



Catherine B. Templeton, Director

*Promoting and protecting the health of the public and the environment*

**DATE**

Mr. Tim Papa  
General Manager  
New South Companies, Inc. – Conway Plant  
1283 Highway 501 Business  
Conway, SC 29526

Re: Construction Permit No. 1340-0029-CH-R2

Dear Mr. Papa:

Enclosed is a modified Construction Permit No. 1340-0029-CH-R2. This modified permit will replace the construction permit previously issued on May 13, 2014.

Please be advised that this modified construction permit may include additional or revised periodic reporting requirements with varying submittal frequencies and due dates.

It is important for you and/or an authorized representative responsible for the overall operation of this facility to read this issued permit carefully and to understand all requirements. If any errors or omissions are discovered, please notify Omari Thompson of my staff, via e-mail at [thompson@dhec.sc.gov](mailto:thompson@dhec.sc.gov), or call (803) 898-0968 immediately.

Pursuant to the South Carolina Administrative Procedures Act, any Department decision involving the issuance, denial, suspension, or revocation of a permit or certification may be appealed by the applicant, permittee, licensee, or affected person. Please see the enclosed "Guide to Board Review" for guidelines on filing an appeal.

Sincerely,

Elizabeth J. Basil / Director, Engineering Services Division  
Bureau of Air Quality

EJB:ot: **typist's initials lower case**

Enclosure

cc: Permit File: 1340-0029  
ec: Ted Ambrose, BEHS  
Kathy Ferry ([kathy\\_ferry@yahoo.com](mailto:kathy_ferry@yahoo.com))  
Ernest Rabon ([ernest.rabon@newsouth.canfor.com](mailto:ernest.rabon@newsouth.canfor.com))  
Denise Hall - Air Toxics



# Office of Environmental Quality Control

## Bureau of Air Quality

### PSD Construction Permit

**New South Companies, Inc. – Conway Plant**  
**1283 Highway 501 Business**  
**Conway, SC 29526**

Pursuant to the provisions of the *Pollution Control Act*, Sections 48-1-50(5) and 48-1-110(a), the 1976 *Code of Laws of South Carolina*, as amended, and *South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards*, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit applications received on May 31, 2012, June 19, 2012, and April 25, 2014 as amended.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

**Permit Number: 1340-0029-CH-R2**  
**Issue Date: DATE**

---

**Director, Engineering Services Division**  
**Bureau of Air Quality**

**TABLE OF CONTENTS**

**PART 1            APPLICABILITY**

**PART 2            GENERAL REQUIREMENTS**

- A.    Permit Expiration and Extension
- B.    Permit to Operate
- C.    Fee Assessment and Payment
- D.    Duty to Comply
- E.    Inspection and Entry

**PART 3            FACILITY WIDE GENERAL REQUIREMENTS**

**PART 4            PROJECT DESCRIPTION**

**PART 5            CONSTRUCTION PERMIT REQUIREMENTS**

- A.    Generic Conditions
- B.    Limitations, Monitoring and Reporting
- C.    Conditions for Facility Wide - Limitations, Monitoring and Reporting

**PART 6            ADDITIONAL CONDITIONS**

- A.    Operational Flexibility
- B.    Other

**PART 7            NESHAP REQUIREMENTS**

- A.    NESHAP Periodic Reporting Schedule Summary
- B.    NESHAP General Requirements
- C.    NESHAP Applicable Subpart
  - Applicable Subpart Affected Sources
  - Applicable Subpart Conditions

**PART 8            REPORTING REQUIREMENTS**

- A.    Periodic Reporting Schedule
- B.    Reporting Conditions

**ATTACHMENT A - Modeled Emission Rates**

**ATTACHMENT B – Exempt Sources**

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 3 of 18**

**PART 1 - APPLICABILITY** (S.C. Regulation 61-62.1, Section II)

Condition Number	Condition
1.1	Except as allowed under S.C. Regulation 61-62.1, Section II(A)(1) paragraphs (c) and (d), any person who plans to construct, alter or add to a source of air contaminants, including installation of any device for the control of air contaminant discharges, shall first obtain a construction permit from the Department prior to commencement of construction.
1.2	The owner/operator shall obtain Bureau authorization, as required under S.C. Regulation 61-62.1, Section II(A), prior to making modifications not covered under this construction permit.
1.3	No construction permits shall be required for the sources listed as exempt from the requirement to obtain a construction permit in S.C. Regulations 61-62.1, Section II(B); however, modifications at these facilities may trigger the requirement to obtain a construction permit.
1.4	All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

**PART 2 - GENERAL REQUIREMENTS**

This part describes conditions and provisions applicable to all sources. Specific source category conditions and requirements are contained in Part 5 of this permit.

**PART 2.A - PERMIT EXPIRATION AND EXTENSION** (S.C. Regulation 61-62.1, Section II(A)(4))

Condition Number	Condition
2.A.1	Approval to construct shall become invalid if construction; a. is not commenced within 18 months after receipt of such approval, b. if discontinued for a period of 18 months or more, or c. if construction is not completed within a reasonable time as considered by the Department.
2.A.2	The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
2.A.3	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

**PART 2.B - PERMIT TO OPERATE** (S.C. Regulation 61-62.1 Section II (A) & (F))

Condition Number	Condition
2.B.1	Any source that is required to obtain an air quality construction permit issued by the Department must obtain an operating permit when the new or altered source is placed into operation and shall comply with the requirements of S.C. Regulation 61-62.1 Section II(F).
2.B.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II(F)(2), the permittee may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
2.B.3	The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
2.B.4	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation.
2.B.5	Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 4 of 18**

**PART 2.B - PERMIT TO OPERATE** (S.C. Regulation 61-62.1 Section II (A) & (F))

Condition Number	Condition
2.B.6	The owner/operator shall submit written notification to the Director of Engineering Services and the Regional Air Section Manager of the date construction is commenced, postmarked no later than 30 days after such date.
2.B.7	The owner/operator shall submit written notification to the Director of Engineering Services and the Regional Air Section Manager of the actual date of initial startup of each new or altered source, postmarked within 15 days after such date.

**PART 2.C - FEE ASSESSMENT AND PAYMENT** (S.C. Regulation 61-30)

Condition Number	Condition
2.C.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.

**PART 2.D - DUTY TO COMPLY** (S.C. Regulation 61-62.1, Section II)

Condition Number	Condition
2.D.1	S.C. Regulation 61-62.1, Section II will not supersede any State or Federal requirements nor special permit conditions, unless this regulation would impose a more restrictive emission limit. The owner or operator shall comply with all terms, conditions, and limitations of any Department-issued permit for sources or activities at its facility. A source's permit status may change upon promulgation of new regulatory requirements.

**PART 2.E - INSPECTION AND ENTRY** (S.C. Regulation 61-62.1, Section II(O))

Condition Number	Condition
2.E.1	<p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none"> <li>1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit.</li> <li>2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.</li> <li>3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.</li> <li>4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.</li> </ol>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 5 of 18**

**PART 3 - FACILITY WIDE GENERAL REQUIREMENTS**

This part describes conditions and provisions applicable facility wide. Specific source category conditions and requirements are contained in Part 5 of this permit.

Condition Number	Condition
3.1	<p>In accordance with SC Regulation 61-62.1, Section II(J), for sources not required to have continuous emissions monitors, any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the Department’s local Environmental Quality Control (EQC) Regional office within twenty-four (24) hours after the beginning of the occurrence. The contact information for the local EQC Regional office can be found at <a href="http://www.scdhec.gov/environment/envserv/regions.htm">http://www.scdhec.gov/environment/envserv/regions.htm</a>.</p> <p>The owner or operator shall also submit a written report within thirty (30) days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality (BAQ) and shall include as a minimum, the following:</p> <ol style="list-style-type: none"> <li>1. The identity of the stack and/or emission point where the excess emissions occurred;</li> <li>2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions;</li> <li>3. The time and duration of excess emissions;</li> <li>4. The identity of the equipment causing the excess emissions;</li> <li>5. The nature and cause of such excess emissions;</li> <li>6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction;</li> <li>7. The steps taken to limit the excess emissions; and,</li> <li>8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.</li> </ol>
3.2	<p>Air dispersion modeling (or other method) has demonstrated that this facility’s operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in the air dispersion modeling may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment A of this permit. Higher emission rates may be administratively incorporated into Attachment A of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded. This is a State Only enforceable requirement.</p>
3.3	<p>The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment A, not to exceed the pollutant limitations of this construction permit. Should the facility wish to increase the emission rates listed in Attachment A, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified in condition 3.2. This is a State Only enforceable requirement.</p>
3.4	<p>The owner/operator shall submit a written request to the Director of the Engineering Services Division for a new or revised operating permit to cover any new or altered source postmarked no later than fifteen (15) days after the actual date of initial startup of each new or altered source unless a more stringent time frame is required by regulation. The request should be made using the appropriate Title V modification form. The modification request required by S.C. Regulation 61-62.70.7 shall serve as the request to operate for the purposes of S.C. Regulation 61-62.1 Section II(F)(3).</p>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 6 of 18**

**PART 3 - FACILITY WIDE GENERAL REQUIREMENTS**

This part describes conditions and provisions applicable facility wide. Specific source category conditions and requirements are contained in Part 5 of this permit.

Condition Number	Condition
3.5	<p>All newly permitted and constructed Title V sources and/or Non-attainment Area (NAA) Sources shall complete and submit an emissions inventory consistent with the schedule approved pursuant to S.C. Regulation 61-62.1, Section III. These Emissions Inventory Reports shall be submitted to the Manager of the Emissions Inventory Section of the Bureau of Air Quality (BAQ).</p> <p style="text-align: center;"><b>SCDHEC - BAQ</b>  <b>Emissions Inventory Section</b>  <b>2600 Bull Street</b>  <b>Columbia, SC 29201</b></p> <p>This requirement notwithstanding, an emissions inventory may be required at any time in order to determine the compliance status of any facility.</p>

**PART 4 - PROJECT DESCRIPTION**

Permission is hereby granted to convert the existing continuous kiln (DKN6) (originally permitted under 1340-0029-CH) into a direct-fired unit, equipped with a 35 MMBtu/hr direct-fired burner with a drying capacity of 85 MMbd-ft/yr. Proposed kiln (DKN7) will no longer be constructed. The modification of the two existing steam heated batch kilns (Title V IDs: DKN4 and DKN5) to increase their efficiencies will still be performed. The heat transfer fins will be added to these kilns and the steam traps will be replaced. This proposed kiln expansion project would allow the facility to increase drying capacity from 173.2 million board feet per year (MMbd-ft/yr) to 295.6 MMbd-ft/yr. The increase in drying capacity will also potentially increase annual throughput in the green lumber operations and the planer mill. There will be no modifications to the green lumber operations associated with this project. As part of this project, existing PSD limits will be modified. This project is a major modification and will be subject to SC Regulation 61-62.5, Standards 5.1 and 7.

**PART 5 - CONSTRUCTION PERMIT REQUIREMENTS**

**PART 5.A - GENERIC CONDITIONS**

Condition Number	Equipment/ Control Device ID	Condition
5.A.1	DKN1 – DKN6; UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	<p>In accordance with S.C. Regulation 61-62.1, Section II(J), a copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. A permittee shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods, at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least five (5) years and shall be made available to a Department representative upon request.</p>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 7 of 18**

**PART 5.A - GENERIC CONDITIONS**

Condition Number	Equipment/ Control Device ID	Condition
5.A.2	UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.
5.A.3	UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such.  Any alternative method for monitoring control device performance must be preapproved by the Bureau and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.70.7.
5.A.4	DKN1 – DKN6; UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	Visual Inspection means a qualitative observation of opacity during daylight hours where the inspector records results in a log, noting color, duration, density (heavy or light), cause and corrective action taken for any abnormal emissions. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water.

**PART 5.B - LIMITATIONS, MONITORING AND REPORTING**

**PART 5.B.1 - EQUIPMENT FOR CONSTRUCTION PERMIT CH**

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
DKN1	58.03 million bd-ft/yr Dry Kiln #1 (Batch)	N/A	004
DKN2	58.03 million bd-ft/yr Dry Kiln #2 (Batch)	N/A	005
DKN3	7.45 million bd-ft/yr Dry Kiln #3 (Batch)	N/A	006
DKN4	58.03 million bd-ft/yr Dry Kiln #4 (Batch)	N/A	007
DKN5	29.02 million bd-ft/yr Dry Kiln #5 (Batch)	N/A	008
DKN6	85.00 million bd-ft/yr Dry Kiln #6 (Continuous), direct-fired, equipped with 35 MMBtu/hr burner	N/A	010
<del>DKN7</del>	<del>85.00 million bd-ft/yr Dry Kiln #7 (Continuous)</del> -VOID	N/A	<del>011</del>
UPN1	USNR Planer	CD-PBAG	009



New South Companies, Inc. – Conway Plant  
1340-0029-CH-R2  
Page 8 of 18

**PART 5.B - LIMITATIONS, MONITORING AND REPORTING**

**PART 5.B.1 - EQUIPMENT FOR CONSTRUCTION PERMIT CH**

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
WCS1	Williams Crusher	CD-PBAG	009
UTN1	USNR Trimmer	CD-PBAG	009
PMCY	Planer Mill Transport System, American Metal Products, (Cyclone #1)	CD-PBAG	009

**PART 5.B.2 - CONTROL DEVICES FOR CONSTRUCTION PERMIT CH**

Control Device ID	Control Device Description	Pollutant(s) Controlled
CD-PBAG	Baghouse 1	PM/PM <sub>10</sub> /PM <sub>2.5</sub>

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions
5.B.1	DKN1 – DKN6	Opacity	<p><b>Limits/Standards:</b> In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit opacity greater than 20%.</p> <p><b>State Only:</b> No</p> <p><b>Testing:</b> Not required</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> The permittee shall perform a visual inspection on a daily basis. Logs shall be kept on-site to record all visual inspections, including cause and corrective action taken for any abnormal emissions and visual inspections from date of recording. Reports of any corrective action taken shall be submitted semiannually. If no corrective actions occurred during the reporting period then a letter shall indicate such.</p>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 9 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions						
5.B.2	DKN1 – DKN6	PM	<p><b>Limits/Standards:</b> In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section VIII - Other Manufacturing, particulate matter emissions shall be limited to the rate specified by use of the following equations: for process weight rates less than or equal to 30 tons per hour (<math>E = 4.10P^{0.67}</math>) and for process weight rates greater than 30 tons per hour (<math>E = 55.0P^{0.11} - 40</math>) where E = the allowable emission rate in pounds per hour and P = process weight rate in tons per hour. As such, each process's allowable particulate matter emission limit is limited to the amount shown in the table below at its nominal production rating:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">ID</th> <th style="text-align: center;">Emission Limit (lb/hr)</th> <th style="text-align: center;">Process Weight Rate (tons/hr)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">DKN1-DKN6</td> <td style="text-align: center;">43.01 (total)</td> <td style="text-align: center;">42.17</td> </tr> </tbody> </table> <p><b>State Only:</b> No</p> <p><b>Testing:</b> Not required.</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> The total process weight rate is at or below 42.17 tons/hr.</p>	ID	Emission Limit (lb/hr)	Process Weight Rate (tons/hr)	DKN1-DKN6	43.01 (total)	42.17
ID	Emission Limit (lb/hr)	Process Weight Rate (tons/hr)							
DKN1-DKN6	43.01 (total)	42.17							
5.B.3	DKN1-DKN6	VOC	<p><b>Limits/Standards:</b> In accordance with SC 61-62.5, Standard No. 5.1 - Best Available Control Technology (BACT) / Lowest Achievable Emission Rate ("LAER") and Standard No. 7 - Prevention of Significant Deterioration, VOC emissions from lumber drying kilns (DKN1 – DKN5) combined are limited to 442 tons/yr based on an estimated emission factor of 4.2 lb VOCs/ 1000 board feet. VOC emissions from lumber drying kiln DKN6 is limited to 160 tons/yr based on an estimated emission factor of 3.76 lb VOCs/ 1000 board feet.</p> <p><b>State Only:</b> Yes – SC Reg. 61-62.5, Std 5.1;  No – SC Reg. 61-62.5, Std 7.</p> <p><b>Testing:</b> Not Required</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> The maximum throughput of the lumber kilns combined is permitted at <math>295.56 \times 10^6</math> bd-ft/yr of lumber. The owner/operator must record the actual monthly production rates and calculate the yearly production rate each month on a 12-month rolling sum basis. Semiannual reports, including all recorded parameters and calculated values shall be submitted.</p> <p>The owner/operator shall maintain records of all volatile organic compounds (VOC). These records shall include any records necessary to determine VOC emissions. VOC emissions shall be calculated on a monthly basis and a twelve-month rolling sum shall be calculated for total VOC emissions. The twelve-month rolling sum shall not exceed 442 tons/yr for kilns DKN1-DKN5 and 160 tons/yr for kiln DKN6. Reports of the calculated values and the twelve-month rolling sum shall be submitted semiannually. An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall be included in the initial report. Subsequent submittals of the algorithm and example calculations are unnecessary, unless the method of calculation is found to be unacceptable by the Bureau or if the facility changes the method of calculating emissions and/or changes</p>						

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 10 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions
			<p>emission factors.</p> <p><b><u>Work Practice Standards for Batch Kilns (DKN1-DKN5):</u></b></p> <ol style="list-style-type: none"> <li>1. The lumber kiln drying operation target final moisture content will be 12% or greater.</li> <li>2. The lumber kiln will be operated following a wet-bulb temperature set-point drying schedule of 225°F or lower.</li> <li>3. Routines for preventative maintenance will be as detailed in a monitoring plan based on manufacturer’s recommendations as detailed below.</li> <li>4. Kiln operation control equipment will be calibrated as per manufacturer’s specifications.</li> </ol> <p><b>Daily Routine:</b></p> <ul style="list-style-type: none"> <li>• Inspect wet Bulb socks and replace as needed.</li> <li>• Ensure that all Resistance Temperature Detectors (RTDs) are pointed toward the lumber and in the airflow.</li> <li>• Check all baffles for damage and report problems in writing to the Maintenance Department.</li> <li>• Ensure kiln computer controller, including external alarm (if so equipped) is functioning properly.</li> </ul> <p><b>Weekly Routine:</b></p> <ul style="list-style-type: none"> <li>• Drain oil or water from transducer air supplies.</li> <li>• Clean tracks through kilns.</li> <li>• Ensure all amp-meters and indicator lights are operational on the pre-wired fan panel.</li> </ul> <p><b>Monthly Routine:</b></p> <ul style="list-style-type: none"> <li>• Grease lumber truck wheels.</li> <li>• Check steam traps for blow-by.</li> <li>• Check bearing bolts on fans.</li> <li>• Check motor/fan drive belts.</li> <li>• Inspect kiln walls and doors for deterioration.</li> <li>• Check for leaks at fittings, coil units, hand valves, control valves, traps, check valves, and strainers.</li> <li>• Inspect linkage for security at all joints.</li> <li>• Ensure control room’s air conditioner/heater is working properly for maintaining correct temperature electrical components.</li> <li>• Inspect air-venting motors for proper attachment to the mounting bases; ensure that arms are functioning properly.</li> </ul> <p><b>Semi-Annually:</b></p> <ul style="list-style-type: none"> <li>• Stroke all steam valves and vents.</li> <li>• Check connection on all RTDs.</li> </ul> <p><b>Annually:</b></p> <ul style="list-style-type: none"> <li>• Check calibration of all transducers, valves, and vent control.</li> <li>• Check fan bearing taper lock for looseness or excessive clearance.</li> <li>• Inspect area at base of kiln door for damage.</li> <li>• Inspect all steam traps; repair or replace as needed.</li> <li>• Check the spray system, if in use, for proper adjustment and function.</li> </ul>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 11 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions
			<p><b><u>Work Practice Standards for New Direct-Fired Continuous Kiln (DKN6):</u></b></p> <ol style="list-style-type: none"> <li>1. The lumber kiln drying operation target final moisture content will be 12% or greater for boards, 15% for all other lumber,</li> <li>2. The lumber kiln will be operated following a dry-bulb temperature set-point of 250°F or less.</li> <li>3. Routines for preventative maintenance will be as detailed in a monitoring plan based on manufacturer’s recommendations or at least the minimum:</li> </ol> <p><b>Daily Routine</b></p> <ul style="list-style-type: none"> <li>• Ensure all Resistance Temperature Detectors (RTDs) are working and placed in right place.</li> <li>• Check all lumber entrance/exit baffles for placement and damage and report problems in writing to the maintenance department.</li> <li>• Ensure kiln controls including all alarms are functioning properly.</li> <li>• Check all motors and couplings on the system.</li> <li>• Check all amp meters and indicator lights on pre-wired fan system.</li> <li>• Check air compressor for proper operation and pressure and leaks.</li> </ul> <p><b>Weekly Routine</b></p> <ul style="list-style-type: none"> <li>• Drain water from transducers and air supplies.</li> </ul> <p><b>Monthly Routine</b></p> <ul style="list-style-type: none"> <li>• Check bearing and bolts external to kiln.</li> <li>• Grease fan bearing inside kiln (via external lubrication points).</li> <li>• Check flash tank for leaks.</li> <li>• Check condensate pump bearings and couplings.</li> <li>• Grease kiln car wheels if bearings, inspect plastic if UHMW bushings.</li> <li>• Ensure control room’s air conditional/heater is working properly for maintaining correct temperature for electrical components.</li> </ul> <p><b>Quarterly Routine</b></p> <ul style="list-style-type: none"> <li>• Clean tracks through kilns.</li> <li>• Inspect fans, bearings, and shafts.</li> <li>• Check internal baffles for damage and report problems in writing to the Maintenance Department.</li> <li>• Inspect kiln walls and structure for deterioration.</li> <li>• Check for leaks at fittings, coil units, hand valves, control valves, traps, check valves, and strainers.</li> <li>• Check pusher system for proper operation, hydraulic leaks, and electrical connections.</li> </ul> <p><b>Semiannually</b></p> <ul style="list-style-type: none"> <li>• Check for loose connections on electrical wires and RTDs.</li> <li>• Stroke all steam valves.</li> <li>• Inspect kiln building and foundation for damage and repair.</li> <li>• Check air compressor and all air operated parts.</li> </ul>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 12 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions
			<p><b>Annually</b></p> <ul style="list-style-type: none"> <li>• Check calibration of all transducers, valves, and vent controls.</li> <li>• Check fan bearing taper lock for looseness or excessive wear.</li> <li>• Inspect all steam traps, repair or replace as needed.</li> </ul> <p>4. Kiln operation control equipment will be calibrated as per manufacturer’s specifications.</p> <p><b>Recordkeeping (for all kilns DKN1-DKN6):</b></p> <p>1. Reports shall be manually kept for each day the kiln is in operation. These reports will contain, as a minimum, the date, wet-bulb actual and set-point temperature (batch kilns only), and dry-bulb actual and set-point temperature. These reports will be maintained and kept on-site for a period of five (5) years and shall be made available to a Department representative upon request.</p> <p>2. For each visual inspection, a log book will contain the date, the initials of the personnel conducting the inspection, results of the inspection, documentation of any maintenance performed and any calibration performed on the kiln operation control equipment. The logbook will be maintained and kept on site for a period of five (5) years and shall be made to a Department representative upon request.</p> <p><b>Reporting (for all kilns DKN1-DKN6):</b></p> <p>1. A semiannual report will be submitted, within 30 days of the end of the reporting period, to the Manager of the Technical Management Section, Bureau of Air Quality that documents any incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken.</p>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 13 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions						
5.B.4	UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	PM	<p><b>Limits/Standards:</b> In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section VIII - Other Manufacturing, particulate matter emissions shall be limited to the rate specified by use of the following equations: for process weight rates less than or equal to 30 tons per hour (<math>E = 4.10P^{0.67}</math>) and for process weight rates greater than 30 tons per hour (<math>E = 55.0P^{0.11} - 40</math>) where E = the allowable emission rate in pounds per hour and P = process weight rate in tons per hour. As such, each process's allowable particulate matter emission limit is limited to the amount shown in the table below at its nominal production rating:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Process</th> <th style="text-align: center;">Emission Limit (lb/hr)</th> <th style="text-align: center;">Process Weight Rate (tph)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">UPN1, WCS1, UTN1, PMCY</td> <td style="text-align: center;">39.87 (total)</td> <td style="text-align: center;">112.5</td> </tr> </tbody> </table> <p><b>State Only:</b> No</p> <p><b>Testing:</b> Not required.</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> The owner/operator shall continue to operate and maintain pressure drop gauge on each module of the baghouse. Each parameter shall be recorded daily during source operation. Operational ranges for the monitored parameters have been established to provide a reasonable assurance of compliance. These operational ranges for the monitored parameters shall be derived from stack test data, vendor certification, and/or operational history and visual inspections, which demonstrate the proper operation of the equipment in compliance. These ranges, with supporting documentation and quality assurance procedures have been submitted. The operating ranges may be updated using this procedure, following Bureau approval. Baghouse monitoring data shall be maintained on site. The owner/operator shall submit semiannual reports of the baghouse monitoring data.</p> <p>Any alternative method for monitoring baghouse performance must be pre-approved by the Bureau and shall be incorporated into the permit as set forth in SC Regulation 61-62.70.7.</p>	Process	Emission Limit (lb/hr)	Process Weight Rate (tph)	UPN1, WCS1, UTN1, PMCY	39.87 (total)	112.5
Process	Emission Limit (lb/hr)	Process Weight Rate (tph)							
UPN1, WCS1, UTN1, PMCY	39.87 (total)	112.5							
5.B.5	UPN1/ CD-PBAG; WCS1/ CD-PBAG; UTN1/ CD-PBAG; PMCY/ CD-PBAG	Opacity	<p><b>Limits/Standards:</b> In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p><b>State Only:</b> No</p> <p><b>Testing:</b> Not Required</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> This device is equipped with a control device.</p>						

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 14 of 18**

**PART 5.B.3 - CONDITIONS FOR CONSTRUCTION PERMIT CH**

Condition Number	Equipment /Control Device ID	Regulated Pollutant/ Standard	Conditions
5.B.6	UPN1 WCS1 UTN1 PMCY	PM, PM <sub>10</sub>	<p><b>Limits/Standards:</b> The PM and PM<sub>10</sub> emissions from Planer Mill (Unit ID 03) are limited to &lt; 25 TPY and &lt; 15 TPY respectively. New South Lumber Co., Inc. - Conway Plant is taking this limit to avoid being subject to SC Reg. 61-62.5, Standard 7 for PM and PM<sub>10</sub>.</p> <p><b>State Only:</b> No</p> <p><b>Testing:</b> Not required</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> The planer mill is limited to &lt; 25 TPY of PM emissions and &lt; 15 TPY of PM<sub>10</sub> emissions. New South Lumber Co., Inc. - Conway Plant must operate baghouse at all times when planer mill is operating.</p>
5.B.7	DKN6	NO <sub>x</sub>	<p><b>Limits/Standards:</b> In accordance with SC Regulation 61-62.5, Standard No. 5.2 – Control of Oxides of Nitrogen, Section III, the kiln must be equipped with low NO<sub>x</sub> burners or equivalent technology capable of achieving 30% reduction from uncontrolled levels.</p> <p><b>State Only:</b> No</p> <p><b>Testing:</b> In accordance with SC Regulation 61-62.5, Standard No. 5.2 – Control of Oxides of Nitrogen, Section IV, the owner/operator must perform tune-ups every two years on the burner, a tune-up plan must be developed and kept on file, and records of tune-ups must be kept on site for a minimum of 5 years.</p> <p><b>Monitoring/Record Keeping/Reporting/Other:</b> In accordance with SC Regulation 61-62.5, Standard No. 5.2 – Control of Oxides of Nitrogen, Section IV, records of tune-ups must be kept on site for a minimum of 5 years.</p>

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 15 of 18**

**PART 5.C. - CONDITIONS FOR FACILITY WIDE - LIMITATIONS, MONITORING AND REPORTING**

Condition Number	Regulated Pollutant/ Standard	Conditions
5.C.1	PM, PM <sub>10</sub> , PM <sub>2.5</sub> /Std. 7	<p>The owner/operator shall maintain production rate records, fuel usage records, and any other records necessary to determine PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from kilns 1-6 (DKN1-DKN6). All emissions shall be calculated on an annual basis, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations to kilns 1-6 (DKN1-DKN6).</p> <p>If the annual emissions exceed the baseline actual emissions established within the construction permit application for this project by a significant amount (as defined in S.C. Regulation 62.5, Standard No. 7 (b) (49)) for any regulated NSR pollutant, the owner/operator shall submit a report to the Department within 60 days after the end of such year. The report shall contain the following:</p> <ol style="list-style-type: none"> <li>1. The facility's name, address, and telephone number;</li> <li>2. The annual emissions as calculated pursuant to S.C. Regulation 62.5, Standard No. 7 (r)(6)(iii); and</li> <li>3. Any other information needed to make a compliance determination (<i>e.g.</i>, an explanation as to why the emissions differ from the preconstruction projection).</li> </ol>
5.C.2	Facility Wide	All applicable requirements from construction permit 1340-0029-CH and 1340-0029-CH-R1 have been included in this revised construction permit.

**PART 6 - ADDITIONAL CONDITIONS**

**PART 6.A - OPERATIONAL FLEXIBILITY**

Condition Number	Conditions
N/A	N/A

N/A = Not Applicable

**PART 6.B - OTHER**

Condition Number	Conditions
6.B.1	Per South Carolina Regulation 61-62.6, Control of Fugitive Particulate Matter, Fugitive Particulate Matter (PM) emissions from material handling, process equipment, control equipment, or storage piles will be minimized to the maximum extent possible. This will include proper maintenance of the control system such as scheduled inspections, replacement of damaged or worn parts, etc. Fugitive emissions from dust buildup will be controlled by proper housekeeping and/or wet suppression.

N/A = Not Applicable



**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 16 of 18**

**PART 7 - NESHAP REQUIREMENTS**

**PART 7.A - NESHAP PERIODIC REPORTING SCHEDULE SUMMARY**

NESHAP Part	NESHAP Subpart	Compliance Monitoring Report Submittal Frequency	Reporting Period	Report Due Date
63	DDDD	Initial Notification Only	Initial Notification Only	Initial Notification Only

Note:

1. This table summarizes only the periodic compliance reporting schedule. Additional reports may be required. See specific NESHAP Subpart for additional reporting requirements and associated schedule.
2. This reporting schedule does not supersede any other reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and/or 40 CFR Part 63.

**PART 7.B - NESHAP - GENERAL REQUIREMENTS**

Condition Number	Condition
7.B.1	All NESHAP notifications and reports shall be sent to the South Carolina Department of Health and Environmental Control - Bureau of Air Quality (SCDHEC - BAQ) at the following address: <b>SCDHEC - BAQ</b> <b>Air Toxics Section</b> <b>2600 Bull Street</b> <b>Columbia, SC 29201</b>
7.B.2	All NESHAP notifications and the cover letter to periodic reports shall be sent to the United States Environmental Protection Agency (US EPA) at the following address: <b>US EPA, Region 4</b> <b>Air, Pesticides and Toxics Management Division</b> <b>61 Forsyth Street</b> <b>Atlanta, GA 30303</b>

**PART 7.C - NESHAP PART 63 SUBPART DDDD - AFFECTED SOURCES**

**SUBPART DDDD - National Emission Standards For Hazardous Air Pollutants: Plywood And Composite Wood Products**

Equipment ID	Affected Source Description	MACT Control Device	Non-MACT Control Device
DKN1	58.03 million bd-ft/yr Dry Kiln #1 (Batch)	None	None
DKN2	58.03 million bd-ft/yr Dry Kiln #2 (Batch)	None	None
DKN3	7.45 million bd-ft/yr Dry Kiln #3 (Batch)	None	None
DKN4	58.03 million bd-ft/yr Dry Kiln #4 (Batch)	None	None
DKN5	29.02 million bd-ft/yr Dry Kiln #5 (Batch)	None	None
DKN6	85.00 million bd-ft/yr Dry Kiln #6 (Continuous)	None	None
<del>DKN7</del>	<del>85.00 million bd-ft/yr Dry Kiln #7 (Continuous)</del> <b>VOID</b>	<del>None</del>	<del>None</del>

Part 7.C lists the affected sources as identified in the facility's Notice of Compliance Status and the permit application.  
N/A = Not Applicable

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 17 of 18**

**PART 7.C - NESHAP PART 63 SUBPART DDDD - CONDITIONS**

**SUBPART DDDD - National Emission Standards For Hazardous Air Pollutants: Plywood And Composite Wood Products**

Condition Number	Equipment /Control Device ID	Condition
7.C.1	DKN1-DKN6	This facility is subject to the provisions of 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and DDDD – Plywood and Composite Wood Products. Existing affected sources shall comply with the applicable provisions by the compliance date specified in Subpart DDDD. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
7.C.2	DKN1-DKN6	In accordance with 40CFR63.2252, for process units not subject to the compliance options or work practice requirements specified in 40CFR63.2240 (including, but not limited to, lumber kilns), the owner/operator is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of 40CFR63 Subpart DDDD, or any other requirements in 40CFR63 Subpart A except for the initial notification requirements in 40CFR63.9(b).

**PART 8 - REPORTING REQUIREMENTS**

**PART 8.A - PERIODIC REPORTING SCHEDULE**

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source.)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30

Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.

**PART 8.B - REPORTING CONDITIONS**

Condition Number	Condition
8.B.1	Reporting required in this permit, shall be submitted in a timely manner as directed in Part 8.A of this permit.

**New South Companies, Inc. – Conway Plant**  
**1340-0029-CH-R2**  
**Page 18 of 18**

**PART 8.B - REPORTING CONDITIONS**

<b>Condition Number</b>	<b>Condition</b>
8.B.2	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality, at the address listed below. <b>SCDHEC - BAQ</b> <b>Technical Management Section</b> <b>2600 Bull Street</b> <b>Columbia, SC 29201</b>

DRAFT

# ATTACHMENT A

## Modeled Emission Rates

**New South Companies, Inc. – Conway Plant**

**1340-0029-CH-R2**

**PAGE 1 OF 1**

The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see conditions 3.2 and 3.3).

<b>AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2</b>					
<b>Emission Point ID</b>	<b>Modeled Emission Rates (lbs/hr)</b>				
	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>
Dry Kiln #6	1.49	1.24	0.75	2.31	6.02
Kiln #6 (proposed opening A1)	0.0656	0.0548	0.0330	0.1020	0.2655
Kiln #6 (proposed opening A2)	0.0656	0.0548	0.0330	0.1020	0.2655
Kiln #6 (proposed opening B1)	0.0656	0.0548	0.0330	0.1020	0.2655
Kiln #6 (proposed opening B2)	0.0656	0.0548	0.0330	0.1020	0.2655
Wood Waste Boiler	5.52	5.03	2.47	21.69	59.16

<b>MODELING EXEMPTIONS/DEFERRALS</b>	
<b>SOURCE IDENTIFICATION</b>	<b>EXEMPTION/DEFERRAL BASIS</b>
Wood Waste Boiler, Dry Kilns 1 - 5 ( for facility-wide Std. 8 pollutants)	Standard 8 – Source(s) emits a Hazardous Air Pollutant(s) (HAPs) AND is subject to one or more Federal Maximum Achievable Control Technology (MACT) standard. This exemption only applies to toxic air pollutants regulated by Standard No. 8 that are also the federally regulated HAPs controlled by the MACT standard. Source must be in compliance with MACT standard. (Check with Air Toxics contact to verify)

## ATTACHMENT B

### Exempt Sources

New South Companies, Inc. – Conway Plant

1340-0029-CH-R2

PAGE 1 OF 1

The following table contains a list of activities which are considered insignificant pursuant to South Carolina Regulation 61-62.70.5(c). Sources listed below are not exempt from any otherwise applicable state or federal requirements including, but not limited to, opacity standards, ambient air quality standards, and air toxic standards.

INSIGNIFICANT ACTIVITIES			
Equipment ID	Source Description	Installation Date	Basis
IA-DEBARK	Debarker	2004	SC Regulation 61-62.70.5(c) Insignificant Activity, Criteria <5 TPY & HAPs <0.5 TPY
IA-SMCH1	Chipper # 1	1981	SC Regulation 61-62.70.5(c) Insignificant Activity, Criteria <5 TPY & HAPs <0.5 TPY
IA-SMCH2	Chipper # 2	1998	SC Regulation 61-62.70.5(c) Insignificant Activity, Criteria <5 TPY & HAPs <0.5 TPY
IA-BYP	Byproducts Handling	N/A	SC Regulation 61-62.70.5(c) Insignificant Activity, Criteria <5 TPY & HAPs <0.5 TPY