

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Washington Regional Office
County: Martin
NC Facility ID: 5900107
Inspector's Name: Arni Hopkins
Date of Last Inspection: 05/31/2007
Compliance Code: B/In Violation W/regard To Em & Compl

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): Weyerhaeuser Company Wood Products - Plymouth Facility Address: Weyerhaeuser Company Wood Products - Plymouth Mill Road Plymouth, NC 27962 SIC: 2421 / Sawmills & Planing Mills General NAICS: 32211 / Pulp Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:	
Contact Data			Application Data	
Facility Contact	Authorized Contact	Technical Contact	Application Number: 5900107.05A Date Received: 06/29/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06389/T15 Existing Permit Issue Date: 02/14/2007 Existing Permit Expiration Date: 11/30/2011	
Vernetta Rascoe Environmental Coordinator (252) 791-3242 PO Box 787 Plymouth NC, 27962	Rob Oehrli Plant Manager (252) 791-3228 PO Box 787 Plymouth NC, 27962	Vernetta Rascoe Environmental Coordinator (252) 791-3242 PO Box 787 Plymouth NC, 27962		
Review Engineer: Charles Yirka for Purva Prabhu Review Engineer's Signature: _____ Date: August 22, 2007			Comments / Recommendations: Issue 06389/T16 Permit Issue Date: Permit Expiration Date:	

1. Purpose of Application

Permit 06389T13 was issued on July 4, 2001 and it expired on April 30, 2006. The renewal application was received on June 29, 2005 or at least nine months prior to the expiration date.

Weyerhaeuser Company Wood Products – Plymouth is currently operating under permit 06389/T15, which was issued on February 14, 2007 and expires on November 30, 2011 or the date the renewal of Permit No. 06389T13 has been issued or denied.

2. Facility Description

The Weyerhaeuser Company produces finished dried lumber at its Wood Products facility in Plymouth, North Carolina. Tree-length logs of various sizes and grades are debarked, cut to size, and processed through the sawmill where logs are cut into lumber. The rough-cut lumber from the sawmill is stacked and dried in steam heated lumber kilns. The dried lumber is finished by planing and trimming in the planer mill. Bark, chips, sawdust, and planer shavings are shipped offsite as byproducts. The facility is located adjacent to the Domtar Paper Mill (Site No. 07/59/00069). These facilities operate under separate permits and management and produce separate products.

3. Application Chronology

June 29, 2005	Application for renewal (Application No. – 5900107.05A) was received in WARO. Facility submitted the following: <ul style="list-style-type: none">• Form AA, AA2 and E5
May 9, 2006	Regional comments were received and copy is attached.
August 1, 2005	Acknowledgement letter was sent to the facility.
March 10, 2006	Addendum to the renewal application was received from the facility. This addendum requested the following: <ul style="list-style-type: none">· Addition of existing dry kiln ES-11-4S and ES-11-5S to the air permit.· Addition of existing second debarker F-7-2 to the air permit.· Addition of following insignificant sources to the air permit.<ul style="list-style-type: none">§ Two 250 gallon above ground storage tank. (T-7a and b)§ Two chippers· Addition of temporary boilers to the air permit· Discussion of CAM applicability to emission sources. All of the above issues except CAM applicability were evaluated during the permit modification for permit No. 06389T14. Please see air permit review for revision 14 for more details.
July 3, 2007	Draft permit and review was sent to the Permittee and region
July 16, 2007	Received comments from Amy Marshall, consultant to the facility.
July 25, 2007	Revised air dispersion modeling was received from Amy Marshall to comply with Last MACT air toxics. The modeling was submitted as addendum to the renewal application.
July 26, 2007	Received comments from the region.
August 9, 2007	Revised air dispersion modeling was approved by Jerry Freeman of the AQAB

4. Permit History

The following list provides a very brief summary of the Title V permit revisions for this facility:

Permit No.	Issuance Date	Description of revision
06389T13	July 4, 2001	Initial TitleV Permit
06389T14	December 22, 2006	TV-Minor modification - This application requested to move the sprinkler lines in Kiln No. 3 through 5 above the height of kiln door openings to allow an additional six layers of lumber per charge for these kilns.
06389T15	February 12, 2007	Administrative amendment - To correct definition of “Deviation” under general condition I.A

5. Facility compliance status / Statement of compliance

This facility was last inspected by Mr. Arni Hopkins of WARO on May 31, 2007. The facility was found to be in NON-COMPLIANCE with General Permit Conditions 3.A.6. and 3.F. These sections deal with the proper operation of permitted equipment to minimize air pollution. The facility did not correctly operate the damper in a return line below bagfilter CD-11-1F, which allowed particulate to be discharged directly to the atmosphere. The problem was fixed during the time of inspection. Notice of Violation was sent to the facility on June 4, 2007.

The inspector made the following comments regarding the air permit in the review that was received on May 9, 2006:

- Add Dry Kiln No.1 and Dry Kiln No.2 (ES-11-4S and ES-11-5S) to Section 1 of the permit.
- Add a second debarker to the permit.
- Add two previously existing 250-gallon gasoline storage tanks to the insignificant activities list.
- Add two previously existing chippers to the insignificant activities list.

All of the above issues were evaluated during the permit modification for permit No. 06389T14. Please see air permit review for revision 14 for more details.

6. Regulatory Review

Regulatory review is given in the following table:

Emission Source ID	Applicable Regulations	
ES-11-4SES-11-5SES-11-6SES-11-7SES-11-8S	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
ES-11-1S, ES-30, ES-31, F-7, F-7-2	15A NCAC 2D .0512	Particulates from miscellaneous wood products finishing plants
	15A NCAC 2D .0521**	Control of Visible Emissions
Facility wide emission sources	15A NCAC 2D .1806	Control and prohibition of odorous emissions
	15A NCAC 2D .1100	Toxic Air Pollutants
	15A NCAC 2Q .0705	Last MACT/air toxics demonstration

** 2D .0521 is updated as per latest shell language. There has been no change in other applicable regulations.

7. NSPS, NESHAPS/MACT, PSD, attainment status, 112(r), CAM

NSPS – Not applicable

NESHAPS/MACT –

The facility's five steam heated lumber kilns (ID Nos. ES-11-4S, ES-11-5S, ES-11-6S, ES-11-7S and ES-11-8S) are subject to 40 CFR 63, Subpart DDDD, Plywood and Composite Wood Products Manufacturing MACT. These kilns, while being subject to the rule, have no applicable requirements other than initial notification. This has been noted in the permit.

PSD – The facility is PSD major source for VOC.

Attainment status- - This facility is located in Martin County. As per 40 CFR 81.334, Martin county is in attainment of NAAQS for all criteria pollutants.

112(r) –The facility is not subject to 112(r) requirements because it does not store any of the covered chemicals. This application does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have potential pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Following emission sources have a control devices:

Emission Source ID Nos.	Emission Source Description	Control Device ID No.	Control Device Description
ES-11-1S	Planer	CD-7C CD-11-1F	cyclone (176 inches in diameter) in series with a bagfilter (4,923 square feet in filter area)
ES-30	dry trimmer	CD-30C CD-30F	cyclone (88 inches in diameter) in series with a bagfilter (1,658 square feet in filter area)
ES-31	planer mill hog	CD-31C CD-31F	cyclone (104 inches in diameter) in series with a bagfilter (1,658 square feet in filter area)

Emission sources as listed in above table uses a control device and are subjected to emission limitation as defined in 15A NCAC 2D .0512. Hence if these sources have potential pre-controlled emissions above the major source threshold then they will be subjected to CAM requirements.

ES-11-1S (Planer)– As per NCDAQ woodworking spreadsheet, there will not be any PM10 emissions from planning operations. Hence CAM is not applicable.

ES-30 (Dry trimmer) – Emissions from this process should be similar to sawing operation. Sawdust generated from the process is collected and pneumatically conveyed through a cyclone and collected in a bin. Exhaust from the cyclone is further controlled by the bagfilter. The facility claims that the cyclone is inherent part of the process and potential emissions should be evaluated at the inlet of the bagfilter. Particulate loading to the inlet of the bagfilter is 23 pounds per hour as per submitted in original Title V application (pages are attached). According to NCDAQ woodworking spreadsheet, potential pre-controlled PM-10 emissions are 1.9 tons per year. Hence CAM is not applicable.

ES-31 (Planer mill Hog) – Planer mill hog is used to hog end trim produced by the dry end trimmer and other unused wood pieces. Chips are pneumatically conveyed by a cyclone and bagfilter system for collection in a storage bin. As per NCDAQ woodworking spreadsheet, there will not be any PM10 emissions from milling and hog operation. This operation can also be categorized under shaving/chipping and as per NCDAQ woodworking spreadsheet; there will not be any PM10 emissions from this operation. Hence CAM is not applicable.

8. Facility Wide Air Toxics

The existing permit has 2D .1100 and 2Q .0705 in the permit. Refer section 12 for changes to 2D .1100.

9. Facility Emissions Review

The following table represents actual emissions for year 2005 and it is taken from emissions inventory of the facility:

Pollutant	Actual Emissions (tons per year)
Particulate (TSP)	28.18
Particulate (PM-10)	3.07
Particulate (PM-2.5)	0.82
Carbon Monoxide	3.5
Volatile Organic Compounds	416.02
Single largest HAP (methanol)	28.84
All HAPs (combined)	>25

10. Stipulation Review/ Permit Modifications/Changes

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Cover	-	-amended all dates and permit revision numbers -updated language as per latest shell document

All	Header	-amended permit revision number
	Insignificant activities table	-deleted emission source ID No. I-T-6 -changed capacity of tanks I-T-7a and I-T-7b
3, 4	Equipment Table	-removed note for emission sources ES-11-6S, ES-11-7S and ES-11-8S
6	2.1.B.2.c	-updated stipulation 2D .0521
7	2.2.A.2	-updated stipulation 2D .1100 (state only)
7-8	2.2. A.3	-inserted stipulation indicating the facility is in compliance with the 2Q .0705 last MACT requirements (state only)
9-16	General Conditions	-updated general conditions as per latest shell language

Changes made to ESM and permit insignificant activities list

End-dated emission source I-T-6 as it does not exist at the facility.

Changed capacity of tanks I-T-7a and I-T-7b to 550 gallons.

11. Public Notice/EPA and Affected State(s) Review

- A 30-day public notice period and the concurrent 45-day EPA review are required for this application. Affected states will be notified as required.

12. Conclusions, Comments, and Recommendations

All applicable DAQ air requirements should be met. I recommend issuance of the air permit.

Permittee Comments and DAQ Response:

1. In the permit review, under Section 2, facility description, please delete the last 2 sentences in the first paragraph. The facility no longer pressure treats lumber. In section 7, chipping is misspelled.
Response: Above change will be made to the permit.
2. Regarding the insignificant activities list: after further investigation, I-T-6 (500 gal gasoline storage tank) does not exist, and I-T-7a and 7b are 550 gallons each.
Response: Above change will be made to the permit.
3. Throughout the permit, references to Weyerhaeuser pulp and paper mill should be changed to Domtar pulp and paper mill.
Response: Above change will be made to the permit.
4. Condition 2.2.A.2 (state only) - Weyerhaeuser has revised this condition and submitted revised air toxics (dated July 25, 2007) modeling to include only the Weyerhaeuser Plymouth lumber mill sources. Weyerhaeuser does not want to have a permit condition in the renewal permit that links the Weyerhaeuser lumber mill's operation to the Domtar pulp mill's, as they are now separate companies.
Response: Stipulation 2.2.A.2 is updated. Existing toxics limits were replaced consistent with latest air toxics demonstration.
5. Condition 2.2.A.3 (state only) - Please remove the requirement to submit the air toxics modeling 3 months prior to the PCWP MACT compliance date, as a recent court ruling may result in that date being moved up to October 1, 2007. We will submit updated air toxics modeling within the next month. Therefore, in the final renewal permit, this condition can be removed.
Response: Since this comment was received the 2007 date was vacated and the compliance date is now 2008. The latest toxics modeling fulfills the requirements of 2Q .0705 thus the facility is in compliance with 2D .1100 and the requirement to submit a compliance demonstration before the last MACT (excluding the MACT for combustion sources) compliance date.