

Facility Name: **RB Lumber**  
City: Riceboro  
County: Liberty  
AIRS #: 04-13-179-00027

Application #: TV-206561  
Date Application Received: January 8, 2018  
Permit No: 2421-179-0027-V-03-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
<b>SSPP</b>	S. Ganapathy	Manny Patel
<b>ISMU</b>	Joanna Pecko	Dan McCain
<b>SSCP</b>	Daniel Slade	Farhana Yasmin
<b>Toxics</b>	n/a	n/a
<b>Permitting Program Manager</b>		Eric Cornwell

## Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

## **I. Facility Description**

### **A. Facility Identification**

1. Facility Name:RB Lumber
2. Parent/Holding Company Name  
DS Smith Holdings
3. Previous and/or Other Name(s)  
Evergreen Forest Products (till 2006)
4. Facility Location  
2336-2 Interstate Paper Road  
Riceboro, GA 31323
5. Attainment, Non-attainment Area Location, or Contributing Area  
The facility is located in an attainment area.

### **B. Site Determination**

RB Lumber, which includes the Newport Timber operations and Interstate Paper belong to one site for MACT applicability purposes under Title III and that a separate Title V permit can be issued for their (RB lumber mill and the Interstate paper mill) operation, since Interstate Paper does not have any responsible operating authority over the RB Lumber operation.

RB Lumber (lumber mill), Newport Timber and Interstate Paper (paper mill) are located within a contiguous area. The aggregated emissions from Interstate Paper, Newport Timber, and RB Lumber constitute a major stationary source for Title III applicability purpose only. Hence, RB Lumber needs a Title V operating permit.

For RB Lumber and Interstate Paper to be considered one site for Title V and PSD purpose they must:

- a. be contiguous with the adjacent major HAPs source (Interstate Paper mill),
- b. both the lumber mill and the paper mill must be under common control and
- c. both facilities must belong to the same industrial grouping as reflected by the same first two digits of the Standard Industrial Classification (SIC) code.

However, the first two digits of the SIC Code for RB Lumber and Interstate Paper is not the same. Therefore, from Title V and PSD perspective RB Lumber and Interstate cannot be considered to belong to the same Title V/PSD site.

### C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2421-179-0027-E-02-0	January 18, 2018	Transitional permit to RB Lumber

### D. Process Description

#### 1. SIC Codes(s)

2421 – Sawmills and Planing Mills – General

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

#### 2. Description of Product(s)

The facility produces dried lumber, bark, chips, wood shavings and sawdust

#### 3. Overall Facility Process Description

RB Lumber has a contract to supply wood chips and bark to the adjacent Interstate Paper Company from the pulpwood purchased by Interstate. RB Lumber processes logs that are suitable for further processing in the sawmill, the gas-fired kilns, and the planer mill.

The sawmill receives logs by truck. Depending on the size of the logs, the logs are either chipped or sent to the sawmill. The logs are chipped in a whole log chipper, screened for size and conveyed to Interstate, or debarked and continue to the sawmill. The bark and chips are conveyed to Interstate. The chippers, debarkers and the sawmill equipment belongs to Newport Timber LLC.

RB Lumber operates a merchandizing deck that is fed from a crane. Saw logs are cut and conveyed into a sawmill. The unusable portion of the tree goes directly into the chip line and is debarked and chipped. Stems go into the debarker, the bark falling out into the conveyor goes to

the Interstate Paper mill. The debarked logs are transferred to the hew saw where they are chipped/sawn into lumber. The chips and sawdust fall into the chip conveyor. The blocks fall into the block belt and proceed to the small chipper. The chips are conveyed to Interstate Paper via the chip line.

The sawn logs are trimmed by the trimmer. Pieces that cannot be trimmed are discarded and chipped. The trimmed lumber is sorted by size and length, and stacked. The lumber is then dried in one of two gas-fired drying kilns. The dried lumber is staged in the dry lumber sheds and brought to the planer mill to be planed. The Planer mill shavings go to a shaving hopper and cyclone (CY01). The planed lumber is trimmed and blocks and sawdust fall into a conveyor and go to a block hog. The hammered blocks are blown into the hopper. The finished lumber is stored in one of two sheds until it is sold and loaded on trucks. Shavings from the planer mill are blown into a hopper, dumped into shaving vans, and sold.

#### 4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

### E. Regulatory Status

#### 1. PSD/NSR

The facility is a PSD minor source for all PSD pollutants.

#### 2. Title V Major Source Status by Pollutant

**Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM <sub>10</sub>	✓			✓
PM <sub>2.5</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓			✓
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS	n/a			n/a
H <sub>2</sub> S	n/a			n/a
Individual HAP	✓	✓		
Total HAPs	✓	✓		

### 3. MACT Standards

RB Lumber by itself is a minor source of HAPs emissions. However it is part of a Title III site that has the Interstate Paper pulp mill that is a major source of HAPs emissions. Therefore the drying kilns at the facility are subject to all applicable requirements of the 40 CFR 63 Subpart DDDD, the Plywood and Composite Wood Product MACT. For existing drying kilns it is only subject to a one-time notification under this MACT. There are no emission limits under this MACT for existing drying kilns.

### 4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	no
Program Code M – Part 63 NESHAP	yes
Program Code V – Title V	yes

## Regulatory Analysis

### II. Facility Wide Requirements

There are no facilitywide requirements for RB Lumber's Riceboro lumber mill.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SM01	Sawmill Group (includes debarker, saws and chippers)	391-3-1-.02(2)(n)	3.4.3, 3.4.4, 6.2.2	n/a	n/a
DK01	Direct-fired Continuous kiln with a burner fueled with natural gas (20 MMBTU./hr)	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i) 391-3-1-.02(2)(n) 40 CFR 63 Subparts A and DDDD	3.2.1, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 6.1.7, 6.2.1, 6.2.2	n/a	n/a
DK02	Direct-fired Continuous kiln with a burner fueled with natural gas (20 MMBTU./hr)	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i) 391-3-1-.02(2)(n) 40 CFR 63 Subparts A and DDDD	3.2.1, 3.3.1, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 6.1.7, 6.2.1, 6.2.2	n/a	n/a
PM01	Planer mill	391-3-1-.02(2)(b)1 391-3-1-.02(2)(e)1(i) 391-3-1-.02(2)(n)	3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5.1, 5.2.1, 5.2.2, 6.1.7, 6.2.2	CY01	Cyclone

#### B. Equipment & Rule Applicability

Emission and Operating Caps:

The drying kilns are limited to drying a combined total of 50 million board feet of lumber in any consecutive twelve months. This limit is based on EPD's Air Toxics Guidelines.

Rules and Regulations Assessment:

The following rules apply to the drying kilns and the planer mill at this facility.

Georgia Rule 391-3-1-.02(2)(b) – "Visible Emissions," applies to all sources that are subject to at least one other emission limitation and are not subject to any other, more stringent, opacity standard. Georgia Rule (b) limits visible emissions to 40 percent opacity.

Georgia Rule 391-3-1-.02(2)(e) - "Particulate Emission from Manufacturing Processes," where the following equations are used to calculate the allowable rate of emission:

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour}$$

$$E = 55P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour}$$

Where:

E = Emission rate in pounds per hour

P = Process input weight rate in tons per hour.

Georgia Rule 391-3-1-.02(2)(n) – “Fugitive Dust,” which governs fugitive dust emissions. The sawmill must take the steps necessary to minimize fugitive dust. The opacity of fugitive dust shall not exceed 20 percent.

#### C. Permit Conditions

Condition 3.2.1 limits drying from the two drying kilns to a combined total of 50 million boardfeet per year based on EPD’s Air Toxics Guidelines. This is also the limit requested in the permit application.

Condition 3.3.1 subjects the two lumber drying kilns to all applicable requirements of the Plywood and Composite Wood Products (PCWP) MACT ie. 40 CFR 63 Subpart DDDD. This MACT does not have any emission limits for existing lumber mill drying kilns. The only requirement is a one-time notification to EPD.

Condition 3.4.1 states that PM emissions from the lumber drying kilns and the planer mills are subject to Georgia Rule (e).

Condition 3.4.2 subjects the visible emissions from the lumber drying kilns and the planer mills to 40% opacity per Georgia Rule (b).

Condition 3.4.3 is the fugitive emission condition and lists some measure that can be adopted to mitigate fugitive emissions.

Condition 3.4.4 limits fugitive emission to 20% opacity per Georgia Rule (n).

Condition 3.4.5 requires natural gas to be fired in the dryer kiln burners.

Condition 3.5.1 requires the Permittee to operate the planer mill cyclone for PM control whenever the planer mill is operated to ensure compliance with Georgia Rule (e).

#### **IV. Testing Requirements (with Associated Record Keeping and Reporting)**

##### **A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

##### **B. Specific Testing Requirements**

Not applicable.

#### **V. Monitoring Requirements**

##### **A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

##### **B. Specific Monitoring Requirements**

Condition 5.2.1 requires weekly checks/inspection of the planer mill cyclone to ensure efficient operations and PM control.

Condition 5.2.2 requires daily checks of the visible emissions from the planer mill cyclone to ensure efficient operations and PM control.

##### **C. Compliance Assurance Monitoring (CAM)**

The kilns at RB Lumber are uncontrolled; therefore they are not subject to CAM because they do not use a control device to achieve compliance with any such emission limitation or standard per 40 CFR 64.2(a)(2).

The planer mill at RB Lumber is controlled by a cyclone, however, uncontrolled emissions are not greater than the major source threshold of 100 tpy of PM. Uncontrolled emissions of PM/PM10 are 41 tpy. Therefore, the planer mill is not subject to CAM per 40 CFR 64.2(a)(3).



## **VI. Record Keeping and Reporting Requirements**

### **A. General Record Keeping and Reporting Requirements**

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

### **B. Specific Record Keeping and Reporting Requirements**

Condition 6.1.7 requires reporting of any drying in excess of 50 MMBF/year. Any adverse condition discovered during the cyclone check that is not be corrected in 24 hours need to be reported as excursion. Any two consecutive visible emission determinations from the planer mill baghouse also need to be reported as excursion. In addition the Permittee is required to report the rolling total of lumber dried in the drying kilns in the last twelve consecutive months each month in the reporting period.

Condition 6.2.1 requires the Permittee to maintain the combined total 12 month lumber dried in the last twelve consecutive months for each month in order to determine compliance with drying limit in Condition 3.2.1. The drying records need to be maintained for five years.

Condition 6.2.2 requires the Permittee to keep records of all actions taken per Condition 3.4.3 and Section 8.22 of the permit for mitigating fugitive dust at the facility.

## **VII. Specific Requirements**

### **A. Operational Flexibility**

Not applicable.

### **B. Alternative Requirements**

Not applicable.

### **C. Insignificant Activities**

Refer to <http://gatv.georgiaair.org/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

**D. Temporary Sources**

Not applicable.

**E. Short-Term Activities**

Not applicable.

**F. Compliance Schedule/Progress Reports**

Not applicable.

**G. Emissions Trading**

Not applicable.

**H. Acid Rain Requirements**

Not applicable

**I. Stratospheric Ozone Protection Requirements**

Not applicable

**J. Pollution Prevention**

Not applicable

**K. Specific Conditions**

Not applicable

**VIII. General Provisions**

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

**Addendum to Narrative**