



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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AIR PROTECTION BRANCH

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Mr. James Capp, Chief
Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Dear Mr. Capp:

We have reviewed the applicant's October 7, 2011, submission for the Prevention of Significant Deterioration (PSD) permit application for the Meldrim Kiln Project. Simpson Lumber Company, the applicant, proposes to modify their existing lumber mill in Meldrim, Georgia. The emissions units subject to a best available control technology (BACT) analysis include one new direct-fired batch lumber drying kiln with a capacity of 73 million board feet per year (MBF/yr), and one existing 65 MBF/yr capacity lumber drying kiln that will be converted from batch to continuous. The kilns will use good maintenance and operation practices to control emissions. The proposed project is subject to PSD review for volatile organic compounds (VOC).

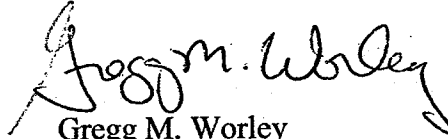
Based on our review of the PSD permit application we have the following comments:

1. The applicant preformed a BACT analysis in Section 4 of the application. The BACT analysis uses a five step "top-down" method to identify the appropriate control technology. The applicant identified several control technologies for VOC emissions in step 1 of the analysis, including a regenerative thermal oxidizer (RTO). The applicant eliminated this technology in step 2 of the analysis due to the cost for additional equipment to prevent fouling and the cost of replacement due to thermal aging. Although, a RTO may be cost prohibitive the applicant must perform a cost analysis in step 4 before eliminating the RTO.
2. The applicant did not specify a VOC BACT limit for the lumber drying kilns; however, the emissions calculations used to calculate the potential emissions for the new lumber drying kiln was 3.83 lb/MBF, and the emission factor for the converted kiln was 3.93 lb/MBF. It is our understanding that there are VOC BACT limits for wood lumber kilns currently in permits that are lower than those proposed in the application. In the RACT/BACT/LAER Clearinghouse other facilities with larger or equivalent capacities had a VOC limit for wood lumber kilns of 3.5 lb/MBF, (e.g., Potlatch Corporation, AR). Based on review of the information available, the lower VOC limits are technically feasible and should be considered as an option in the BACT analysis.

3. The emissions values in the application differ from the values listed in Appendix B, Application Forms. Appendix A contains the emission calculations for the application. The U.S. Environmental Protection Agency requests a clarification, or an update, to account for this difference.

If you have any questions regarding these comments or need additional information, please contact Eva Land at 404-562-9103.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregg M. Worley". The signature is fluid and cursive, with the first name "Gregg" being more prominent.

Gregg M. Worley
Chief
Air Permits Section