

PERMIT NO. 2448-157-0074-S-01-0

ISSUANCE DATE:



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Twin Mill Pallet and Shavings Plant
Facility Address: 505 Twin Mill Drive
Maysville, Georgia 30558 (Jackson County)
Mailing Address: 1020 Aviation Boulevard
Gainesville, Georgia 30501
Facility AIRS Number: 04-13-157-00074

is issued a Permit for the following:

Construction and operation of a pallet and shavings production facility.

This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification, or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 29036 dated September 28, 2023; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages.



Jeffrey W. Cown, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution, and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not process through Shavings Dryer SD more than 58,000 oven dried tons (ODT) of wood during any twelve consecutive months.
[Avoidance of 40 CFR Part 70]
- 2.2 The Permittee shall not process through Pallet Kilns PK1 and PK2, combined, more than 19,000,000 board feet (19 MMbf) of wood during any twelve consecutive months.
[Avoidance of 40 CFR Part 70]

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- 2.3 The Permittee shall not cause, let, suffer, permit, or allow emissions from any air contaminant source which contains visible emissions, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]
- 2.4 The Permittee shall not cause, let, suffer, permit, or allow any emissions from Pallet Kiln Burner PB:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input.
[391-3-1-.02(2)(d)2.(i)]
 - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]
- 2.5 The Permittee shall not cause, let, permit, suffer, or allow the rate of emissions from manufacturing processes, particulate matter in total quantities equal to or exceeding the following rates:
[391-3-1-.02(2)(e)]
- $E = 4.1 P^{0.67}$; for process input weight rate up to and including 30 tons per hour.
- $E = 55P^{0.11} - 40$, for process input weight rate in excess of 30 tons per hour.
- Where E = emission rate in pounds per hour, and
 P = process input weight rate in tons per hour.
- 2.6 The Permittee shall not burn any fuel other than natural gas in Pallet Kiln Burner PB, unless otherwise specified by the Director.
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 2.7 The Permittee shall not burn any fuel other than natural gas and propane in Shavings Dryer Duct Burner DB, unless otherwise specified by the Director.
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 2.8 The Permittee shall maintain the temperature inside Shavings Dryer SD at or below 284 degrees Fahrenheit (°F).
[Avoidance of 40 CFR Part 70]

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

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4. Process & Control Equipment

Not applicable.

5. Monitoring

- 5.1 The Permittee shall install, calibrate, maintain, and operate a temperature monitoring device for the measurement of the temperature in the center of Shavings Dryer SD. Such temperature monitoring devices shall have an accuracy of $\pm 2\%$ ($^{\circ}\text{F}$). Calibration checks of temperature monitoring equipment shall be performed annually. Data shall be recorded continuously when Shavings Dryer SD is in operation. The recorded data shall be reduced to a 1-hr average and then further reduced to 3-hour rolling averages.
[391-3-1-.02(6)(b)1]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted, and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

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7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354
- 7.2 The Permittee shall maintain monthly records of the total amount of wood processed through Shavings Dryer SD, in ODT, to determine compliance with the throughput limit in Condition 2.1. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. The Permittee shall notify the Division in writing if the throughput through SD exceeds 4,830 ODT during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the throughput limit in Condition 2.1.
[391-3-1-.02(6)(b)1(i)]
- 7.3 The Permittee shall, each month, calculate and record the twelve-month rolling total of the throughput for Shavings Dryer SD, in ODT, using the monthly records required in Condition 7.2. A twelve-month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if the twelve-month rolling total throughput exceeds 58,000 ODT during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the throughput limit in Condition 2.1.
[391-3-1-.02(6)(b)1(i)]
- 7.4 The Permittee shall maintain monthly records of the total amount of wood processed through Pallet Kilns PK1 and PK2, combined and in board feet, to determine compliance with the throughput limit in Condition 2.2. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. The Permittee shall notify the Division in writing if the throughput through PK1 and PK2, combined, exceeds 1,580,000 board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the throughput limit in Condition 2.2.
[391-3-1-.02(6)(b)1(i)]
- 7.5 The Permittee shall, each month, calculate and record the twelve-month rolling total of the throughput for Pallet Kilns PK1 and PK2, combined and in board feet, using the monthly records required in Condition 7.4. The Permittee shall notify the Division in writing if the twelve-month rolling total throughput exceeds 19,000,000 board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the throughput limit in Condition 2.2.
[391-3-1-.02(6)(b)1(i)]

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- 7.6 The Permittee shall maintain records obtained in accordance with Condition 5.1 and demonstrate compliance with the operating limit specified in Condition 2.8. For any 3-hour average dryer temperature above 284°F that is not corrected within the next 24-hour period, the Permittee shall notify the Division in writing of such an excursion and how the Permittee intends to maintain synthetic minor source status under Title V.
[391-3-1-.02(6)(b)1.]

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."