** 

ANGELINA **Facility County:** 

TX**Facility State:** 

**Facility ZIP Code:** 

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) Permit Issued By:

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

Mr. Patrick Agumadu, P.E., (512) 239-1271, Patrick.Agumadu@tceq.texas.gov Other Agency Contact Info:

**Permit Notes:** 

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** 

CLASS1 ΤX Big Bend NP > 250 km

# Process/Pollutant Information

PROCESS Steam-Heated Kilns

NAME:

**Process Type:** 

19.600 (Misc. Boilers, Furnaces, Heaters)

**Primary Fuel:** wood

62500.00 MBF/YR/KILN Throughput:

**Process Notes:** A wood-fired boiler supplies steam to the kilns for drying the lumber

> POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number:

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 5.7360 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

BACT-PSD Case-by-Case Basis: Other Applicable Requirements: MACT

**Control Method:** (P) Proper design and good operating practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** VOC emission factor of 5.736 lb/MBF based on Wood Products Protocol No. 1 (WPP1)

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**Facility Information** 

AR-0147 (final) **RBLC ID: Date Determination** 

Last Updated:

03/23/2018

1681-AOP-R15

**Permit Date:** 

FRS Number:

SIC Code:

10/02/2017 (actual)

110001702346

2421

Corporate/Company Name: **Permit Number:** ANTHONY FOREST PRODUCTS COMPANY, LLC

**Facility Name:** 

RANDY EVANS (870) 962-3206 REVANS@CANFOR.COM **Facility Contact:** 

Anthony Forest Products Company operates a sawmill and ancillary operations in **Facility Description:** 

Urbana, Arkansas. The physical address of the facility is 1236 Urbana Road, El Dorado, AR 71768. The facility falls under Standard Industrial Classification code (SIC) 2421, Sawmills and Planing Mills, General, and North American Industry Classification System code (NAICS) 321113, Sawmills. Raw materials (pine logs) are delivered to the facility by contractor log trucks on facility Haul Roads (SN-20). These logs are routed directly to sawmill log decks, dry runs, or to wet-log storage. Water is sprayed onto the logs in the wet log storage area to prevent stain and insect damage. Logs are taken by truck to the Sawmill (SN-06) where they are debarked. Bark is collected and eventually loaded into tractor trailers to be shipped off-site. Debarked logs enter the Sawmill Building to be sawed into cants, or rough lumber, and edged and trimmed. Trimmings and edgings are routed to a chipper. Chips are mechanically conveyed to shaker screens where oversized chips and fines are removed. The chips are belt conveyed to a chip bin or chip overflow pile and eventually loaded into tractor trailers to be shipped off-site. Oversized chips are routed back through the chipper. Sawdust is collected from sources within the Sawmill Building and blown to the Fuel Storage Silo or overflow sawdust pile. The Fuel Storage Silo is included as an Insignificant Activity; it will primarily be filled from the Sawmill Building collections, but can be filled by purchased sawdust. Emissions from the chip bin and byproduct storage piles are estimated as Insignificant Activities. From the Sawmill, the green lumber is stacked and stored. The lumber is then dried in kilns. The facility utilizes three dual path kilns (DPK), DPK #1 (SN-23), DPK #2 (SN-14), and DPK #3 (SN-27). The DPKs allow for continuous drying operation as stacks of green wood move through the kilns on two

parallel tracks. The bundles of lumber on

B: Add new process to existing facility 321113 **NAICS Code:** Permit Type:

https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1681-AOP-R15.pdf Permit URL:

USA **EPA Region: COUNTRY:** 

UNION COUNTY **Facility County:** 

AR **Facility State:** 71765 **Facility ZIP Code:** 

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

**Permit Notes:** 

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

Carbon Monoxide 83.6000 (Tons/Year) Nitrogen Oxides (NOx) 22.4000 (Tons/Year) Particulate Matter (PM) -59.1000 (Tons/Year) Sulfur Oxides (SOx) 3.6000 (Tons/Year) 140.1000 (Tons/Year) Volatile Organic Compounds (VOC)

#### Process/Pollutant Information

**PROCESS** Dual Path Kiln #3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** sawdust

Throughput: 31.50 MMBtu/hr

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.8000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD** Case-by-Case Basis:

Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: AL-0310 (final) Date Determination

**Last Updated:** 11/30/2017

Corporate/Company Name:SCOTCH GULF LUMBER, LLCPermit Number:X007 & X008Facility Name:FULTON SAWMILLPermit Date:06/08/2017 (actual)

Facility Contact:PHIL WITTER 2514576872 PHIL.WITTER@CANFOR.COMFRS Number:Not FoundFacility Description:EXISTING, SOUTHERN YELLOW PINE SAWMILL WITH PLANER MILLSIC Code:2421

AND LUMBER DRYING KILNSX007: 11.4 MBF/HR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN WITH 40 MMBTU/HR NATURAL GAS-FIRED BURNER AND ASSOCIATED 4 MMBTU/HR NATURAL GAS-FIRED KILN CONDENSATE EVAPORATOR X008: PLANER MILL WITH PNEUMATIC

CONVEYANCE SYSTEM AND CYCLONE

Permit Type: B: Add new process to existing facility NAICS Code: 321113

Permit URL: HTTP:

EPA Region: 4 COUNTRY: USA

Facility County: CLARKE
Facility State: AL
Facility ZIP Code: 36446

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Other Agency Contact Info: RACHAEL BROADWAY 334-271-7901

Permit Notes: X007: 11.4 MBF/HR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN WITH 40 MMBTU/HR NATURAL GAS-FIRED

BURNER AND ASSOCIATED 4 MMBTU/HR NATURAL GAS-FIRED KILN CONDENSATE EVAPORATOR X008: PLANER

MILL WITH PNEUMATIC CONVEYANCE SYSTEM AND CYCLONE

Process/Pollutant Information

PROCESS 11.4 MBF/HR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN, 40 MMBTU/HR NATURAL GAS BURNER, & 4 MMBTU/HR

NAME: NATURAL GAS CONDENSATE EVAPORATOR

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: NATURAL GAS
Throughput: 11.40 MBF/H

Process Notes: A DIRECT FIRED CONTINUOUS KILN (CDK) WHICH IS HEATED BY A 40 MMBTU/HR NATURAL GAS BURNER. KILN CONDENSATE

FROM THE CDK IS SENT TO A CONDENSATE EVAPORATOR. THE EVAPORATOR IS HEATED BY A 4 MMBTU/HR NATURAL GAS

BURNER.

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: SIP
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Other

Other Test Method:

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.0000 LB/MBF MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (N) BACT DETERMINED AS PROPER KILN OPERATION AND MAINTENANCE PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: VOC MEASURED AS WPP1, WHERE WPP1 = [(VOC AS C) X 1.13] FORMALDEHYDE [0.35 X

METHANOL]

## Process/Pollutant Information

PROCESS PLANER MILL WITH PNEUMATIC CONVEYANCE SYSTEM AND CYCLONE

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

**Primary Fuel:** DRY LUMBER **Throughput:** 240.00 MMBF/YR

Process Notes: THE PLANER MILL IS WHERE KILN DRIED LUMBER IS SENT TO BE PLANED TO FINAL DIMENSIONS, GRADED, AND SORTED

BEFORE BEING STORED FOR SHIPMENT. DRY SHAVINGS FROM THE PLANER MILL ARE COLLECTED AND PNEUMATICALLY

CONVEYED VIA A CYCLONE TO A TRUCK LOADOUT BIN.

POLLUTANT NAME: Particulate matter, total (TPM)

CAS Number: PM

Test Method: EPA/OAR Mthd 5 and 202
Pollutant Group(s): (Particulate Matter (PM))

2 0000 LP/ULIP

**Emission Limit 1:** 3.0000 LB/H HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: SIP, OTHER

Control Method: (A) PNEUMATIC CONVEYANCE SYSTEM WITH CYCLONE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** LIMIT ESTABLISHED TO AVOID BACT FOR PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 2.0000 LB/H HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** SIP, OTHER

Control Method: (A) PNEUMATIC CONVEYANCE SYSTEM WITH CYCLONE

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** EMISSION LIMIT ESTABLISHED TO AVOID BACT FOR PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 1.8000 LB/H HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** SIP, OTHER

Control Method: (A) PNEUMATIC CONVEYANCE SYSTEM WITH CYCLONE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: EMISSION LIMIT ESTABLISHED TO AVOID BACT FOR PM

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# **Facility Information**

RBLC ID: FL-0365 (final) Date Determination

**Last Updated:** 02/19/2019

Corporate/Company Name:GILMAN BUILDING PRODUCTS, LLCPermit Number:1230033-014-ACFacility Name:PERRY MILLPermit Date:04/11/2017 (actual)

Facility Contact: VICTOR GARRETT VICTORGARRETT@GILMANBP.COM FRS Number: 110070147052

Facility Description:Lumber mill with total capacity of 150 MMBF per yearSIC Code:2421Permit Type:B: Add new process to existing facilityNAICS Code:321113

Permit URL: https://arm-permit2k.dep.state.fl.us/nontv/1230033.014.AC.F.ZIP

EPA Region: 4 COUNTRY: USA

Facility County: TAYLOR
Facility State: FL
Facility ZIP Code: 32348

Permit Issued By: FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION (Agency Name)

MR. DAVID READ(Agency Contact) (850) 717-9000 David.Read@dep.state.fl.us

Permit Notes: Technical evaluation available at https://arm-permit2k.dep.state.fl.us/nontv/1230033.014.AC.D.ZIP

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance: CLASS1 FL Saint Marks < 100 km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

 Carbon Monoxide
 22.0000 (Tons/Year)

 Nitrogen Oxides (NOx)
 5.0000 (Tons/Year)

 Particulate Matter (PM)
 9.0000 (Tons/Year)

 Sulfur Oxides (SOx)
 2.0000 (Tons/Year)

 Volatile Organic Compounds (VOC)
 88.0000 (Tons/Year)

# Process/Pollutant Information

PROCESS Direct-Fired Batch Lumber Drying Kiln No. 5

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Waste wood

**Throughput:** 50000.00 MMBF per year

Process Notes: Permitted Capacity: at the applicant's request a restricted maximum production of 50,000 MBF/year on a 12-month rolling period {Note the design

capacity of the kiln is 90,000 MBF/year}. Equipped with a direct-fired burner with a maximum heat input of 40 MMBtu/hour.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 3.5000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (P) Minimization of over-drying

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Product** moisture is surrogate -- no VOC testing required.

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#### **Facility Information**

RBLC ID: AR-0143 (final) Date Determination
Last Updated:

Corporate/Company Name:CADDO RIVER LLCPermit Number:0189-AOP-R6Facility Name:CADDO RIVER LLCPermit Date:02/08/2017 (actual)Facility Contact:BRET GRAY 7074992694FRS Number:110067041766

Facility Description:PINE SAW MILLPINE SAW MILLSIC Code:2421Permit Type:B: Add new process to existing facilityNAICS Code:321113

Permit URL: HTTPS:WWW.ADEQ.STATE.AR.US/HOME/PDSSQL/PDS.ASPX

EPA Region: 6 COUNTRY: USA

Facility County: PIKE
Facility State: AR
Facility ZIP Code: 71943

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Permit Notes: PINE SAW MILL

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 344.0000 (Tons/Year)

# Process/Pollutant Information

PROCESS CONTINUOUS LUMBER DRYING KILNS

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: WOOD

Throughput: 116000000.00 BOARD FEET

**Process Notes:** THROUGHPUT: 116000000 BOARD FEET CONTINUOUS PINE LUMBER DRYING KILN

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

 $Pollutant \ Group(s): \qquad \qquad (\ \ \ Volatile \ Organic \ Compounds \ (VOC)\ )$ 

Emission Limit 1: 53.2000 LB/H

Emission Limit 2: 220.4000 T/YR 12 MONTH ROLLING TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

05/12/2017

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Based on 3.8 lb VOC/MBF

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**Facility Information** 

RBLC ID: SC-0176 (final) Date Determination

Corporate/Company Name: GEORGIA PACIFIC WOOD PRODUCTS LLC Permit Number: 1600-0002-CD

Facility Name: GEORGIA PACIFIC - MCCORMICK SAWMILL Permit Date: 10/27/2016 (actual)

Facility Contact:BRIAN TOOKE 864-465-9553 DAVID.TOOKE@GAPAC.COMFRS Number:Not FoundFacility Description:Georgia Pacific - McCormick Sawmill produces kiln dried dimensional lumberSIC Code:2421

Facility Description: Georgia Pacific - McCormick Sawmill produces kiln driftom southern yellow pine logs.

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: MCCORMICK

Facility State: SC Facility ZIP Code: 29835

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info: Michael G. Daugherty

803-898-4123

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 118.4000 (Tons/Year)

# Process/Pollutant Information

PROCESS Direct fired continuous lumber kiln

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Wood Fired

**Throughput:** 26.00 MMBTU/HR

Process Notes: Kiln is a direct fired continuous lumber kiln fired on green wood and dried shavings. BACT is work practice standards and an emission factor of 5.84

lb VOC/1000 board feet

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** MACT, SIP

Control Method: (N)

Est. % Efficiency:

**Pollutant/Compliance Notes:** Good work practices consisting of target final moisture content of 12% or greater, kiln wet bulb temperature set

 $point\ of\ 195\ degrees\ Fahrenheit\ or\ less,\ etc.\ VOC\ emission\ are\ based\ on\ an\ emission\ factor\ of\ 5.84\ lb\ VOC/1000$ 

board feet (AS THC AS PROPANE + METHANOL + FORMALDEHYDE)

7/16/2020

**Facility Information** 

RBLC ID: SC-0177 (final) Date Determination

**Last Updated:** 08/23/2017

Corporate/Company Name: NEW SOUTH LUMBER COMPANY, INC.

 Permit Number:
 1380-0025-CJ-R1

 Permit Date:
 10/26/2016 (actual)

Facility Name: NEW SOUTH LUMBER COMPANY, INC. - CAMDEN PLANT

FRS Number: 110000351869

Facility Contact: DAY, DON 8038730021 DON.DAY@CANFOR.COM
Facility Description: LUMBER MILL

**SIC Code:** 2421

Facility Description: LUMBER MILL
Permit Type: C: Modify process at existing facility

NAICS Code: 321113

Permit URL:

EPA Region: 4

COUNTRY:

USA

Facility County: KERSHAW

Facility State: SC Facility ZIP Code: 29032

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 29.2000 (Tons/Year)
Nitrogen Oxides (NOx) 11.2000 (Tons/Year)
Particulate Matter (PM) 20.9800 (Tons/Year)
Sulfur Oxides (SOx) 3.8300 (Tons/Year)
Volatile Organic Compounds (VOC) 232.8000 (Tons/Year)

Process/Pollutant Information

PROCESS DKN6 - DIRECT-FIRED CONTINUOUS LUMBER DRYING KILN

NAME:

**Process Type:** 30.008 (Wood Lumber Kilns)

Primary Fuel: WOOD WASTE

Throughput: 80.00 MMBD-FT/YR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) WORK PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** THE PERMIT WAS REVISED TO REMOVE THE BACT LIMIT AND CHANGE THE EMISSION FACTOR

USED TO DETERMINE VOC EMISSIONS. THE PREVIOUS EMISSION FACTOR WAS 3.67 LB/MBD-FT. THE NEW EMISSION FACTOR IS 5.82 LB/MBD-FT. THE LIMIT WAS REMOVED DUE TO THE

INCONSISTENCY IN THE RESULTS FROM TESTING LUMBER KILNS AND THE LACK OF CONTROL DEVICE. THIS IS CONSISTENT WITH HOW THE DEPARTMENT IS NOW TREATING LUMBER KILNS.

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**Facility Information** 

AL-0311 (final) **RBLC ID:** 

**Date Determination** 

11/30/2017 Last Updated: WEYERHAEUSER NR COMPANY X023 **Permit Number:** Corporate/Company Name:

MILLPORT WOOD PRODUCTS FACILITY Permit Date: 08/30/2016 (actual) **Facility Name:** 

CHRIS HOPF 2055961197 CHRISTOPHER.HOPF@WEYERHAEUSER.COM FRS Number: **Facility Contact:** 

SAWMILLADDING CDK-5 (X023B) AND CDK-6 (X023C). RE-PERMITTED **Facility Description:** CDK-4, WHICH UNDERWENT PSD IN 2014 (X022 ISSUED 12/30/2014) AS

X023A TO REFLECT THE CORRECT CAPACITY IN THE DESCRIPTION

AND TO INSTITUTE A SYNTHETIC MINOR LIMIT FOR PM.

D: Both B (Add new process to existing facility) &C (Modify process at existing **Permit Type:** 

321113 **NAICS Code:** 

Not Found

2421

USA

SIC Code:

HTTP:APP.ADEM.ALABAMA.GOV/EFILE/ COUNTRY: **EPA Region:** 

LAMAR **Facility County:** AL **Facility State:** 35576 **Facility ZIP Code:** 

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

ADDING CDK-5 (X023B) AND CDK-6 (X023C). RE-PERMITTED CDK-4, WHICH UNDERWENT PSD IN 2014 (X022 ISSUED **Permit Notes:** 

12/30/2014) AS X023A TO REFLECT THE CORRECT CAPACITY IN THE DESCRIPTION AND TO INSTITUTE A SYNTHETIC

MINOR LIMIT FOR PM.

#### Process/Pollutant Information

**PROCESS** THREE CONTINUOUS DIRECT-FIRED LUMBER DRY KILNS, CDK-4/X023A, CDK-5/X023B, CDK-6/X023C

NAME:

Permit URL:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** WOOD-SAWDUST Throughput: 385.00 MMBF/YR

**Process Notes:** A) 117,000 MBF/YR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN NO. 4 (CDK-4) WITH 35 MMBTU/HR WOOD-FIRED BURNER

> B) 134,000 MBF/YR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN NO. 5(CDK-5) WITH 40 MMBTU/HR WOOD-FIRED BURNER C) 134,000 MBF/YR CONTINUOUS DIRECT-FIRED LUMBER DRY KILN NO. 6(CDK-6) WITH 40 MMBTU/HR WOOD-FIRED BURNER

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

Test Method: EPA/OAR Mthd 25A

(Volatile Organic Compounds (VOC)) **Pollutant Group(s):** 

**Emission Limit 1:** 4.7000 LB/MBF AS WPP1

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

**Control Method:** (N) OPERATING AND MAINTENANCE PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0\$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes:

Previous Page

**Facility Information** 

7/16/2020 Format RBLC Report

FL-0358 (final) 04/28/2017 **RBLC ID: Date Determination** 

Last Updated:

**NAICS Code:** 

321113

0630011-016-AC REX LUMBER, LLC Corporate/Company Name: **Permit Number: Facility Name:** GRACEVILLE LUMBER MILL **Permit Date:** 07/14/2016 (actual)

RANDY CUMMINGS 850-263-2056 RCUMMINGS@REX-LUMBER.COM Not Found FRS Number: **Facility Contact:** 

2421 **Facility Description:** 

This existing facility is a lumber mill. The proposed project involves the SIC Code: construction of a new Kiln No. 5.

C: Modify process at existing facility **Permit Type:** https://arm-permit2k.dep.state.fl.us/nontv/0630011.016.AC.F.ZIP Permit URL:

USA **COUNTRY: EPA Region:** 

JACKSON **Facility County:** FL**Facility State:** 

FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION (Agency Name) Permit Issued By:

MR. DAVID READ(Agency Contact) (850) 717-9000 David.Read@dep.state.fl.us

Draft permit and BACT rationale available at https://arm-permit2k.dep.state.fl.us/nontv/0630011.016.AC.D.ZIP **Permit Notes:** 

Distance: **Affected Boundaries: Boundary Type:** Class 1 Area State: **Boundary:** 

CLASS1 100km - 50km FL. Bradwell Bay CLASS1 FL. Saint Marks 100km - 50km

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

Carbon Monoxide 5.8000 (Tons/Year) Nitrogen Oxides (NOx) 5.4000 (Tons/Year) Particulate Matter (PM) 12.4000 (Tons/Year) 2.4000 (Tons/Year) Sulfur Oxides (SOx) 117.7000 (Tons/Year) Volatile Organic Compounds (VOC)

#### Process/Pollutant Information

**PROCESS** Direct-fired continuous lumber drying Kiln No. 5

32440

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Sawdust

Throughput: 110000.00 Thousand bf/yr

**Process Notes:** 

**Facility ZIP Code:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

3.5000 LB/THOUSAND BF **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD** Case-by-Case Basis: Other Applicable Requirements: MACT

**Control Method:** (P) Lumber moisture used as proxy for VOC emissions -- product that is over dried likely means more VOC

driven off and emitted

Est. % Efficiency:

0 \$/ton **Cost Effectiveness: Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** 

Pollutant/Compliance Notes: No add-on VOC controls. Lumber moisture content testing used as a proxy for VOC. No VOC tests required.

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**Facility Information** 

SC-0166 (final) **RBLC ID: Date Determination** 

Last Updated: 11/02/2017 Format RBLC Report

7/16/2020

NEW SOUTH LUMBER COMPANY - DARLINGTON INC. **Facility Name:** NEW SOUTH LUMBER COMPANY - DARLINGTON INC. **Permit Date:** 

MR. TIM PAPA 8433931211 TIM.PAPA@CANFOR.COM 110061778214 FRS Number: **Facility Contact:** 

NEW SOUTH - DARLINGTON IS A LUMBER MILL THAT PRODUCES **Facility Description:** 

STRUCTURAL LUMBER FROM SOUTHERN YELLOW PINE LOGS.NEW SOUTH - DARLINGTON SUBMITTED AN APPLICATION TO INSTALL A NEW 85 MILLION BD-FT/YR DIRECT-FIRED, CONTINUOUS LUMBER DRYING KILN (KLN6) WITH A 35 MILLION BTU/HR GREEN SAWDUST-FIRED GASIFIER, ADD AN ESP TO AN EXISTING BOILER FOR BOILER MACT COMPLIANCE AND REBUILD OR REPLACE THE MULTICLONES ON THE BOILER, INCREASE PRODUCTION THROUGH THE PLANER MILL AND SAWMILL, AND REPERMIT THE LAST CONTINUOUS LUMBER

DRYING KILN (KLN5) INSTALLED IN 2013 FOR A PRODUCTION INCREASE. (KLN6 IS IDENTICAL TO KLN5). NEW SOUTH'S TOTAL DRYING CAPACITY WILL INCREASE TO 235.7 MILLION BD-FT/YR AS A

RESULT OF THIS PROJECT.

D: Both B (Add new process to existing facility) &C (Modify process at existing 321113 **NAICS Code:** Permit Type:

facility)

HTTP: Permit URL:

Corporate/Company Name:

4 USA **EPA Region:** COUNTRY:

DARLINGTON **Facility County:** 

SC **Facility State:** 29532 **Facility ZIP Code:** 

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

KATHARINE BUCKNER Other Agency Contact Info:

BUCKNEKK@DHEC.SC.GOV

803-898-4123

RBLC Sysop Note: No Permit Date was supplied and system MUST have this to create entry. The Permit Date entered is the only other **Permit Notes:** 

> entered date, the Compliance Application Date. Contact SC Agency for the correct information. NEW SOUTH - DARLINGTON SUBMITTED AN APPLICATION TO INSTALL A NEW 85 MILLION BD-FT/YR DIRECT-FIRED, CONTINUOUS LUMBER DRYING KILN (KLN6) WITH A 35 MILLION BTU/HR GREEN SAWDUST-FIRED GASIFIER, ADD AN ESP TO AN EXISTING BOILER FOR BOILER MACT COMPLIANCE AND REBUILD OR REPLACE THE MULTICLONES ON THE BOILER, INCREASE PRODUCTION THROUGH THE PLANER MILL AND SAWMILL, AND REPERMIT THE LAST CONTINUOUS

LUMBER DRYING KILN (KLN5) INSTALLED IN 2013 FOR A PRODUCTION INCREASE. (KLN6 IS IDENTICAL TO KLN5). NEW SOUTH'S TOTAL DRYING CAPACITY WILL INCREASE TO 235.7 MILLION BD-FT/YR AS A RESULT OF THIS

PROJECT.

# Process/Pollutant Information

PROCESS TWO KILNS - KLN5 AND KLN6

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** GREEN SAWDUST

Throughput: 85.00 MILLION BD-FT/YR

TWO - 85.0 MILLION BD-FT/YR DUAL TRACK, DIRECT-FIRED, CONTINUOUS LUMBER DRYING KILN WITH 35 MILLION BTU/HR **Process Notes:** 

GREEN SAWDUST-FIRED GASIFIER BURNER

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

(P) PROPER OPERATION AND MAINTENANCE **Control Method:** 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton**Compliance Verified:** Unknown

Pollutant/Compliance Notes: THERE IS NO EMISSION LIMIT. BACT HAS BEEN DETERMINED TO BE WORK PRACTICE

0820-0045-CK

2421

01/26/2016 (actual)

Permit Number:

SIC Code:

7/16/2020

STANDARDS. VOC EMISSIONS ARE BASED ON AN EMISSION FACTOR OF 5.824 LB/THOUSAND BD-FT (AS TERPENE METHANOL FORMALDEHYDE BASIS).

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**Facility Information** 

AR-0127 (final) **RBLC ID: Date Determination** 

BRETT BRAY 4794895223 BRETT BRAY@DELTIC.COM

08/15/2016 Last Updated:

110020056776

DELTIC TIMBER CORPORATION 0592-AOP-R10 Permit Number: Corporate/Company Name: DELTIC TIMBER CORPORATION - OLA Permit Date: 10/13/2015 (actual) **Facility Name:** 

**Facility Contact:** FRS Number: SAWMILL AND LUMBER KILN 2421 **Facility Description:** SIC Code:

321113 D: Both B (Add new process to existing facility) &C (Modify process at existing **NAICS Code:** Permit Type:

HTTPS:WWW.ADEQ.STATE.AR.US/DOWNLOADS/WEBDATABASES/PERMITSONLINE/AIR/0592-Permit URL:

AOP-R10.PDF

COUNTRY: USA **EPA Region:** 

YELL **Facility County:** AR **Facility State:** 72853 **Facility ZIP Code:** 

ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name) Permit Issued By:

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

**Permit Notes:** 

Class 1 Area State: **Affected Boundaries: Boundary Type: Boundary:** Distance: CLASS1 < 100 km AL. Sipsey

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

152.9000 (Tons/Year) Carbon Monoxide Nitrogen Oxides (NOx) 61.9000 (Tons/Year) Particulate Matter (PM) 69.2000 (Tons/Year) Sulfur Oxides (SOx) 9.7000 (Tons/Year) Volatile Organic Compounds (VOC) 435.3000 (Tons/Year)

Process/Pollutant Information

**PROCESS** STEAM HEATED CONTINUOUS KILN NO. 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 79000.00 MBF/YR

**Process Notes:** MAXIMUM SHORT-TERM CAPACITY = 9.5 MBF/HR

> POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

33.3000 LB/H AVERAGED OVER DRYING CYCLE TIME **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements:

**Control Method:** (P) PROPER DRYING SCHEDULE AND A TEMPERATURE BASED ON MOISTURE CONTENT OF THE

LUMBER TO BE DRIED AND THE MANUFACTURER'S SPECIFICATIONS

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

AN EMISSION FACTOR OF 3.5 LB/MBF WAS USED TO DETERMINE THE BACT LIMIT **Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS STEAM HEATED CONTINUOUS KILN NO. 4

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 79000.00 MBF/YR

**Process Notes:** MAXIMUM SHORT-TERM CAPACITY = 9.5 MBF/HR

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 33.3000 LB/H AVERAGED OVER DRYING CYCLE TIME

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) PROPER DRYING SCHEDULE AND A TEMPERATURE BASED ON MOISTURE CONTENT OF THE

LUMBER TO BE DRIED AND THE MANUFACTURER'S SPECIFICATIONS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: AN EMISSION FACTOR OF 3.5 LB/MBF WAS USED TO DETERMINE THE BACT LIMIT

## Process/Pollutant Information

**PROCESS** DIRECT-FIRED CONTINUOUS KILN NO. 5

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 79000.00 MBF/YR

**Process Notes:** MAXIMUM SHORT-TERM CAPACITY = 10.9 MBF/HR

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 38.2000 LB/H AVERAGED OVER DRYING CYCLE TIME

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) PROPER DRYING SCHEDULE AND A TEMPERATURE BASED ON MOISTURE CONTENT OF THE

LUMBER TO BE DRIED AND THE MANUFACTURER'S SPECIFICATIONS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

Pollutant/Compliance Notes: AN EMISSION FACTOR OF 3.5 LB/MBF WAS USED TO DETERMINE THE BACT LIMIT

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Facility Information

RBLC ID: AL-0322 (final) **Date Determination** 

Last Updated:

05/11/2018

WESTROCK COATED BOARD, LLC Corporate/Company Name:

**Permit Number:** 

211-S005-X007 08/05/2015 (actual)

**Facility Name:** 

COTTONTON SAWMILL

**Permit Date:** 

**Facility Contact: Facility Description:**  BEN SELLERS 334-855-5564 BENJAMIN.SELLERS@WESTROCK.COM

FRS Number: SIC Code:

110010380097

Permit Type:

Softwood Lumber Sawmill with Dry kilns and planer mill D: Both B (Add new process to existing facility) &C (Modify process at existing

2421

facility)

**NAICS Code:** 

321113

Permit URL:

4 **EPA Region:** 

**COUNTRY:** 

USA

**Facility County: Facility State:** 

ΑL 36851

RUSSELL

**Facility ZIP Code:** Permit Issued By:

ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Other Agency Contact Info:

Rachael Broadway 1400 Coliseum Blvd.

Montgomery, AL 36110-2400

**Permit Notes:** 

**Facility-wide Emissions:** 

**Pollutant Name:** 

**Facility-wide Emissions Increase:** 

Nitrogen Oxides (NOx) Particulate Matter (PM) Sulfur Oxides (SOx) Volatile Organic Compounds (VOC)

6.6700 (Tons/Year) 6.9500 (Tons/Year) 1.3600 (Tons/Year) 65.3200 (Tons/Year)

## Process/Pollutant Information

PROCESS

Continuous Direct-fired Lumber Dry Kiln with 34 MMBtu/hr Wood-fired burner

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Biomass Throughput: 16.40 MBF/hr

**Process Notes:** Modification of existing batch-style kiln to continuous lumber dry kiln by addition of conditioning chambers and modifying circulation of air flow

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Other WPP1 Other Test Method:

Pollutant Group(s): (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 4.2100 LB/MBF VOC AS TERPENES, M25A

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**BACT-PSD** Case-by-Case Basis: Other Applicable Requirements: N/A

**Control Method:** (P) Good combustion practices and proper maintenance

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

06/17/2016 AR-0124 (final) **Date Determination** RBLC ID:

7/16/2020

Last Updated:

Corporate/Company Name:UNION COUNTY LUMBER COMPANYPermit Number:2348-AOP-R0Facility Name:EL DORADO SAWMILLPermit Date:08/03/2015 (actual)Facility Contact:ROBERT HANRY 8703159397 RHANRY@COMACT.COMFRS Number:110006786497

Facility Description:SAWMILL AFIN: 70-00032 AFIN: 70-00032SIC Code:2421Permit Type:A: New/Greenfield FacilityNAICS Code:321113

Permit URL: HTTPS://WWW.ADEQ.STATE.AR.US/DOWNLOADS/WEBDATABASES/PERMITSONLINE/AIR/2348-

AOP-R0.PDF

EPA Region: 6 COUNTRY: USA

Facility County: UNION
Facility State: AR
Facility ZIP Code: 71730

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Other Agency Contact Info: TOM RHEAUME 501-682-0762

Permit Notes: AFIN: 70-00032

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 AL Sipsey 100km - 50km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Particulate Matter (PM) 56.3000 (Tons/Year) Volatile Organic Compounds (VOC) 599.3000 (Tons/Year)

## Process/Pollutant Information

PROCESS LUMBER DRYING KILN SN-01

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: NATURAL GAS
Throughput: 45.00 MMBTU/H

Process Notes: SN-02 DIRECT-FIRED, MAX 18.5 MBF/HR, LOW NOX BURNERS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 3.8000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\ensuremath{\mathsf{NESHAP}}$  ,  $\ensuremath{\mathsf{OPERATING}}$  PERMIT

Control Method: (N) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0220 LB/MBF **Emission Limit 2:** 7.6000 LB/MMSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) PROPER MAINTENANCE AND OPERATION AND NATURAL GAS (CLEAN FUEL)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS LUMBER DRYING KILN SN-02

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** NATURAL GAS **Throughput:** 45.00 MMBTU/H

**Process Notes:** SN-02, DIRECT-FIRED, MAX 18.5 MBF/HR, LOW-NOX BURNERS

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.8000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0220 LB/MBF
Emission Limit 2: 7.6000 LB/MMSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) PROPER MAINTENANCE AND OPERATION AND NATURAL GAS (CLEAN FUEL)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS LUMBER DRYING KILN SN-03

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** NATURAL GAS **Throughput:** 45.00 MMBTU/H

Process Notes: SN-03, DIRECT-FIRED, MAX 18.5 MBF/HR, LOW-NOX BURNERS

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.8000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

 Emission Limit 1:
 0.0220 LB/MBF

 Emission Limit 2:
 7.6000 LB/MMSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) PROPER MAINTENANCE AND OPERATION AND NATURAL GAS (CLEAN FUEL)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** ELEVEN OIL STORAGE TANKS SN-14

NAME:

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

Primary Fuel: Throughput: 0

Process Notes: SN-14, VARIOUS SIZES

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.3000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) ENCLOSED TANKS, TANKS ARE LIGHT COLOR

Est. % Efficiency:

Pollutant/Compliance Notes:

PROCESS THREE DIESEL STORAGE TANKS SN-15

NAME:

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

Primary Fuel: Throughput:

Process Notes: SN-15, THREE, VARIOUS SIZES

0

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.4000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) TANKS ARE LIGHT COLOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** ONE GASOLINE STORAGE TANK SN-16

NAME:

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

Primary Fuel:

Throughput: 0

Process Notes: SN-16, 5,890 GALLONS, ONE TANK

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0220 LB/MBF **Emission Limit 2:** 7.6000 LB/MMSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) TANKS ARE LIGHT COLOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes:

## Process/Pollutant Information

PROCESS DEBARKER SN-04

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:
Throughput:

**Process Notes:** DEBARKER WITH HOOD ENCLOSURE

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0200 LB/T

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (A) HOOD ENCLOSURE - EFFICIENCY FROM NC-DENR

Est. % Efficiency: 95.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS SAWMILL SN-05

NAME:

**Process Type:** 30.007 (Woodworking)

Primary Fuel: Throughput:

Process Notes: SAWMILL LOCATED INSIDE A BUILDING

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3500 LB/T

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (A) SAWMILL LOCATED INSIDE BUILDING

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS PLANER MILL SN-06

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel: Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0040 GR/SCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) CYCLONE + BAGHOUSE AIR FLOW RATES AND OUTLET GRAIN LOADING BASED ON

VENDOR TESTING - PROPER MAINTENANCE AND OPERATION

Est. % Efficiency: 99.990
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Yes

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS

YATES HOG MILL SN-07

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:
Throughput: 0
Process Notes:

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0010 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) CYCLONE - AIR FLOW RATE AND OUTLET GRAIN LOADING, BASED ON STACK TEST -

PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Yes

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS TRUCK BIN SN-08

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel: Throughput:

**Process Notes:** 

POLLUTANT NAME: Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0020 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) CYCLONE - PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

#### **Pollutant/Compliance Notes:**

## Process/Pollutant Information

PROCESS HAUL ROADS SN-09

NAME:

**Process Type:** 99.150 (Unpaved Roads)

Primary Fuel:
Throughput:
Process Notes:

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 12.7000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) ROAD WATERING PLAN + 0% OFF-SITE OPACITY

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** MATERIAL PROCESSING SN-11

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:
Throughput: 0
Process Notes:

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0200 LB/T

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,{
m N}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** STORAGE PILES FOR BARK, SAWDUST, WOOD CHIPS SN-12

NAME:

Process Type: 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0200 LB/T

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT Control Method: (P) WATERING PILES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS PLANER MILL WOODWASTE STORAGE BIN SN-13

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel: Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0011 LB/T

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT
Control Method: (P) STORAGE BIN BARRIER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

## Previous Page

## **Facility Information**

RBLC ID: AL-0304 (final) Date Determination

Last Updated: 06/28/2017
Corporate/Company Name: RESOLUTE FP U.S., INC. Permit Number: 309-0072-X

Corporate/Company Name:RESOLUTE FP U.S., INC.Permit Number:309-0072-X001Facility Name:RESOLUTE FOREST PRODUCTS - ALABAMA SAWMILLPermit Date:06/24/2015 (actual)

Facility Contact: DAVID STEWART 256-861-8880 FRS Number: 110056955166

Facility Description:Lumber MillSIC Code:2421Permit Type:B: Add new process to existing facilityNAICS Code:322121

Permit URL:

**EPA Region:** 4 COUNTRY: USA

**TALLADEGA Facility County:** 

AL **Facility State:** 35044 Facility ZIP Code:

ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name) Permit Issued By:

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

NAICS Code: 32113 **Permit Notes:** 

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

Carbon Monoxide 121.0000 (Tons/Year) Nitrogen Oxides (NOx) 46.0000 (Tons/Year) Particulate Matter (PM) 46.0000 (Tons/Year) Sulfur Oxides (SOx) 11.0000 (Tons/Year) Volatile Organic Compounds (VOC) 626.0000 (Tons/Year)

## Process/Pollutant Information

**PROCESS** Sawmill operations including chipper, debarker and kiln fuel silos.

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

**Primary Fuel:** 

Throughput: 325.00 mmbf/yr Kiln fuel silos **Process Notes:** 

> POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC

Test Method: EPA/OAR Mthd 25

Pollutant Group(s): (Volatile Organic Compounds (VOC))

0.3100 LB/TON GREEN FUEL ROLLING 12 MONTHS **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** 

**Pollutant/Compliance Notes:** Even with the, No Control Method, there was proper maintenance and operating procedure.

Previous Page

**Facility Information** 

**RBLC ID:** AL-0305 (final) **Date Determination** 

Last Updated:

09/28/2017

RESOLUTE FP U.S., INC. 309-0072-X002 Corporate/Company Name: Permit Number: RESOLUTE FOREST PRODUCTS - ALABAMA SAWMILL 06/24/2015 (actual) Permit Date: **Facility Name:** 

DAVID STEWART 256-861-8880 Not Found **Facility Contact:** FRS Number:

Lumber Mill 2421 **Facility Description:** SIC Code: B: Add new process to existing facility 321113 **Permit Type: NAICS Code:** 

Permit URL:

USA **EPA Region:** COUNTRY:

**TALLADEGA Facility County:** 

AL **Facility State:** 35044 **Facility ZIP Code:** 

7/16/2020 Format RBLC Report

ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name) Permit Issued By:

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Other Agency Contact Info:

NAICS Code: 321113

**Permit Notes:** 

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** INTL BORDER US/Canada Border < 100 km

**Facility-wide Emissions Increase: Pollutant Name:** 

**Facility-wide Emissions:** 

Carbon Monoxide 121.0000 (Tons/Year) Nitrogen Oxides (NOx) 46.0000 (Tons/Year) Particulate Matter (PM) 46.0000 (Tons/Year) Sulfur Oxides (SOx) 11.0000 (Tons/Year) Volatile Organic Compounds (VOC) 626.0000 (Tons/Year)

Process/Pollutant Information

PROCESS Continuous Direct-Fired Lumber Dry Kilns with 35 mmbtu/hr Wood Fired Burner

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** Wood

Throughput: 108.33 mmbf/yr - each

**Process Notes:** 

POLLUTANT NAME: Carbon Monoxide

630-08-0 **CAS Number:** 

EPA/OAR Mthd 10 **Test Method: Pollutant Group(s):** (InOrganic Compounds)

0.7300 LB/MBF ROLLING 12 MONTHS **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** 

**Pollutant/Compliance Notes:** Eventhough the method is No Control, proper maintenance and operating procedures.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** EPA/OAR Mthd 25

Pollutant Group(s): (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 3.7600 LB/MBF ROLLING 12 MONTHS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** 

**Pollutant/Compliance Notes:** Emissions Limits: 3.76 lb/mbf as Terpene and Methanol and Formaldehyde rolling 12 months.

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## **Facility Information**

RBLC ID: AR-0120 (final) Date Determination

Last Updated:

07/29/2016 0592-AOP-R10

Corporate/Company Name: DELT

DELTIC TIMBER CORPORATION

Permit Number:

02/11/2015 (actual)

Facility Name:

Facility Contact:

J

JIM PHILLIPS 870-881-6425 JIM PHILLIPS@DELTIC.COM

Permit Date: FRS Number:

SIC Code:

110056342569

**Facility Description:** 

The facility located in Ola, AR is a southern yellow pine sawmill with one direct-

fired, continuous kiln and two indirect(steam heated), continuous kilns. A 60.0

MMBtu/hr bio-gas boiler provides steam to the kilns. The facility is permitted to produce a maximum 165 MMBF/yr of dried lumber.

,

2421

Permit Type:

D: Both B (Add new process to existing facility) &C (Modify process at existing

NAICS Code:

COUNTRY:

321113

USA

Permit URL:

**Facility County:** 

**EPA Region:** 6

YELL

facility)

Facility State: AR
Facility ZIP Code: 72853

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Permit Notes: The permit authorized construction of one direct-fired continuous kiln and modification of two existing indirect-fired kilns from batch to

continuous. Permitted maximum kiln dried lumber production remained at 165 MMBF/yr. The project was determined to be a major

modification due to VOC increasing by more than 40 tpy.

**Affected Boundaries:** 

Class 1 Area State: **Boundary Type:** Distance: Boundary: CLASS1 AR Caney Creek 100km - 50km CLASS1 MO Hercules-Glades 100km - 50km CLASS1 AR Upper Buffalo < 100 km**Facility-wide Emissions Increase:** 

**Facility-wide Emissions:** 

Pollutant Name: Facility-wide Emissions
Carbon Monoxide 43.0800 (Tons/Year)

| Volatile Organic Compounds (VOC) | Volume | Vo

### Process/Pollutant Information

PROCESS Dry Kiln No. 3 (SN-06)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: None

**Throughput:** 105.00 MMBF/yr

Process Notes: Throughput is the

Notes: Throughput is the total lumber processed by both indirect-fired, continuous kilns (SN-06 and SN-12) in any consecutive 12 month period. The units

for throughput are millions of board feet per year.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 33.3000 LB/H AVERAGE OF THREE 1-HR TEST RUNS

**Emission Limit 2:** 

Standard Emission: 3.5000 LB/1,000 BF AVERAGE OF THREE 1-HR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

 $\label{eq:control} \begin{tabular}{ll} \textbf{Other Applicable Requirements:} \\ \textbf{Control Method:} \end{tabular} \begin{tabular}{ll} (N) \end{tabular}$ 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

7/16/2020

**PROCESS** Drying Kiln No. 4 (SN-12)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: None

**Throughput:** 105.00 MMBF/yr

Process Notes: Throughput is the total lumber processed by both indirect-fired, continuous kilns (SN-06 and SN-12) in any consecutive 12 month period. The units

for throughput are millions of board feet per year.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 33.2000 LB/H AVERAGE OF THREE 1-HR TEST RUNS

**Emission Limit 2:** 

Standard Emission: 3.5000 LB/1,000 BF AVERAGE OF THREE 1-HR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 No

Pollutant/Compliance Notes:

### Process/Pollutant Information

PROCESS Drying Kiln No. 5 (SN-21)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** wood residue **Throughput:** 60.00 MMBF/yr

Process Notes: Throughput is for lumber processed by the direct-fired, batch kiln (SN-21) in any consecutive 12 month period. The units for throughput are millions

of board feet per year.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 23.5000 LB/H AVERAGE OF THREE 1-HR TEST RUNS

**Emission Limit 2:** 

Standard Emission: 3.5000 LB/1,000 BF AVERAGE OF THREE 1-HR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 No

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: AR-0122 (final) Date Determination

Last Updated: 08/15/2016

7/16/2020 Format RBLC Report

GEORGIA-PACIFIC WOOD PRODUCTS SOUTH LLC (GURDON PL 463-AOP-R8 Corporate/Company Name: **Permit Number:** 02/06/2015 (actual)

GEORGIA-PACIFIC WOOD PRODUCTS SOUTH LLC (GURDON PLYWOOD **Facility Name:** Permit Date:

AND

BRIAN HICKS 8703535323 110017425071 **Facility Contact:** FRS Number:

2421 SIC Code: **Facility Description:** 

B: Add new process to existing facility 321113 **Permit Type: NAICS Code:** 

Permit URL:

USA 6 **EPA Region:** COUNTRY:

**CLARK Facility County:** AR **Facility State: Facility ZIP Code:** 71743

ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name) Permit Issued By:

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Permit Notes:

### Process/Pollutant Information

SN-09 #4 LUMBER KILN **PROCESS** 

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** NATURAL GAS

130.00 MILLION BOARD FEET Throughput:

**Process Notes:** DIRECT FIRED

> **POLLUTANT NAME:** Volatile Organic Compounds (VOC)

VOC **CAS Number:** Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC) **Emission Limit 1:** 3.8000 LB/ 1000 BOARD FEET

373.7000 T/YR **Emission Limit 2: Standard Emission:** 92.0000

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD** Case-by-Case Basis:

Other Applicable Requirements: **Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

Pollutant/Compliance Notes:

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## **Facility Information**

SC-0163 (final) RBLC ID: **Date Determination** 

Last Updated: KAPSTONE CHARLESTON KRAFT LLC

Corporate/Company Name: KAPSTONE CHARLESTON KRAFT LLC- SUMMERVILLE **Facility Name:** 

AMY ARTMEIER 8437453250 AMY.ARTMEIER@KAPSTONEPAPER.COM **Facility Contact:** 

LUMBER MILL THAT PURCHASES HARVESTED TIMBER WHICH IS **Facility Description:** 

PROCESSED INTO LUMBER AND PULPWOOD CHIPS.

321999 A: New/Greenfield Facility **NAICS Code: Permit Type:** 

Permit URL:

4 USA **COUNTRY: EPA Region:** 

DORCHESTER **Facility County:** 

07/06/2016

**Permit Number:** 

**Permit Date:** 

FRS Number:

SIC Code:

0900-0017-CE

110041047033

2421

01/20/2015 (actual)

7/16/2020

SC**Facility State:** Facility ZIP Code: 29483

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info:

OMARI THOMPSON (803) 898-4123

**Permit Notes:** 

## Process/Pollutant Information

**PROCESS** LUMBER KILNS

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 194.83 MMBF/YR

Process Notes: INSTALLATION OF A NEW DIRECT-FIRED LUMBER DRYING KILN ALONG WITH ANCILLARY EQUIPMENT. THIS PROJECT WILL

ALSO INCREASE THE DRYING CAPACITY FOR THE FACILITY FROM 118.448 MMBD-FT/YR TO 194.825 MMBD-FT/YR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC)

**Emission Limit 1:** 225.6000 T/YR 3.7600 LB/MBF **Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements:

**Control Method:** (P) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton Unknown **Compliance Verified:** 

**Pollutant/Compliance Notes:** 

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Facility Information

AL-0273 (final) RBLC ID: **Date Determination** 

Last Updated: 05/05/2016 WEYER HAEUSER NR COMPANY 408-5003-X022 Corporate/Company Name: **Permit Number:** MILLPORT WOOD PRODUCTS FACILITY **Facility Name: Permit Date:** 12/30/2014 (actual) 110000589257 FRS Number:

CHRISTOPHER HOPF 205-596-**Facility Contact:** 

1197 CHRISTOPHER.HOPF@WEYERHAEUSER.COM

Manufactures finished, dimensional southern yellow pine lumber from logs. 2421 SIC Code: **Facility Description:** B: Add new process to existing facility 321113 Permit Type: **NAICS Code:** 

Permit URL:

4 USA **EPA Region: COUNTRY:** 

LAMAR **Facility County: Facility State:** AL35576-2534 **Facility ZIP Code:** 

ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name) Permit Issued By:

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

NAICS Code: 321113 Permit Notes:

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

-122.4000 (Tons/Year) Carbon Monoxide -22.3000 (Tons/Year) Nitrogen Oxides (NOx) Particulate Matter (PM) 6.9000 (Tons/Year)

7/16/2020 Format RBLC Report

Sulfur Oxides (SOx) -3.3000 (Tons/Year)
Volatile Organic Compounds (VOC) 105.0000 (Tons/Year)

Process/Pollutant Information

PROCESS Continuous direct-lumber dry kiln

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Green sawdust **Throughput:** 140000.00 mbf/yr

Process Notes: 140,000mbf/yr Continuous Direct-fired lumber dry kiln (CDR-4) with 35 mmbtu/hr Wood-fired burner.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.7000 LB MBF AS WPP 1\*

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Control Method: (B) Proper maintenance & operating practice requirements. Test method information: Method 18/25.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \* (VOC as propane, determined as VOC as C x 1.225 + ((1-0.65) x Methane) + Formaldehye)

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**Facility Information** 

RBLC ID: SC-0165 (final) Date Determination

**Last Updated:** 07/06/2016

Corporate/Company Name: NEW SOUTH COMPANIES, INC. Permit Number: 1340-0029-CH-R2

Facility Name: NEW SOUTH COMPANIES, INC. - CONWAY PLANT Permit Date: 10/15/2014 (actual)

Facility Name:NEW SOUTH COMPANIES, INC. - CONWAY PLANTPermit Date:10/15/2014 (actual)Facility Contact:TIM PAPA 8433493463 TIM.PAPA@NEWSOUTH.CANFOR.COMFRS Number:110000740789

Facility Description: LUMBER MILL THAT PRODUCES STRUCTURAL LUMBER FROM PINE SIC Code: 2421

Facility Description: LOMBER MILL THAT PRODUCES STRUCTURAL LOMBER FROM PINE SIC Code:

C.M

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: HORRY
Facility State: SC
Facility ZIP Code: 29526

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info: OMARI THOMPSON (803) 898-4123

**Permit Notes:** 

Process/Pollutant Information

PROCESS LUMBER KILNS

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

Throughput: 295.60 MMBF/YR

Process Notes: FACILITY IS CONVERTING PREVIOUSLY PERMITTED STEAM HEATED CONTINUOUS KILN TO A DIRECT-FIRED UNIT. THIS

MODIFICATION WILL PUT THE DRYING CAPACITY FOR THE FACILITY AT 295.6 MILLION BD-FT/YR.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 602.0000 T/YR (442 T/YR KILNS 1-5, 160 T/YR KILN 6)

Emission Limit 2: 4.2000 LB/MBF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

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## **Facility Information**

RBLC ID:	FL-0343 (final)	Date Determination	
		Last Updated:	05/05/2016
Corporate/Company Name:	WEST FRASER, INC	Permit Number:	0310197-012-AC
Facility Name:	WHITEHOUSE LUMBER MILL	Permit Date:	09/09/2014 (actual)
Facility Contact:	JULIAN ROBERTS JULIAN.ROBERTS@WESTFRASER.COM	FRS Number:	110002524563

Facility Description: Lumber mill, processes southern pine logs into chips, bark, and graded lumber.

Includes log yard, sawmill, lumber kilns and boilers, planer mill. Kilns heated

primarily with wood waste (propane as supplemental fuel).

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL: http://arm-permit2k.dep.state.fl.us/nontv/0310197.012.AC.F.ZIP

EPA Region: 4 COUNTRY: USA

Facility County: DUVAL
Facility State: FL
Facility ZIP Code: 32220

Permit Issued By: FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION (Agency Name)

MR. DAVID READ(Agency Contact) (850) 717-9000 David.Read@dep.state.fl.us

Permit Notes: Technical evaluation at http://arm-permit2k.dep.state.fl.us/nontv/0310197.012.AC.D.ZIP Permit entails removing existing batch lumber drying kilns with burners, and replacing with two continuous dual path kilns. Each new kiln has capacity of 15 thousand board ft/hr. New

kilns fired with wood shavings (supplemented with propane). Total production capacity increases from 110 to 170 million board ft/yr.

SIC Code:

2421

**Boundary Type:** Class 1 Area State: **Boundary:** Distance: **Affected Boundaries:** CLASS1 FLChassahowitzka 100km - 50km CLASS1 GA Okefenokee < 100 km 100km - 50km CLASS1 FL Saint Marks CLASS1 GA Wolf Island 100km - 50km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

 Carbon Monoxide
 62.0000 (Tons/Year)

 Nitrogen Oxides (NOx)
 24.0000 (Tons/Year)

 Particulate Matter (PM)
 22.0000 (Tons/Year)

 Sulfur Oxides (SOx)
 8.8000 (Tons/Year)

 Volatile Organic Compounds (VOC)
 319.0000 (Tons/Year)

## Process/Pollutant Information

PROCESS Direct-Fired Continuous Kilns

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** Wood waste Throughput: 40.00 MMBTU/H

**Process Notes:** 40 MMBTU/hr heat input per kiln, primarily dry shavings Production capacity 15 thousand board ft/hr per kiln Two kilns

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC **Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 3.7600 LB/THOUSAND BOARD FT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (P) Proper Maintenance and Operating Procedures: • Minimize over-drying the lumber. • Maintain consistent

> moisture content for the processing lumber charge. • Dry the lumber at the minimum temperature. • Develop a written Operation and Maintenance (O&M) plan identifying the above practices and the operation and maintenance requirements from the kiln manufacturer. • Record and monitor the total monthly amount and 12month annual total of wood dried in each kiln (board-feet). • Record the calculated monthly and 12-month annual

total emissions of VOC to demonstrate compliance with the process and emissions limits.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes: 3.76 lb VOC per thousand board feet limit Based on emissions factors, records, and proper maintenance and

operation

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Information

SC-0164 (final) **RBLC ID: Date Determination** 

07/06/2016 Last Updated: SIMPSON LUMBER COMPANY, LLC 1140-0008-CH **Permit Number:** Corporate/Company Name: SIMPSON LUMBER COMPANY, LLC 06/20/2014 (actual) **Facility Name: Permit Date:** 

SHIRLEY COLLENTON 8435207229 SCOLLEN@SIMPSON.COM 110040922712 **Facility Contact:** FRS Number:

SIMPSON LUMBER OPERATES A LUMBER MILL OUTSIDE OF 2421 **Facility Description:** SIC Code:

GEORGETOWN, SC AND PRODUCES FINISHED LUMBER OUT OF LOGGED SOUTHERN YELLOW PINE. THE FOLLOWING OPERATIONS TAKE PLACE AT THE FACILITY: SAWMILL OPERATIONS, STEAM GENERATION, LUMBER DRYING AND PLANER MILL OPERATIONS.

D: Both B (Add new process to existing facility) &C (Modify process at existing

321113 **Permit Type: NAICS Code:** 

facility)

**EPA Region:** 

COUNTRY: USA

GEORGETOWN **Facility County:** 

SC **Facility State:** 29440 **Facility ZIP Code:** 

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

OMARI THOMPSON (803) 898-4123 Other Agency Contact Info:

**Permit Notes:** 

Permit URL:

# Process/Pollutant Information

**PROCESS** LUMBER KILNS

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** 

**Throughput:** 166.00 MMBF/YR

Process Notes: FACILITY IS GOING TO CONSTRUCT NEW DUAL PATH DIRECT-FIRED LUMBER KILN. FACILITY IS ALSO GOING TO CONVERT

PREVIOUSLY PERMITTED STEAM HEATED CONTINOUS KILN TO A DIRECT-FIRED UNIT. THIS MODIFICATION WILL PUT THE

DRYING CAPACITY FOR THE FACILITY AT 166 MMBD-FT/YR.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 156.0000 T/YR **Emission Limit 2:** 3.7600 LB/MBF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) PROPER OPERATION AND MAINTENANCE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

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**Facility Name:** 

**Facility Information** 

RBLC ID: SC-0169 (final) Date Determination

**Last Updated:** 11/02/2017

Corporate/Company Name: NEW SOUTH LUMBER COMPANY, INC. Permit Number: 1380-0025-CJ

CAMDEN PLANT Permit Date: 06/18/2014 (actual)

Facility Contact: SYSNULL FRS Number: Not Found

Facility Description: SIC Code: 2421

Permit Type: B: Add new process to existing facility NAICS Code: 321113

Permit URL: HTTP:

EPA Region: 4 COUNTRY: USA

Facility County: KERSHAW

Facility State: SC Facility ZIP Code: 29030

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

**Permit Notes:** 

Process/Pollutant Information

PROCESS DKN6 - DIRECT FIRED CONTINUOUS LUMBER DRYING KILN

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: WOOD

**Throughput:** 80.00 MMBD-FT/YR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 150.4000 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis:BACT-PSDOther Applicable Requirements:MACTControl Method:(N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: PROPER OPERATION AND MAINTENANCE TONS/YEAR LIMIT BASED ON AN EMISSION FACTOR

OF 3.76 LB VOC/1000 BOARD FEET (AS TERPENE METHANOL FORMALDEHYDE)

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**Facility Information** 

RBLC ID: SC-0180 (final) Date Determination

**Last Updated:** 10/04/2018

SIC Code:

2421

Corporate/Company Name:ELLIOTT SAWMILLING COMPANY, INC.Permit Number:1280-0004-CLFacility Name:ELLIOTT SAWMILLING COMPANY, INC.Permit Date:06/10/2014 (actual)Facility Contact:ROBERT ELLIOTT 803-625-3331 ROBERTE@ESAW.BIZFRS Number:110020016061

**Facility Description:** Elliott Sawmilling is a lumber sawmill that produces dimensional lumber from logs.

The facility is divided into four process areas: log yard, sawmill, lumber kilns, and

The facility is divided into four process areas: log yard, sawmill, lumber kilns, and planer mill. There are two separate lumber lines - one for logs and one for pulp wood. As of 2014, Elliott operated 5 batch lumber kilns, all wood waste fired.

Permit Type: B: Add new process to existing facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: HAMPTON

Facility State: SC Facility ZIP Code: 29918

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

**Permit Notes:** 

## Process/Pollutant Information

PROCESS Batch Drying Lumber Kiln No. 5

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: wood

**Throughput:** 53.00 MM BF/YR

**Process Notes:** Kiln No. 5 is rated at 34 million Btu/hr direct fired with sawdust.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

 $Pollutant \ Group(s): \qquad \qquad (\ Particulate \ Matter \ (PM)\ )$ 

**Emission Limit 1:** 25.4100 LB/T

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: N/A
Other Applicable Requirements: SIP
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 3.7600 LB/M BF TERPENE + METHANOL + FORMALDEHYDE

**Emission Limit 2:** 99.6400 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: FL-0340 (final) Date Determination

**Last Updated:** 01/06/2015

Corporate/Company Name:GILMAN BUILDING PRODUCTSPermit Number:1230033-012-ACFacility Name:PERRY MILLPermit Date:04/01/2014 (actual)

Facility Contact: CULLEN ADAIR CULLENADAIR@GILLMAN.COM FRS Number: 110041048522

Facility Description: Processes southern pine logs into chips, bark, and lumber. Includes two direct-fired SIC Code: 242

drying kilns. Total capacity is 150 MBF/yr. This includes the capacity of the new

unit, which is 90 MBF/yr.

Permit Type: D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 321113

facility)

Permit URL: http://arm-permit2k.dep.state.fl.us/nontv/1230033.012.AC.F.ZIP

EPA Region: 4 COUNTRY: USA

Facility County: TAYLOR
Facility State: FL
Facility ZIP Code: 32348

Permit Issued By: FLORIDA DEPT. OF ENVIRONMENTAL PROTECTION (Agency Name)

MR. DAVID READ(Agency Contact) (850) 717-9000 David.Read@dep.state.fl.us

Permit Notes: Permit entails adding one new direct-fired lumber drying kiln and retiring two old indirect-fired drying kilns.

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 FL Chassahowitzka 100km - 50km CLASS1 GA Okefenokee 100km - 50km CLASS1 FL Saint Marks < 100 km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide -20.1000 (Tons/Year)
Nitrogen Oxides (NOx) -13.1000 (Tons/Year)
Particulate Matter (PM) -14.9000 (Tons/Year)
Sulfur Oxides (SOx) 4.4000 (Tons/Year)
Volatile Organic Compounds (VOC) 60.8000 (Tons/Year)

Process/Pollutant Information

PROCESS Direct-fired lumber drying kiln

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Waste wood

**Throughput:** 90.00 million board ft/yr

**Process Notes:** Drying capacity of new kiln is 90 million board feet of lumber per year.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.5000 LB/THOUSAND BOARD FT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) At a minimum, the permittee shall operate the kiln in accordance with the following best operating practices

(BMP). a. Minimize over-drying the lumber; b. Maintain consistent moisture content for the processing lumber charge; and c. Dry at the minimum temperature. The permittee shall develop and operate in accordance with a written plan to implement the above BMP and any others required by the kiln manufacturer. Ninety days before the initial startup of the kiln, the permitted shall submit to the Compliance Authority the BMP plan. The Title V

Last Updated:

09/19/2016

air operation permit shall include the submitted BMP plan.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC released from wood as it dries. No add-on controls, just best operating practices.

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## **Facility Information**

RBLC ID: LA-0293 (final) Date Determination

Corporate/Company Name: MARTCO LIMITED PARTNERSHIP Permit Number: PSD-LA-784

 Facility Name:
 CHOPIN MILL
 Permit Date:
 03/18/2014 (actual)

 Facility Contact:
 NATALIE MONROE (318) 448 FRS Number:
 110041907292

Facility Contact: NATALIE MONROE (318) 448-0405 NATALIE.MONROE@ROYOMARTIN.COM

Facility Description:Plywood manufacturing facilitySIC Code:2436Permit Type:B: Add new process to existing facilityNAICS Code:321212

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: NATCHITOCHES

Facility State: LA Facility ZIP Code: 71447

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Permit writer: Hassan Ghosn, (225) 219-3417 or hassan.ghosn@la.gov

Permit Notes: Complete application date = date of administrative completeness Project entails construction of two lumber dry kilns and a planar mill

baghouse. PSD review required for VOC only.

### Process/Pollutant Information

PROCESS Lumber Dry Kilns Nos. 1 & 2 (EQT 37 & 38)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 25000.00 M BD-FT/YR **Process Notes:** Throughput is per kiln.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:24.5100 LB/H HOURLY MAXIMUMEmission Limit 2:53.6800 T/YR ANNUAL MAXIMUM\*

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good operating practices to limit VOC emissions to 4.29 lb/M bd-ft (12-month rolling average).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \*Annual emissions from both kilns are limited to 53.68 TPY. Hourly emission limits are per kiln.

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# **Facility Information**

RBLC ID: LA-0281 (final) Date Determination

**Last Updated:** 09/14/2016

Corporate/Company Name: TIN INC. DBA TEMPLE-INLAND Permit Number: PSD-LA-770

Facility Name:SOUTHWEST LOUISIANA LUMBER OPERATIONSPermit Date:01/31/2014 (actual)Facility Contact:PAUL WILLIAMS 3377861300 PAULWILLIAMS@TEMPLEINLAND.COMFRS Number:110013836661

Facility Description: Sawmill SIC Code: 2421

Permit Type: C: Modify process at existing facility NAICS Code: 321113

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: BEAUREGARD

Facility State: LA Facility ZIP Code: 70633

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Mr. Christopher Smith, (225) 219-3439

**Permit Notes:** 

## Process/Pollutant Information

PROCESS EP-3K -Wood-Fired Dry Kiln No. 1

NAME:

**Process Type:** 

30.800 (Wood Lumber Kilns)

Primary Fuel: Wood

**Throughput:** 60000.00 MBF/YR

Process Notes: Annual throughput to 4 wood-fired dry kilns: EP-3K – Wood-Fired Dry Kiln No. 1; EP-4K – Wood-Fired Dry Kiln No. 2; EP-5K – Wood-Fired Dry Kil

Kiln No. 3; EQT009, & EP-6K - Wood-Fired Dry Kiln No. 4; shall be limited to no more than 240 MM BF/YR.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 29.2700 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.9600 LB/M BF WHEN DRYING LUMBER

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Proper kiln design & operation; annual production limit

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The maximum emission rates presented above are the average rates for each kiln over the drying cycle.

### Process/Pollutant Information

**PROCESS** EP-4K – Wood-Fired Dry Kiln No. 2

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Wood

**Throughput:** 60000.00 MBF/YR

Process Notes: Annual throughput to 4 wood-fired dry kilns: EP-3K – Wood-Fired Dry Kiln No. 1; EP-4K – Wood-Fired Dry Kiln No. 2; EP-5K – Wood-Fired Dry Kil

Kiln No. 3; EQT009, & EP-6K - Wood-Fired Dry Kiln No. 4; shall be limited to no more than 240 MM BF/YR.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 29.2700 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.9600 LB/M BF WHEN DRYING LUMBER

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Proper kiln design & operation; annual production limit

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The maximum emission rates presented above are the average rates for each kiln over the drying cycle.

# Process/Pollutant Information

**PROCESS** EP-5K – Wood-Fired Dry Kiln No. 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Wood

**Throughput:** 60000.00 MBF/YR

Process Notes: Annual throughput to 4 wood-fired dry kilns: EP-3K – Wood-Fired Dry Kiln No. 1; EP-4K – Wood-Fired Dry Kiln No. 2; EP-5K – Wood-Fired Dry Kil

 $Kiln\ No.\ 3; EQT009, \&\ EP-6K-Wood-Fired\ Dry\ Kiln\ No.\ 4; shall\ be\ limited\ to\ no\ more\ than\ 240\ MM\ BF/YR.$ 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:29.2700 LB/H HOURLY MAXIMUMEmission Limit 2:2.9600 LB/M BF WHEN DRYING LUMBER

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Proper kiln design & operation; annual production limit

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

Pollutant/Compliance Notes: The maximum emission rates presented above are the average rates for each kiln over the drying cycle.

## Process/Pollutant Information

**PROCESS** EP-6K – Wood-Fired Dry Kiln No. 4

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Wood

**Throughput:** 60000.00 MBF/YR

Process Notes: Annual throughput to 4 wood-fired dry kilns: EP-3K – Wood-Fired Dry Kiln No. 1; EP-4K – Wood-Fired Dry Kiln No. 2; EP-5K – Wood-Fired Dry

Kiln No. 3; EQT009, & EP-6K - Wood-Fired Dry Kiln No. 4; shall be limited to no more than 240 MM BF/YR.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 29.2700 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.9600 LB/M BF WHEN DRYING LUMBER

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Proper kiln design & operation; annual production limit

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The maximum emission rates presented above are the average rates for each kiln over the drying cycle.

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### **Facility Information**

RBLC ID: LA-0294 (final)

Corporate/Company Name: WEYERHAEUSER NR COMPANY

Facility Name: DODSON DIVISION

SHANE WELLS (318) 608-5903 SHANE.WELLS@WEYERHAEUSER.COM

Page Determination Last Updated: 12/20/2016

Permit Number: PSD-LA-627(M-3)

Permit Date: 12/30/2013 (actual)

FRS Number: 110006021125

Facility Contact:SHANE WELLS (318) 608-5903SHANE.WELLS@WEYERHAEUSER.COMFRS Number:110006Facility Description:LUMBER MILLSIC Code:2421

Permit Type: B: Add new process to existing facility

NAICS Code: 2421

NAICS Code: 321113

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: WINN
Facility State: LA
Facility ZIP Code: 71422

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: PERMIT WRITER: LOURDES DUGAS, (225) 219-3417 OR LOURDES.DUGAS@LA.GOV

Permit Notes: COMPLETE APPLICATION DATE = DATE OF ADMINISTRATIVE COMPLETENESS PERMIT ADDRESSES THE KILN

EXPANSION PROJECT, WHICH WILL ALLOW THE DODSON DIVISION TO INCREASE ITS CURRENT PRODUCTION RATE OF LUMBER FROM 208.5 MM BF PER YEAR TO 265 MM BF PER YEAR. THE INCREASE IN LUMBER PRODUCTION WILL BE ACCOMPLISHED BY THE ADDITION OF A FOURTH KILN (DRY KILN 4, 051). OTHER SOURCES AFFECTED BY THE PROJECT ARE THE WOOD-FIRED BOILER (017), FUGITIVE INK EMISSIONS (039), AND MOLD INHIBITOR EMISSIONS (052). SUBSEQUENT TO THE ISSUANCE OF PSD-LA-627(M-3), WEYERHAEUSER DETERMINED THAT THE DODSON DIVISION COULD PRODUCE 265 MILLION BOARD FEET PER YEAR OF LUMBER USING JUST THE 3 EXISTING KILNS. THEREFORE, DRY KILN 4 (051, EQT 32) WILL NOT BE CONSTRUCTED AND WAS REMOVED FROM THE PERMIT WITH PSD-LA-627(M-4), ISSUED NOVEMBER 3, 2016. IN ADDITION, THE VOC BACT LIMITS FOR THE WOOD-FIRED BOILER

(017, EQT 6) WERE REVISED TO 3.45 LB/HR AND 11.80 TPY. THE NEW LIMITS ACCOUNT FOR SEVERAL TOXIC AIR POLLUTANTS THAT WERE INADVERTENTLY EXCLUDED FROM THE VOC TOTAL.

### Process/Pollutant Information

**PROCESS** Wood-Fired Boiler (017, EQT 6)

NAME:

Process Type: 11.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: Wood/bark

**Throughput:** 256.44 MMBTU/H

**Process Notes:** Boiler is subject to 40 CFR 60 Subpart Db and 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.4500 LB/H HOURLY MAXIMUM
Emission Limit 2: 11.8000 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices, including proper fuel feed rates, operating temperatures, oxygen levels, and

maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Subsequent to the issuance of PSD-LA-627(M-3), Weyerhaeuser determined that the Dodson Division could

produce 265 million board feet per year of lumber using just the 3 existing kilns. Therefore, Dry Kiln 4 (051, EQT 32) will not be constructed and was removed from the permit with PSD-LA-627(M-4), issued November 3, 2016. In addition, the VOC BACT limits for the Wood-Fired Boiler (017, EQT 6) were revised to 3.45 lb/hr and 11.80 TPY. The new limits account for several toxic air pollutants that were inadvertently excluded from the VOC total. (See Above) VOC limits changed from 2.58 LB/H to 3.45LB/H and 8.8T /YR to 11.8 T/YR (Updated

by RBLC SYSOP 12/20/16)

### Process/Pollutant Information

**PROCESS** Dry Kiln 1 (033, EQT 15)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 14.00 M BD-FT/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 79.4000 LB/H HOURLY MAXIMUM
Emission Limit 2: 481.3700 T/YR ANNUAL MAXIMUM\*

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good operating practices, including proper design, operation, and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \* 481.37 TPY is an aggregate limit for all four dry kilns.

### Process/Pollutant Information

PROCESS

Dry Kiln 2 (034, EQT 16)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 14.00 M BD-FT/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:79.4000 LB/H HOURLY MAXIMUMEmission Limit 2:481.3700 T/YR ANNUAL MAXIMUM\*

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good operating practices, including proper design, operation, and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \* 481.37 TPY is an aggregate limit for all four dry kilns.

### Process/Pollutant Information

**PROCESS** Dry Kiln 3 (035, EQT 17)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 16.00 M BD-FT/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 90.7400 LB/H HOURLY MAXIMUM
Emission Limit 2: 481.3700 T/YR ANNUAL MAXIMUM\*

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good operating practices, including proper design, operation, and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \* 481.37 TPY is an aggregate limit for all four dry kilns.

## Process/Pollutant Information

PROCESS Dry Kiln 4 (051, EQT 32)

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 16.00 M BD-FT/H

Process Notes: Subsequent to the issuance of PSD-LA-627(M-3), Weyerhaeuser determined that the Dodson Division could produce 265 million board feet per year

of lumber using just the 3 existing kilns. Therefore, Dry Kiln 4 (051, EQT 32) will not be constructed and was removed from the permit with PSD-LA-627(M-4), issued November 3, 2016. In addition, the VOC BACT limits for the Wood-Fired Boiler (017, EQT 6) were revised to 3.45 lb/hr and 11.80 TPY. The new limits account for several toxic air pollutants that were inadvertently excluded from the VOC total.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 90.7400 LB/H HOURLY MAX (SEE NOTE KILN NOT BUILT)
Emission Limit 2: 481.3700 T/YR ANNUAL MAX\*(SEE NOTE KILN NOT BUILT)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good operating practices, including proper design, operation, and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \*481.37 TPY is an aggregate limit for all four dry kilns. Kiln 4 not constructed. See below. Subsequent to the

issuance of PSD-LA-627(M-3), Weyerhaeuser determined that the Dodson Division could produce 265 million board feet per year of lumber using just the 3 existing kilns. Therefore, Dry Kiln 4 (051, EQT 32) will not be constructed and was removed from the permit with PSD-LA-627(M-4), issued November 3, 2016. In addition, the VOC BACT limits for the Wood-Fired Boiler (017, EQT 6) were revised to 3.45 lb/hr and 11.80 TPY. The new limits account for several toxic air pollutants that were inadvertently excluded from the VOC total.

### Process/Pollutant Information

**PROCESS** Fugitive Ink Emissions (039, FUG 4)

NAME:

**Process Type:** 99.999 (Other Miscellaneous Sources)

Primary Fuel: Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3400 LB/H HOURLY MAXIMUM
Emission Limit 2: 1.2100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good housekeeping practices and the use of low VOC materials when possible. Good housekeeping practices

include keeping containers closed and minimizing spills and leaks to the maximum extent practical.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

## Process/Pollutant Information

**PROCESS** Mold Inhibitor Emissions (052, FUG 5)

NAME:

**Process Type:** 99.999 (Other Miscellaneous Sources)

Primary Fuel:
Throughput:
Process Notes:

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.9400 LB/H HOURLY MAXIMUM
Emission Limit 2: 3.2800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good housekeeping practices and the use of low VOC materials when possible. Good housekeeping practices

include keeping containers closed and minimizing spills and leaks to the maximum extent practical.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

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## **Facility Information**

RBLC ID: AL-0257 (final) Date Determination

Last Updated: 02/09/2015
Corporate/Company Name: WEST FRASER, INC. Permit Number: 206-5004-X005

Facility Name: WEST FRASER-OPELIKA LUMBER MILL Permit Date: 11/01/2013 (actual)

Facility Contact:JIM MCMILLAN 334-749-6281 JIM.MCMILLAN@WESTFRASER.COMFRS Number:110003033155Facility Description:SAWMILLSIC Code:2421

Facility Description:SAWMILLSIC Code:2421Permit Type:B: Add new process to existing facilityNAICS Code:321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: LEE
Facility State: AL
Facility ZIP Code: 36801

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Permit Notes: NONE NAICS CODE: 321113

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 329.0000 (Tons/Year)

### Process/Pollutant Information

PROCESS Two(2) 87.5 MMBF/YR Continuous kilns with a 35 MMBtu/hr direct-fired wood burner

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Wood Shavings **Throughput:** 175.00 MMBF/YR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.7600 LB/MBF

Emission Limit 2: 175.0000 K/12 MONTHS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Pollutant/Compliance Notes:

Previous Page

**Facility Information** 

RBLC ID: AR-0123 (final) Date Determination
Last Updated:

Corporate/Company Name: DELTIC TIMBER CORPORATION Permit Number: 697-AOP-R13

Facility Name: DELTIC TIMBER CORPORATION WALDO Permit Date: 10/18/2013 (actual)

Facility Contact: JIM PHILLIPS 8708816425 JIM\_PHILLIPS@DELTIC.COM FRS Number: 110017420487

Facility Description: DELTIC WILL CONSTRUCT ONE NEW CONTINUOUS STEAM HEATED

KILN AND MODIFY TWO EXISTING STEAM HEATED BATCH KILNS TO BECOME CONTINUOUS STEAM HEATED KILNS. LUMBER PRODUCTION

WILL INCREASE FROM 215 MMBF/YR TO 285 MMBF/YR.

Permit Type: D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 321113

facility)

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: COLUMBIA

Facility State: AR
Facility ZIP Code: 71770

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Permit Notes: DELTIC WILL CONSTRUCT ONE NEW CONTINUOUS STEAM HEATED KILN AND MODIFY TWO EXISTING STEAM

HEATED BATCH KILNS TO BECOME CONTINUOUS STEAM HEATED KILNS. LUMBER PRODUCTION WILL INCREASE

FROM 215 MMBF/YR TO 285 MMBF/YR.

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 559.4000 (Tons/Year)

## Process/Pollutant Information

PROCESS KILN NO. 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel:
Throughput:

**Process Notes:** 7.7 MBF/HR STEAM HEATED CONTINUOUS KILN SOUTHERN YELLOW PINE

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 27.0000 LB/H

**Emission Limit 2:** 

**Standard Emission:** 3.5000 LB/1000 BF

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) PROPER KILN OPERATION

02/19/2016

2421

SIC Code:

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS

KILN NO. 4

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

0

Primary Fuel: Throughput:

Process Notes: 13.2 MBF/HR STEAM HEATED CONTINUOUS KILN SOUTHERN YELLOW PINE

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 46.2000 LB/H

**Emission Limit 2:** 

**Standard Emission:** 3.5000 LB/1000 BF

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS KILN NO. 5

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel:
Throughput:

Process Notes: 7.7 MBF/HR STEAM HEATED CONTINUOUS KILN SOUTHERN YELLOW PINE

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

 $Pollutant \ Group(s): \qquad \qquad (\ \ \ Volatile \ Organic \ Compounds \ (VOC) \ )$ 

Emission Limit 1: 27.0000 LB/H

**Emission Limit 2:** 

**Standard Emission:** 3.5000 LB/1000 BF

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

### Process/Pollutant Information

7/16/2020

PROCESS WOOD-FIRED BOILER #1

NAME:

**Process Type:** 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: WOOD RESIDUE
Throughput: 60.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 4.2000 LB/H
Emission Limit 2: 18.4000 T/YR
Standard Emission: 0.0700 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NSPS, NESHAP

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS WOOD-FIRED BOILER #2

NAME:

Process Type: 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: WOOD RESIDUE
Throughput: 60.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1:4.2000 LB/HEmission Limit 2:18.4000 T/YRStandard Emission:0.0700 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NSPS, NESHAP

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS WOOD-FIRED BOILER #3

NAME:

Process Type: 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

**Primary Fuel:** WOOD RESIDUE **Throughput:** 60.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 4.2000 LB/H
Emission Limit 2: 18.4000 T/YR
Standard Emission: 0.0700 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

RBLC ID: AL-0259 (final) Date Determination

**Last Updated:** 02/09/2015

Corporate/Company Name: THE WESTERVELT COMPANY
Facility Name: THE WESTERVELT COMPANY

 Permit Number:
 406-5003-X016

 Permit Date:
 08/21/2013 (actual)

Facility Contact: KEITH DOLLAR 205-562-5475 KDOLLAR@WESTERVELT.COM

FRS Number: 110017414626

USA

Facility Description: Sawmill

Permit Type: C: Modify process at existing facility

**SIC Code:** 2421 **NAICS Code:** 321113

Permit Type: C: Modify process at existing is Permit URL:

COUNTRY:

EPA Region: 4

Facility County: HALE
Facility State: AL
Facility ZIP Code: 35474

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

Permit Notes: NAICS Code: 32113

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Volatile Organic Compounds (VOC) 167.8500 (Tons/Year)

Process/Pollutant Information

PROCESS Three (3) 93 MMBF/Y Continous, Dual path, indirect fired kilns

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: Steam (Indirect heat)

Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.5700 LB/MMBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Emission limit is for each kiln

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**Facility Information** 

RBLC ID: AR-0135 (final) Date Determination
Last Updated:

Corporate/Company Name:WEST FRASER, INC.Permit Number:57-AOP-R6Facility Name:WEST FRASER, INC. (LEOLA LUMBER MILL)Permit Date:08/05/2013 (actual)

Facility Contact: TIM NEWTON 8707656217 TIM.NEWTON@WESTFRASER.COM FRS Number: Not Entered

Facility Description: THE LUMBER MILL RECIEVES LOGS THAT ARE DEBARKED, CUT AND SIC Code: 2421

SAWN TO DESIRED LENGHTS, DRIED IN INDIRECT HEATED KILNS AND THEN PLANED TO FINISH REQUIREMENTS. THE FACILITY INCLUDES BY PRODUCT HANDLING OF BARK, SAWDUST, CHIPS, PLANER SHAVINGS AND DRY TRIM. THE FACILITY OPERATES MULTIPLE WOODFIRED BOILERS, TWO CONTINOUS DUAL PATH KILNS, SEVERAL CYCLONES, DEBARKERS, SAWS, A PLANER MILL AND AN EMERGENCY RICE. THERE ARE VARIOUS FUGITIVE EMISSIONS RESULTING FROM

ROADS AND MATERIAL LOADING AND TRANSPORT.

Permit Type: D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 321113

facility)

Permit URL: HTTP:

EPA Region: 6 COUNTRY: USA

Facility County: GRANT
Facility State: AR
Facility ZIP Code: 72084

Permit Issued By: ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

Other Agency Contact Info: PERMIT ENGINEER: AMANDA LEAMONS

LEAMONSA@ADEQ.STATE.AR.US

501-682-0825

Permit Notes:

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 859.8000 (Tons/Year)
Nitrogen Oxides (NOx) 235.8000 (Tons/Year)
Particulate Matter (PM) 111.8000 (Tons/Year)
Sulfur Oxides (SOx) 23.3000 (Tons/Year)
Volatile Organic Compounds (VOC) 500.5000 (Tons/Year)

Process/Pollutant Information

PROCESS LUMBER KILN, CONTINUOUS, INDIRECT

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 275.00 MMBF/YR

**Process Notes:** TWO, NEW, CONTINUOUS DUAL-PATH, INDIRECT HEATED KILNS REPLACED FOUR BATCH, INDIRECT HEATED KILNS. THE

KILNS ARE SUPPLIED WITH STEAM FROM MULTIPLE (EXISTING) WOOD-FIRED BOILERS.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.5000 LB/MBF

08/15/2016

**Emission Limit 2:** 481.3000 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**BACT-PSD** Case-by-Case Basis:

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** 

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes: 130.2 LB/H TOTAL FOR BOTH KILNS BOTH KILNS ARE GROUPED TOGETHER FOR THE HOURLY

AND ANNUAL EMISSION LIMITS.

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**Facility Contact:** 

**Facility Information** 

**RBLC ID:** SC-0151 (final) **Date Determination** 

Last Updated:

Corporate/Company Name: WEST FRASER TIMBER CO. LTD **Permit Number:** 1780-0007-CG WEST FRASER - NEWBERRY LUMBER MILL 04/30/2013 (actual) **Facility Name: Permit Date:** KEITH NELSON 8033211227 KEITH.NELSON@WESTFRASER.COM 110013287987

WEST FRASER OWNS AND OPERATES A LUMBER SAWMILL THAT 2421 **Facility Description:** SIC Code:

PRODUCES FINISHED, DIMENSIONED LUMBER FROM LOGS OF SOUTHERN YELLOW PINE. FACILITY SUBMITTED AN APPLICATION TO REPLACE THE THREE EXISTING BOILERS AND THREE EXISTING BATCH, STEAM HEATED LUMBER KILNS WITH TWO NEW 35 MILLION BTU/HR DUAL PATH, DIRECT FIRED, CONTINUOUS LIMBER KILNS - 15 THOUSAND BF/HR, EACH. PRODUCTION IS EXPECTED TO INCREASE FROM 154 MILLION BF/YR TO 200 MILLION BF/YR. UPGRADES TO THE

PLANER MILL WILL ALSO TAKE PLACE AS PART OF THE PERMIT.

A: New/Greenfield Facility 321113 **NAICS Code: Permit Type:** 

Permit URL:

4 USA **EPA Region: COUNTRY:** 

NEWBERRY **Facility County:** 

SC **Facility State:** 29108 **Facility ZIP Code:** 

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info: KATHARINE BUCKNER

BUCKNEKK@DHEC.SC.GOV

803-898-4123

FACILITY SUBMITTED AN APPLICATION TO REPLACE THE THREE EXISTING BOILERS AND THREE EXISTING BATCH, **Permit Notes:** 

STEAM HEATED LUMBER KILNS WITH TWO NEW 35 MILLION BTU/HR DUAL PATH, DIRECT FIRED, CONTINUOUS LIMBER KILNS - 15 THOUSAND BF/HR, EACH. PRODUCTION IS EXPECTED TO INCREASE FROM 154 MILLION BF/YR TO

200 MILLION BF/YR. UPGRADES TO THE PLANER MILL WILL ALSO TAKE PLACE AS PART OF THE PERMIT.

Process/Pollutant Information

PROCESS TWO - 35 MMBTU/H DUAL PATH, DIRECT FIRED, CONTINUOUS LUMBER KILNS, 15 THOUSAND BF/H, EACH

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

SAWDUST **Primary Fuel:** 

Throughput:

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC **Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC)) 05/04/2016

FRS Number:

**Emission Limit 1:** 3.7600 LB/MBF **Emission Limit 2:** 376.0000 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: **BACT-PSD** 

Other Applicable Requirements:

**Control Method:** (P) PROPER OPERATION AND GOOD OPERATING PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** THE VOC LIMITS ARE TOTAL VOC, NOT ON AN "AS CARBON" BASIS. FACILITY WILL BE

REQUIRED TO TEST ONE KILN TO VERIFY THE VOC EMISSION FACTOR USED.

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**Facility Information** 

AL-0258 (final) **RBLC ID: Date Determination** 

Last Updated: WEST FRASER, INC. 403-5005-X010 Corporate/Company Name: **Permit Number:** WEST FRASER, INC. - MAPLESVILE MILL **Facility Name:** Permit Date: 04/15/2013 (actual)

DAVE MIMS 334-366-1366 DALE.MIMS@WESTFRASER.COM 110054818701 FRS Number: **Facility Contact:** 

Sawmill SIC Code: 2421 **Facility Description:** B: Add new process to existing facility 321113 Permit Type: **NAICS Code:** 

Permit URL:

4 USA **EPA Region: COUNTRY:** 

CHILTON **Facility County: Facility State:** AL 36750 **Facility ZIP Code:** 

ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name) Permit Issued By:

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

NAICS Code: 321113 **Permit Notes:** 

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

-711.4300 (Tons/Year) Carbon Monoxide Nitrogen Oxides (NOx) -50.3300 (Tons/Year) -44.1300 (Tons/Year) Particulate Matter (PM) Sulfur Oxides (SOx) -1.2400 (Tons/Year) Volatile Organic Compounds (VOC) 164.9100 (Tons/Year)

Process/Pollutant Information

**PROCESS** Two(2) 100 MMBF/Y Continuous direct fired kiln

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** Wood Residuals Throughput: 200.00 MMBF/YR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

3.7600 LB/MBF **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: **BACT-PSD**  02/10/2015

Other Applicable Requirements: SIP, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Emissions limit is for each kiln. Combined emissions limit is 376 tpy based on maximum capacity of

Previous Page

**Facility Information** 

RBLC ID: SC-0149 (final) **Date Determination** 

Last Updated: 08/27/2014 1860-0128-CA

KLAUSNER HOLDING USA, INC Corporate/Company Name: **Permit Number:** KLAUSNER HOLDING USA, INC 01/03/2013 (actual) **Facility Name: Permit Date:** 

SABINE MERKLE 8436269600 SABINE.MERKLE@KLAUSNER-**Facility Contact:** GROUP.COM

FRS Number:

not available

700 MILLION BOARD FOOT PER YEAR LUMBER MILL 2421 **Facility Description:** SIC Code: A: New/Greenfield Facility **Permit Type:** 

**NAICS Code:** 

321113

Permit URL:

**EPA Region:** 

COUNTRY:

USA

ORANGEBURG **Facility County:** 

SC **Facility State: Facility ZIP Code:** 29133

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name) Permit Issued By:

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

PERMIT WRITER: JO ANNA CUNNNINGHAM Other Agency Contact Info:

(803) 898-4123

**Permit Notes:** 

## Process/Pollutant Information

**PROCESS BIOMASS BOILER EU001** 

NAME:

**Process Type:** 12.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

**Primary Fuel:** WET BARK, WOOD Throughput: 120.00 MMBTU/H

Process Notes:

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM)) 0.0032 LB/MMBTU 3-HOUR **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT **Control Method:** (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes: METHOD 5 FOR FILTERABLE PM POLLUTANT NAME: Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

Emission Limit 1: 0.0320 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to

general) it was changed to "Particulate Matter, Fugitive".

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0320 LB/MMBTU 3-HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

 $\begin{tabular}{lll} \textbf{Other Applicable Requirements:} & NSPS \ , MACT \\ \textbf{Control Method:} & (A) \ ESP \end{tabular}$ 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

 $\begin{tabular}{ll} \textbf{Pollutant Group(s):} & ( \ Particulate \ Matter \ (PM) \ ) \\ \end{tabular}$ 

Emission Limit 1: 0.0320 LB/MMBTU 3-HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT
Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSIBLE PM.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.1400 LB/MMBTU 3-HOUR
Emission Limit 2: 16.8000 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT Control Method: (A) SNCR

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** METHOD 7, 7A - 7E

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.4000 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0170 LB/MMBTU 3-HOUR

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathsf{NSPS}}$  ,  $\ensuremath{\mathsf{MACT}}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: 37.1000 T/YR 12-MONTH ROLLING SUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.9000 T/YR 12-MONTH ROLLING SUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS BIOMASS BOILER EU002

NAME:

**Process Type:** 13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

**Primary Fuel:** WET BARK, WOOD **Throughput:** 120.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0320 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0320 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSIBLE PM.

POLLUTANT NAME: Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1:0.1400 LB/MMBTU 3-HOUREmission Limit 2:16.8000 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS
Control Method: (A) SNCR

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** METHOD 7, 7A-7E

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.4000 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

 $\label{lem:optimization} \textbf{Other Applicable Requirements:} \quad \text{NSPS} \ , \text{MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0170 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: 37.1000 T/YR 12-MONTH ROLLING SUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.9000 T/YR 12-MONTH ROLLING SUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0032 LB/MMBTU 3-HOUR

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0320 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS , MACT
Control Method: (A) ESP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERALBE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to

general) it was changed to "Particulate Matter, Fugitive".

## Process/Pollutant Information

PROCESS NATURAL GAS BOILER EU003

NAME:

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 46.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0360 LB/MMBTU 3-HOUR
Emission Limit 2: 1.6600 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0390 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0030 LB/MMBTU 3-HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to

general) it was changed to "Particulate Matter, Fugitive".

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0020 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

 $\label{eq:other_Applicable} \textbf{Other Applicable Requirements:} \quad \text{NSPS} \ , \text{MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

#### Process/Pollutant Information

PROCESS NATURAL GAS BOILER EU004

NAME:

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 46.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1:0.0360 LB/MMBTU 3-HOUREmission Limit 2:1.6600 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathsf{NSPS}}$  ,  $\ensuremath{\mathsf{MACT}}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0390 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathsf{NSPS}}$  ,  $\ensuremath{\mathsf{MACT}}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0030 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to

general) it was changed to "Particulate Matter, Fugitive".

POLLUTANT NAME: Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0020 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM

# Process/Pollutant Information

PROCESS NATURAL GAS BOILER EU005

NAME:

Process Type: 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 46.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0360 LB/MMBTU 3-HOUR
Emission Limit 2: 1.6600 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0390 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0030 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathsf{NSPS}}$  ,  $\ensuremath{\mathsf{MACT}}$ 

Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to general) it was changed to "Particulate Matter, Fugitive".

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0020 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{MACT}$ 

Control Method: (N

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\,{\rm NSPS}$  ,  ${\rm MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\,{\rm NSPS}$  ,  ${\rm MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

Process/Pollutant Information

PROCESS NATURAL GAS BOILER EU006

NAME:

Process Type: 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 46.00 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0360 LB/MMBTU 3-HOUR
Emission Limit 2: 1.6600 LB/H 1-HOUR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0390 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0030 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathsf{NSPS}}$  ,  $\ensuremath{\mathsf{MACT}}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM. Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to

general) it was changed to "Particulate Matter, Fugitive".

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0020 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\,{\rm NSPS}$  ,  ${\rm MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0050 LB/MMBTU 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{MACT}$ 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOTAL PM (FILTERABLE PLUS CONDENSABLE). METHOD 5 FOR FILTERABLE PM AND METHOD

202 FOR CONDENSABLE PM.

### Process/Pollutant Information

PROCESS LUMBER DRYING KILNS EU007

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 700.00 MILLION BOARD FOOT PER YEAR

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.5000 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: MACT Control Method: (N)

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0220 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: MACT Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Note from RBLC Reviewer: Pollutant entered is no longer a valid pollutant (to general) it was changed to

"Particulate Matter, Fugitive".

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0130 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** MACT **Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.0040 LB/MBF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** MACT **Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

# Process/Pollutant Information

PROCESS PLANER MILL EU008

NAME:

**Process Type:** 30.540 (Board Product Finishing. (e.g. sanders, saws and trimmers))

Primary Fuel:
Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS DRY SHAVING STORAGE SILO EU009

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel:
Throughput: 0

**Process Notes:** SILO FOR STORAGE OF DRY SHAVINGS

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

 ${\bf Other\ Applicable\ Requirements:}$ 

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

## Process/Pollutant Information

**PROCESS** SORTER LINE TRIMMERS EXTRACTION SYSTEM EU011

NAME:

**Process Type:** 30.540 (Board Product Finishing. (e.g. sanders, saws and trimmers))

Primary Fuel: Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

# Process/Pollutant Information

PROCESS FLY ASH STORAGE SILO EU012

NAME:

Process Type: 99.120 (Ash Storage, Handling, Disposal)

Primary Fuel: Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

## Process/Pollutant Information

**PROCESS** COLORS, INKS, LACQUERS EU013

NAME:

**Process Type:** 30.006 (Wood Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0300 LB/MBF 12-MONTH ROLLING AVERAGE

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS DRY SHAVINGS STORAGE SILO EU010

NAME:

**Process Type:** 30.999 (Other Wood Products Industry Sources)

Primary Fuel: Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

**POLLUTANT NAME:** Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0040 GR/DSCF 3-HOUR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** METHOD 5 FOR FILTERABLE PM

Previous Page

**Facility Information** 

RBLC ID: PA-0283 (final) Date Determination
Last Updated:

Corporate/Company Name: GRAYMONT PA INC Permit Number: 14-00002N

Facility Name:GRAYMONT PA INC/PLEASANT GAP & BELLEFONTE PLTSPermit Date:11/19/2012 (actual)Facility Contact:JOHN MAITLAND 814-353-2106FRS Number:110001131061

Facility Description: This plan approval is for the Kiln No. 8 project. WASTE OIL HEATER [BEL], SIC Code:

PROPANE HEATER, PULVERIZED LIMESTONE SYSTEM, 136 HP DIESEL GENERATOR [PG], MISCELLANEOUS EMERGENCY GENERATORS, KILN NO. 8 PROJECT STONE RECLAMATION SYSTEM, PROCESSED STONE HANDLING, LIME KILN DUST HANDLING AND LOADING SYSTEM, LIME

HANDLING AND STORAGE SYSTEM, LIME LOADING SYSTEM, EMERGENCY GENERATOR-ENGINES FOR COOLING FANS, PLS FABRIC

EMERGENCY GENERATOR-ENGINES FOR COOLING FANS, PLS FABRIC COLLECTOR, ROTARY DRYER FABRIC COLLECTOR, STONE RECLAMATION FABRIC COLLECTOR, PROCESSED STONE AND LKD FABRIC COLLECTOR, LIME HANDLING AND STORAGE FABRIC COLLECTOR, LIME LOADING FABRIC COLLECTOR, KILN 6 BAGHOUSE, LIME KILN 7 SEMI-WET SCRUBBER, LIME KILN 7 FABRIC COLLECTOR, KILN NO. 8 BAGHOUSE NATURAL GAS SUPPLY BITUMINOUS COAL SUPPLY PETROLEUM COKE SUPPLY NO. 2 FUEL OIL STORAGE PROPANE STORAGE DIESEL FUEL STORAGE SPACE HEATER EXHAUSTS PLS FABRIC COLLECTOR STACK GENERATOR STACK MISC EMERGENCY GENERATORS STACKS FABRIC

COLLECTOR VENT FABRIC COLLECTOR STACK FABRIC COLLECTOR STACK FABRIC COLLECTOR STACK GENERATOR-ENGINE STACKS KILN 6 STACK LIME KILN 7 STACK KILN NO. 8 STACK PROPANE HEATER EMISSIONS

Permit Type: U: Unspecified NAICS Code: 327410

Permit URL:

EPA Region: 3 COUNTRY: USA

Facility County: CENTRE
Facility State: PA
Facility ZIP Code: 16823

Permit Issued By: PENNSYLVANIA DEPT OF ENVIRONMENTAL PROTECTION, BUREAU OF AIR QUALITY (Agency Name)

MR. ROBERT COOK(Agency Contact) (717)772-3974 rwcook@pa.gov

Other Agency Contact Info: MUHAMMAD Q. ZAMAN,

ENVIRONMENTAL PROGRAM MANAGER, NORTHCENTRAL REGION

570-327-3648

Permit Notes: Pursuant to the plantwide applicability limit (PAL) provisions of 40 CFR § 52.21(aa)(7), the total combined sulfur dioxide (SO2)

emissions, including fugitive emissions, from the facility shall not exceed 302.6 tons in any 12 consecutive month period.

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Sulfur Oxides (SOx) 302.6000 (Tons/Year)
Volatile Organic Compounds (VOC) 50.0000 (Tons/Year)

# Process/Pollutant Information

PROCESS KILN NO. 8

NAME:

**Process Type:** 

90.019 (Lime/Limestone Handling/Kilns/Storage/Manufacturing)

Primary Fuel: Pipeline quality natural gas

Throughput: 0

Process Notes: Source ID P418 consists of a 660 tons per day, twin-shaft vertical lime kiln, designated as Kiln No. 8, that is equipped with 66 natural gas fuel

delivery lances (2 sets of 33) with a total approximate heat input (HHV) equal to 100.4 MMBtu/hr. The air contaminant emissions from the kiln shall be controlled by the installation of ID C418 which is a pulse jet fabric collector, designated as 328-PDC-870. The fabric collector shall have a minimum fabric area of 25,536 square feet and handle no more than 75,000 actual cubic feet per minute. The permittee shall install, maintain, certify and operate a continuous emission monitoring system (CEMS) for nitrogen oxides (expressed as NO2), carbon monoxide, and sulfur oxides

(expressed as SO2) emissions and opacity monitoring.

02/26/2020

32.74

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 17 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 2.2500 LB/H FILTERABLE AND CONDESABILE PM

Emission Limit 2: 0.0040 GRAIN/DSCF FILTERABLE PM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER
Control Method: (A) Baghouse

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0030 GRAINS/DSCF FILTERABLE

Emission Limit 2: 1.9100 LB/H FILTERABLE AND CONDENSABLE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER
Control Method: (A) Baghouse

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq$  2.5  $\mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0020 GRAINS/DSCF FILTERABLE

Emission Limit 2: 1.5600 LB/H FILTERABLE AND CONDENSABLE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER
Control Method: (A) Baghouse

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Oxides (SOx)

CAS Number: 7446
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))
Emission Limit 1: 23.0000 LB/H ROLLING 30-DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

Emission Limit 1:10.0000 % OPACITY FOR ANY 6-MINUTE BLOCK PERIODEmission Limit 2:20.0000 % OPACITY 20-60% FOR ANY 3-MINUTE BLOCK PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.1000 LB/TON OF LIME

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 7.9000 LB/H ROLLING 30-DAY AVERAGE

Emission Limit 2: 34.6000 T/YR IN ANY 12 CONSECUTIVE MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

Pollutant/Compliance Notes: Expressed as NO2

POLLUTANT NAME: Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 6.9600 LB/H ROLLING 30-DAY AVERAGE

Emission Limit 2: 26.5000 T/YR ANY 12 CONSECUTIVE MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 3.6500 MMBTU/TON LIME (HHV)

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis:BACT-PSDOther Applicable Requirements:NSPSControl Method:(N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))
Emission Limit 1: 500.0000 PPMVD 1-HOUR BLOCK AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: OTHER Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Previous Page

**Facility Information** 

SC-0135 (final) **RBLC ID: Date Determination** 

Last Updated:

04/01/2015

NEW SOUTH COMPANIES, INC. Corporate/Company Name:

Permit Number:

1340-0029-CH

NEW SOUTH COMPANIES, INC. - CONWAY PLANT **Facility Name:** 

Permit Date:

09/24/2012 (actual)

TIM PAPA 8433493463 TIM.PAPA@NEWSOUTH.CANFOR.COM **Facility Contact:** 

FRS Number:

110000740789

**Facility Description:** 

LUMBER MILL THAT PRODUCES STRUCTURAL LUMBER FROM PINE

SIC Code:

2421

LOGS.

A: New/Greenfield Facility

**NAICS Code:** 

11

**Permit Type:** Permit URL:

4 **EPA Region:** 

COUNTRY:

USA

HORRY **Facility County:** SC **Facility State:** 29526 Facility ZIP Code:

Permit Issued By:

SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info:

HETAL PATEL

(803) 898-4123

**Permit Notes:** 

## Process/Pollutant Information

**PROCESS** 

LUMBER KILNS

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

380.56 MMBD-FT/YR Throughput:

**Process Notes:** 

FACILITY IS GOING TO INSTALL TWO STEAM HEATED CONTINUOUS KILNS (EACH RATED AT 85 MILLION BD-FT/YR), MODIFY TWO EXISTING KILNS. THIS PROJECT WILL ALLOW FACILITY TO INCREASE DRYING CAPACITY FROM 173.2 MILLION BD-FT/YR

TO 380.56 MILLION BD-FT/YR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC **Test Method:** Unspecified

(Volatile Organic Compounds (VOC)) **Pollutant Group(s):** 

799.1800 T/YR **Emission Limit 1:** 

4.2000 LB/MBF AS TOTAL VOC **Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

BACT-PSD Case-by-Case Basis:

Other Applicable Requirements:

**Control Method:** (P) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

Pollutant/Compliance Notes:

Previous Page

**Facility Contact:** 

## **Facility Information**

**RBLC ID:** SC-0136 (final) **Date Determination** 

SHIRLEY COLLENTON 8435207229 SCOLLEN@SIMPSON.COM

Last Updated:

FRS Number:

08/27/2014 1140-0008-CG

110040922712

SIMPSON LUMBER COMPANY, LLC Corporate/Company Name: SIMPSON LUMBER COMPANY, LLC **Facility Name:** 

**Permit Number:** 08/29/2012 (actual) **Permit Date:** 

https://cfpub.epa.gov/rblc/index.cfm?action=Reports.ReportComprehensiveReport&ReportFormat=txt

7/16/2020 Format RBLC Report

Facility Description: SIMPSON LUMBER OPERATES A LUMBER MILL OUTSIDE OF SIC Code: 2421

GEORGETOWN, SC AND PRODUCES FINISHED LUMBER OUT OF LOGGED SOUTHERN YELLOW PINE. THE FOLLOWING OPERATIONS TAKE PLACE AT THE FACILITY: SAWMILL OPERATIONS, STEAM GENERATION, LUMBER DRYING AND PLANER MILL OPERATIONS. INSTALLATION OF A NEW DIRECT-FIRED LUMBER DRYING KILN, NEW SHAVINGS HOG AND INCREASES IN OPERATION FROM THE SAWMILL

AND PLANER MILL.

Permit Type: A: New/Greenfield Facility NAICS Code: 321113

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: GEORGETOWN

Facility State: SC Facility ZIP Code: 29440

Permit Issued By: SOUTH CAROLINA DEPT OF HEALTH & ENV CTRL, BUREAU OF AIR QUALITY (Agency Name)

MS. ALYSON HAYES(Agency Contact) (803)898-3836 camitdr@dhec.sc.gov

Other Agency Contact Info: JAMEL BOATRIGHT, (803) 898-4123

Permit Notes: INSTALLATION OF A NEW DIRECT-FIRED LUMBER DRYING KILN, NEW SHAVINGS HOG AND INCREASES IN

OPERATION FROM THE SAWMILL AND PLANER MILL.

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

 Carbon Monoxide
 18.0000 (Tons/Year)

 Nitrogen Oxides (NOx)
 8.0000 (Tons/Year)

 Particulate Matter (PM)
 17.0000 (Tons/Year)

 Sulfur Oxides (SOx)
 2.0000 (Tons/Year)

 Volatile Organic Compounds (VOC)
 104.0000 (Tons/Year)

#### Process/Pollutant Information

PROCESS DIRECT-FIRED LUMBER DRYING KILN NO. 4

NAME:

Process Type: 30.800 (Wood Lumber Kilns)
Primary Fuel: DRY WOOD WASTE
Throughput: 34.00 MMBTU/H

**Process Notes:** MAXIMUM THROUGHPUT OF THE KILN IS 54.7 MMBF/YR

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 104.0000 T/YR **Emission Limit 2:** 3.8000 LB/MBF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) WORK PRACTICE STANDARDS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Previous Page

**Facility Information** 

RBLC ID: CO-0074 (final) Date Determination

**Last Updated:** 05/25/2016

Corporate/Company Name: GCC RIO GRANDE, INC. Permit Number: 98PB0893

Format RBLC Report

Facility Name: RIO GRANDE CEMENT PLANT Permit Date: 07/09/2012 (actual)

Facility Contact: BARBARA HODGSON 719-647-6829 BHODGSON@GCC.COM FRS Number: 110037262636

Facility Description:Portland cement manufacturingSIC Code:3241Permit Type:C: Modify process at existing facilityNAICS Code:327310

Permit URL:

7/16/2020

EPA Region: 8 COUNTRY: USA

Facility County: PUEBLO
Facility State: CO
Facility ZIP Code: 81004

Permit Issued By: COLORADO DEPT OF HEALTH - AIR POLL CTRL (Agency Name)

MR. ROLAND HEA(Agency Contact) (303) 692-3252 Roland.Hea@state.co.us

Permit Notes: This application requests the following changes to the permit: • An increase in permitted clinker production from 950,000 to 1,175,300

tons per year • An increase in the annual amount of raw materials extracted from the quarry from 1,540,000 to 2.245.293 tons per year • An increase in the permitted cement production from 1,050,000 to 1,410,360 tons per year • Addition of Tire Derived Fuel (TDF) as an alternate fuel for the kiln system • An increase in permitted fuel (coal and tire derived fuel) throughput from 122,250 to 198,418 tons per year • Incorporate other minor changes to correct previous errors in calculations and representations • Increases to the following permitted emissions above the PSD significance emission rate (SER) thresholds: o Particulate Matter less than 10 Microns (PM10) (due to a better estimate of condensable PM10 emissions), o Volatile Organic Compounds (VOCs) o Greenhouse Gases (GHG) - primarily Carbon Dioxide (CO2) • Increases to following permitted emissions below the PSD SER thresholds: o Nitrogen Oxides (NOx) – mainly due to engines previously considered as non-road o Sulfur Dioxides (SOx) - mainly due to engines previously considered as non-road o Carbon Monoxide (CO) o Lead The requested increases in PM10, VOC and GHG emissions exceed the PSD major modification thresholds and require that a PSD review including BACT and modeling analyses be performed. The requested increases for all other criteria pollutants

were below the PSD SER thresholds.

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 CO Great Sand Dunes < 100 km

#### Process/Pollutant Information

PROCESS Kiln

NAME:

**Process Type:** 90.028 (Portland Cement Manufacturing)

**Primary Fuel:** 

**Throughput:** 349.00 MMBTU/H

Process Notes: Pyroprocessing of crude in a 5-stage preheater /precalciner and clinkering rotary kiln to produce cement clinker.

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.1490 LB/TON CLINKER 12-MONTH ROLLING AVE

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\,$  MACT , OPERATING PERMIT

Control Method: (P) Good combustion practices and selective quarrying of the limestone raw material

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes:

POLLUTANT NAME: Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))

Emission Limit 1: 0.9500 TON/TON CLINKER 12-MONTH ROLLING AVE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) 1) Continued use of the modern cement process design including the preheater/precalciner kiln system, 2)

Continued use of high energy-efficient equipment systems, and 3) Continued implementation of a sustainability program to reduce overall GHG emissions with the use of new additives, raw materials and fuels consistent with

availability and cost while maintaining the quality of the cement product manufactured.

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

Pollutant/Compliance Notes:

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5800 LB/TON CLINKER 12-MONTH ROLLING AVE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,U\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (A) fabric filters

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: a. Emissions of particulate matter shall be controlled by high temperature filter media dust collector. The

concentration of filterable particulate matter in the dust collector outlet shall not exceed 0.01 grain per dry standard cubic foot. b. Emissions of condensable particulate matter shall be minimized by quarry management practices and by chemical absorption of the condensable particulate matter in the kiln system. Total PM10 emissions (combined filterable and condensable) shall not exceed the BACT limit of 0.58 lb per ton of clinker

produced on a rolling 12 month average.

# Process/Pollutant Information

PROCESS Haul roads

NAME:

**Process Type:** 99.150 (Unpaved Roads)

Primary Fuel:
Throughput:

Process Notes: There are two distinct road classes, plant roads (paved and unpaved) and unpaved roads primarily located in the quarry.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Plant roads – since almost all plant roads are already paved and are actively swept, BACT was determined to

be paved and swept roads. Emissions from unpaved roads shall be controlled by applying water as needed. Quarry roads – The combination of inherent moisture content supplemented by water application as needed was

determined to be BACT for the quarry roads.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS

Storage Piles

NAME:

**Process Type:** 99.190 (Other Fugitive Dust Sources)

**Primary Fuel:** 

Throughput:

Process Notes:

There are two distinct locations for temporary storage piles, those located in the quarry and those located at the plant. In general these outdoor

storage piles are temporary in nature.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) Plant storage – BACT is determined to be use of enclosure (covering the storage pile with tarps) Quarry

storage - BACT is determined to be use of the inherent moisture content supplemented with water application as

needed.

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS Material processing & transfer

NAME:

**Process Type:** 90.028 (Portland Cement Manufacturing)

Primary Fuel: Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0050 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (A) Plant Fabric filters combined with enclosed transfer points was selected as BACT. Quarry The combination

of high material moisture content and partial enclosure was selected as BACT.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Previous Page

**Facility Information** 

RBLC ID: GA-0146 (final) Date Determination

**Last Updated:** 08/01/2012

Corporate/Company Name: SIMPSON LUMBER CO. Permit Number: 2421-103-0004-V-04-1

Facility Name:SIMPSON LUMBER CO, LLC MELDRIM OPERATIONSPermit Date:04/25/2012 (actual)Facility Contact:LINDA BRYAN 9127482219 LBRYAN@SIMPSON.COMFRS Number:0110002438997

Facility Description:LUMBER MILLSIC Code:2421Permit Type:A: New/Greenfield FacilityNAICS Code:423310

Permit URL:

EPA Region: 4 COUNTRY: USA

Facility County: EFFINGHAM

Facility State: GA
Facility ZIP Code: 31318

Permit Issued By: GEORGIA DEPARTMENT OF NATURAL RESOURCES (Agency Name)

MR. ERIC CORNWELL(Agency Contact) (404) 363-7020 Eric.Cornwell@dnr.state.ga.us

**Permit Notes:** 

Process/Pollutant Information

PROCESS KILN 3

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: WASTE WOOD
Throughput: 65000000.00 BF/YR

Process Notes: CONTINUOUS LUMBER KILN - DIRECT FIRED

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

 $Pollutant \ Group(s): \qquad \qquad (\ \ \ Volatile \ Organic \ Compounds \ (VOC)\ )$ 

**Emission Limit 1:** 3.8300 LB/MBF DAILY

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\,$  MACT , SIP , OPERATING PERMIT

Control Method: (P) PROPER MAINTENANCE AND OPERATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS NAME:

KILN 4

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: WASTE WOOD
Throughput: 73000000.00 BF/YR

**Process Notes:** BATCH LUMBER KILN - DIRECT FIRED

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.9300 LB/MBF DAILY

Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: N

**BACT-PSD** Case-by-Case Basis:

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

(P) PROPER MAINTENANCE AND OPERATION **Control Method:** 

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

Pollutant/Compliance Notes:

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Facility Information

Corporate/Company Name:

**RBLC ID:** TX-0607 (final) **Date Determination** 

Last Updated: 02/03/2020 WEST FRASER, INC.

PSDTX892M1 AND **Permit Number:** 

7286

LUMBER MILL 12/15/2011 (actual) **Facility Name: Permit Date:** 

PHILLIP HOUSE (903) 628-2506 PHILLIP.HOUSE@WESTFRASER.COM 110012702851 **Facility Contact:** FRS Number: Two new continuous kilns and new saw line SIC Code: 5211

**Facility Description:** D: Both B (Add new process to existing facility) &C (Modify process at existing 321113 Permit Type: **NAICS Code:** 

facility)

USA 6 **EPA Region:** COUNTRY:

BOWIE **Facility County:** ΤX **Facility State:** 

**Facility ZIP Code:** 75570

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) Permit Issued By:

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

**Permit Notes:** 

Permit URL:

**Affected Boundaries: Boundary Type:** Class 1 Area State: **Boundary:** Distance: CLASS1 AR Caney Creek 100km - 50km

**Pollutant Name: Facility-wide Emissions Increase: Facility-wide Emissions:** 

Volatile Organic Compounds (VOC) 166.5300 (Tons/Year)

Process/Pollutant Information

PROCESS Continuous lumber kilns (2)

NAME:

30.800 (Wood Lumber Kilns) **Process Type:** 

**Primary Fuel:** wood

275.00 MMBF/YR Throughput:

**Process Notes:** Proper operation of the kilns (e.g., drying to the appropriate moisture content)

> POLLUTANT NAME: Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

3.5000 LB/MBF **Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD** Case-by-Case Basis: Other Applicable Requirements: MACT

**Control Method:** (P) proper temperature and process management; drying to appropriate moisture content

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

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**Facility Information** 

LA-0252 (final) **RBLC ID: Date Determination** 

> Last Updated: 12/12/2011

> > 2421

FRS Number:

WEST FRASER TIMBER COMPANY, LTD PSD-LA-701(M1) **Permit Number:** Corporate/Company Name:

JOYCE MILL 08/16/2011 (actual) **Facility Name: Permit Date:** 110006524939

GARY MILHOLLEN 318-648-**Facility Contact:** 3300 GARY.MILHOLLEN@WESTFRASER.COM

PSD modification/consolidation for a sawmill. Convert 3 batch kilns to continuous **Facility Description:** SIC Code:

dual path kilns. Revise VOC BACT from as-carbon to as-VOC. Consolidate PSD-

LA-679 and PSD-LA-701

321113 C: Modify process at existing facility **NAICS Code:** Permit Type:

Permit URL:

**EPA Region:** 6 **COUNTRY:** USA

WINN **Facility County:** LA **Facility State:** 71440 Facility ZIP Code:

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

permit writer:dan nguyen (225) 219-3181 Other Agency Contact Info:

**Permit Notes:** 

# Process/Pollutant Information

**PROCESS** Kipper Boiler No. 1 and No. 2

NAME:

13.120 (Biomass (includes wood, wood waste, bagasse, and other biomass)) **Process Type:** 

**Primary Fuel:** wood residue

58.30 MMBTU/H each Throughput:

**Process Notes:** 

POLLUTANT NAME: Carbon Monoxide

630-08-0 **CAS Number:** 

EPA/OAR Mthd 10 **Test Method: Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 105.5200 LB/H (NOT CHANGED FROM PSD-LA-679)

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: **BACT-PSD** Other Applicable Requirements: N/A **Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

Pollutant/Compliance Notes:

Process/Pollutant Information

PROCESS McBurney Boiler No. 4

NAME:

**Process Type:** 12.120 (Biomass (includes wood, wood waste, bagasse, and other biomass))

Primary Fuel: wood residue
Throughput: 154.20 MMBTU/H

**Process Notes:** 

POLLUTANT NAME: Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10
Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 279.1000 LB/H (NOT CHANGED FRO PSD-LA-679)

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: N/A Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS Lumber kilns

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

**Primary Fuel:** 

**Throughput:** 300.00 million board feet/yr

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC
Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 930.0000 T/YR

**Emission Limit 2:** 

**Standard Emission:** 6.2000 LB/MBF (AS-VOC)

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: N/A

Control Method: (P) properly design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

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# **Facility Information**

RBLC ID: TX-0584 (final) Date Determination

**Last Updated:** 02/03/2020

Corporate/Company Name: TIN INC Permit Number: 1037/PSDTX924M2

7/16/2020 Format RBLC Report

Facility Name: TEMPLE INLAND PINELAND MANUFACTURING COMPLEX

Facility Contact: PATRICK MILLER 936-829-1427 PATMILLER@TEMPLEINLAND.COM

Facility Description: lumber mil

lumber mill

SIC Code:

08/12/2011 (actual) 110035091922

Permit Type:

C: Modify process at existing facility

NAICS Code:

COUNTRY:

Permit Date:

FRS Number:

2421 321212

USA

Permit URL:

EPA Region:

Facility County: SABINE
Facility State: TX
Facility ZIP Code: 75968

Permit Issued By: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MS. ANNE INMAN(Agency Contact) (512) 239-1267 anne.inman@tceq.texas.gov

**Permit Notes:** 

Affected Boundaries:

**Boundary Type:** Class 1 Area State: AR

**Boundary:** Caney Creek

Distance: > 250 km

Process/Pollutant Information

PROCESS

Dry studmill kilns 1 and 2

NAME:

**Process Type:** 30.800 (Wood Lumber Kilns)

Primary Fuel: wood

**Throughput:** 156000.00 boardfeet per charge **Process Notes:** Studmill dry kiln no. 1 being replaced

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.4900 LB VOC/1000 BOARDFEE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, OPERATING PERMIT

Control Method: (N) good operating practice and maintenance

Est. % Efficiency:

 Cost Effectiveness:
 0 \$/ton

 Incremental Cost Effectiveness:
 0 \$/ton

 Compliance Verified:
 Unknown

**Pollutant/Compliance Notes:** 

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