

# Part 70 Operating Permit Amendment

**Permit Amendment No.:** 2421-103-0004-V-04-1      **Effective Date:**

**Facility Name:**            **Simpson Lumber Company, LLC Meldrim Operations**  
911 Old River Road  
Meldrim, Georgia 31318 Effingham County

**Mailing Address:**        911 Old River Road  
Meldrim, Georgia 31318

**Parent/Holding Company:**        Simpson Lumber Company

**Facility AIRS Number:**    04-13-103-00004

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

Install new direct-fired batch lumber drying kiln (Kiln 4) and convert existing direct-fired batch lumber drying Kiln 3 to a continuous lumber drying kiln.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2421-103-0004-V-04-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 20735 dated October 10, 2011; any other applications upon which this Permit Amendment or Permit No. 2421-103-0004-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 2421-103-0004-V-04-0.

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION**

**1.3 Process Description of Modification**

Simpson Lumber Company, LLC Meldrim Operations operates three direct-fired batch lumber drying kilns, a sawmill, and a planer mill. Simpson Lumber proposes to convert Kiln 3 from batch to continuous operation, which will increase the drying capacity of Kiln 3 from 42.0 million board feet per year to 65.0 million board feet per year and construct a new direct-fired batch lumber drying kiln (Kiln 4) with a capacity of 73.0 million board feet per year.

## Title V Permit Amendment

Simpson Lumber Company, LLC Meldrim Operations

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### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

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

#### 3.1.1 Additional and Modified Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
7000	Continuous Direct Fired Lumber Drying Kiln 3	40 CFR 63, Subpart A, 40 CFR 63, Subpart DDDD, 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.4.1, 3.4.3, 3.4.6, 3.4.7	N/A	None
8000	Batch Direct Fired Lumber Drying Kiln 4	40 CFR 63, Subpart A, 40 CFR 63, Subpart DDDD, 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	3.3.1, 3.3.2, 3.4.1, 3.4.3, 3.4.6, 3.4.8	N/A	None
9000	Planer Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.2, 3.4.3, 3.4.9, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7	9400	Planer Mill Trim Block Chipper Cyclone (Stack ID: 9400)
				9600	Planer Mill Shavings Cyclone (Stack ID: 9600)
9301	Fuel Silo	391-3-1-.02(2)(n)	3.4.4, 3.4.5, 3.4.9, 3.4.10, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 6.1.7, 6.2.1	9100	Planer Shavings Truck Bin Cyclone (Stack ID: 9100)
				9200	Planer Shavings Truck Bin Baghouse (Stack ID: 9200)
				9300	Fuel Silo Cyclone (Stack ID: 9300)

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

### 3.2 Equipment Emission Caps and Operating Limits

#### NEW CONDITIONS

- 3.2.1 The Permittee shall not dry more than 65.0 million board feet of lumber per any twelve consecutive months in Lumber Drying Kiln 3 (Emission Unit ID No. 7000).  
[Avoidance of 40 CFR 52.21]
- 3.2.2 The Permittee shall not dry more than 73.0 million board feet of lumber per any twelve consecutive months in Lumber Drying Kiln 4 (Emission Unit ID No. 8000).  
[Avoidance of 40 CFR 52.21]

### **3.4 Equipment SIP Rule Standards**

#### **MODIFIED CONDITIONS**

- 3.4.3 The Permittee shall not discharge or cause the discharge into the atmosphere from the direct fired drying kilns and planer mill (Emission Unit ID No. 5000, 6000, 7000, 8000, and 9000) any gases which exhibit opacity equal to or greater than 40 percent.  
[391-3-1-.02(2)(b)]
- 3.4.6 The Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in the direct-fired drying kilns with Emission Unit ID Nos. 5000, 6000, 7000, and 8000.  
[391-3-1-.02(2)(g)]

#### **NEW CONDITIONS**

- 3.4.7 The Permittee shall not discharge or cause the discharge into the atmosphere from continuous direct-fired drying Kiln 3 (Emission Unit ID No. 7000) any gases which contain VOC in excess of 3.83 pounds per thousand board feet (lb/mbf) lumber dried.  
[40 CFR 52.21 and 391-3-1-.03(2)(c)]
- 3.4.8 The Permittee shall not discharge or cause the discharge into the atmosphere from batch direct-fired drying Kiln 4 (Emission Unit ID No. 8000) any gases which contain VOC in excess of 3.93 pounds per thousand board feet (lb/mbf) lumber dried.  
[40 CFR 52.21 and 391-3-1-.03(2)(c)]
- 3.4.9 The Permittee shall not discharge or cause the discharge into the atmosphere from the Planer Mill Trim Block Chipper Cyclone (Stack ID No. 9400), the Fuel Silo Cyclone (Stack ID No. 9300), or the Planer Mill Shavings Cyclone (Stack ID No. 9600) any gases which contain PM<sub>2.5</sub> in excess of 0.15 lb/ton of material processed.  
[Avoidance of 40 CFR 52.21]
- 3.4.10 The Permittee shall not discharge or cause the discharge into the atmosphere from the Planer Shavings Truck Bin Baghouse (Stack ID: 9200) any gases which contain PM<sub>2.5</sub> in excess of 0.001 lb/ton of material processed.  
[Avoidance of 40 CFR 52.21]

## **PART 4.0 REQUIREMENTS FOR TESTING**

### **4.1 General Testing Requirements**

#### **MODIFIED CONDITION**

4.1.3 Performance and compliance 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. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:

- a. Method 1 shall be used for the determination of sample point locations,
- b. Method 2 shall be used for the determination of stack gas flow rate,
- c. Method 3 or 3A shall be used for the determination of stack gas molecular weight,
- d. Method 4 shall be used for the determination of stack gas moisture,
- e. Method 5 shall be used for the determination of Particulate Matter emissions, and
- f. Method 9 and the procedures contained in Section 1.3 of the above reference document shall be used for the determination of opacity.
- g. Method 201A in conjunction with Method 202 shall be used to determine PM<sub>2.5</sub> concentration.
- h. The procedures of NCASI Wood Products Protocol 1 shall be used to determine VOC concentration from the lumber drying kilns.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

## MODIFIED CONDITIONS

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

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

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

i. **Any twelve consecutive month period during which more than 65.0 million board feet of lumber is dried in Kiln 3 (Emission Unit ID No. 7000).**

ii. **Any twelve consecutive month period during which more than 73.0 million board feet of lumber is dried in Kiln 4 (Emission Unit ID No. 8000).**

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

i. Any time the pressure drop recorded during the daily check required by Condition 5.2.1 is greater than 5 inches of water.

ii. Any failure to carry out an inspection required by Condition No. 5.2.2 or 5.2.4.

iii. Any adverse condition discovered by a weekly inspection, as required by Condition 5.2.2, of any cyclone (APCD ID Nos. 9100, 9300, 9400, and 9600).

iv. Any adverse condition discovered during checks, as required by Condition 5.2.4, of the Planer Shavings Truck Bin Baghouse (APCD ID No. 9200).

v. Any visible emissions from the baghouse (APCD ID No. 9200), which occurs for two consecutive determinations, done to comply with Condition 5.2.3.

## **6.2 Specific Record Keeping and Reporting Requirements**

### **NEW CONDITIONS**

- 6.2.2 For each calendar month, the Permittee shall maintain records of the amount of lumber processed through each of Kilns 3 and 4 (Emission Unit ID Nos. 7000 and 8000), to confirm compliance with the production limits in Conditions 3.2.1 and 3.2.2. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request.  
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.3 The Permittee shall use the monthly production data recorded in accordance with Condition 6.2.2 to calculate the 12-consecutive month total amount of lumber processed through each of Kilns 3 and 4 (Emission Unit ID Nos. 7000 and 8000) for each calendar month in the reporting period. Each 12-consecutive month total shall be included in the semiannual period report specified in Condition 6.1.4. A 12-consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months.  
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]



## **Title V Permit Amendment**

Simpson Lumber Company, LLC Meldrim Operations

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