

PERMIT AMENDMENT NO. 2421-107-0032-V-02-3

ISSUANCE DATE: 08/03/2023



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Faircloth Forest Products
Facility Address: 201 Pinetree Trail
Swainsboro, Georgia 30401 (Emanuel County)
Mailing Address: 1377 Old Nunez Road
Swainsboro, Georgia 30401
Parent/Holding Company: Faircloth Forest Products
Facility AIRS Number: 04-13-107-00032

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:

The construction and operation of a direct-fired continuous lumber drying kiln and the upgrade of the existing reman mill cyclone.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

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 Amendment and Permit No. 2421-107-0032-V-02-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This 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. 644755 dated February 28th, 2022; any other applications upon which this Amendment or Permit No. 2421-107-0032-V-02-0 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 Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 3 pages.



A handwritten signature in black ink, appearing to read 'David B. Dove'.

David B. Dove, Interim Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Faircloth Forest Products (hereinafter “facility) submitted Application No. 644755 on February 28, 2022, for the construction and installation of a direct-fired continuous lumber drying kiln (ID No. DK02) with a 40 MMBtu/hr green wood-fired burner. The modification will also include modification of the reman mill cyclone (ID No. CD01) to accommodate the increase in throughput. Continuous Drying Kiln DK02 will have a design capacity of 80 MMBF/yr.

All other existing equipment at the facility will remain unmodified. The installation of the proposed kiln will result in an increase in the facility’s throughput, but the existing sawmill (ID No. SM01) and reman mill (ID No. REM) will be able to withstand the increase and require no modification.

The proposed continuous drying kiln (ID No. DK02) was originally permitted under the one-time doubling provision for avoidance of Prevention of Significant Deterioration (PSD) review with the issuance of Permit Amendment No. 2421-107-0032-V-02-2. However, because Faircloth Forest Products is under common control alongside LJR Forest Products, the PSD one-time doubling provision should have already been applied when Faircloth Forest Products were initially permitted by SIP Permit No. 2421-107-0032-E-01-0. When Continuous Kiln DK02 was proposed, the combined site was already major under PSD for volatile organic compounds (VOC). Therefore, the construction and operation of Continuous Kiln DK02 is required to undergo a retroactive PSD review because it would result in a VOC emission increase above the PSD significant emission rate (SER).

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 Updated Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SM01	Sawmill (includes debarkers, saws and chippers)	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	N/A	N/A
DK01	Dry Kiln 1 Direct-fired Continuous kiln with a burner fueled with green sawdust and bark (40 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A
DK02	Dry Kiln 2 Direct-fired continuous kiln with a burner fueled with wood (40 MMBtu/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	N/A	N/A
REM	Reman mill with Reman hogger	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	CD01 CD02 CD03	Cyclone 1 Cyclone 2 Cyclone 3

* Modified emission units are in bold

3.2 Equipment Emission Caps and Operating Limits

Modified Condition:

3.2.2 The Permittee shall not process more than 80,000,000 board feet (80 MMbf) of lumber in Dry Kiln 2 (ID No. DK02) during any twelve consecutive months.
[40 CFR 52.21(j)(2) – VOC BACT and Georgia Air Toxics Guidelines]

New Conditions:

3.2.4 Within 180 days after the issuance of this Permit Amendment, the Permittee shall develop and implement a Site-Specific Kiln Emissions Management Plan (KEMP) for Continuous Kiln DK02; identifying general work practice standards to minimize emissions. The program shall be subject to review and modification by the Division. All operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs. With future equipment changes or modifications, the site-specific KEMP may be modified.
[40 CFR 52.21(j)(2) – VOC BACT]

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

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 for which the total amount of lumber dried in Dry Kiln 1 (ID No. DK01) exceeds 92 million board feet.

ii. Any twelve consecutive month period for which the total amount of lumber dried in Dry Kiln 2 (ID No. DK02) exceeds 80 million board feet.

ii. Any time that the fuel burned in Dry Kilns 1 or 2 (ID Nos. DK01 or DK02) does not meet the requirements specified in Condition 3.2.3.

- 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 adverse condition discovered by the weekly inspections of the Reman mill cyclone (ID No. CD01) that is not corrected within 24 hours in accordance with Condition 5.2.1.

ii. Any two consecutive required daily determinations of visible emissions from the Reman mill cyclone (ID No. CD01) requiring action by Condition 5.2.2 a.

iii. Any adverse condition discovered by the inspection specified in the site-specific KEMP required in Condition 3.2.4 that is not corrected promptly.