



STATEMENT OF BASIS
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BAQ Air Permitting Division

Company Name:	Effingham Pellets, LLC	Permit Writer:	Kristen Tucker
Permit Number:	1040-0165-CA	Date:	August 18, 2021

DATE APPLICATION RECEIVED: December 10, 2020

FACILITY DESCRIPTION (SIC CODES/NAICS CODES)

SIC Code: 2499 – Wood Products, Not Elsewhere Classified

NAICS Code: 321999 – All Other Miscellaneous Wood Product Manufacturing

Effingham Pellets is proposing to construct and operate a wood pellet manufacturing facility. The facility will process dried wood shavings into wood pellets with a production capacity of 45,625 ODT/yr. Operations are divided into three main areas: Material Receiving and Storage, Pelletizing Operations, and Pellet Storage and Loadout.

Material Receiving and Storage

Dry material will be brought to the facility via trucks equipped with a walking floor trailer. The dry material trucks will be weighed upon arrival. The shavings will then be unloaded onto the floor of an enclosed building on the site, then loaded with mobile equipment onto a hydraulically operated feed system and enclosed conveyor. The enclosed conveyor system will deliver the material to a small, enclosed storage bin above the pellet box which will contain the pelletizing operations.

Pelletizing Operations

The dry material will be discharged from a feeding hopper, consisting of a small bin with a screw conveyor, into the pellet box. The pellet box contains two major pieces of equipment: the dry hammermill and the pellet mill. The dry hammermill will reduce the particle size of the raw material. The hammermill will be equipped with a product capture bag filter to control PM emissions.

Following the hammermill, the wood fiber is sent through a hopper, then conveyed to the pellet mill. The pellet mill compresses the wood fiber into pellets by rolling and squeezing the material through holes in a die. The process of squeezing the wood generates heat, which causes the wood's natural lignin to flow. The wood lignin acts as a natural glue, holding the pellets together.

The wood pellets proceed directly from the pelletizer to a cooler. Ambient air is used as a cooling medium in a direct-contact heat exchanger. The exhaust air from the pellet cooler will be controlled by a cyclone.

Pellet Storage and Loadout

The finished pellets exit the pellet box through another enclosed conveyor system and are delivered to the silo, which is vented to the atmosphere.

The pellets are discharged out of the silo to a screen (all enclosed) and the accepted pellets land on a belt conveyor (covered but not enclosed) that feeds the truck trailers for off-site transport.

PROJECT DESCRIPTION

The facility is requesting a construction permit for the following equipment and control devices:

- DSHS: Dry Shavings Handling and Storage with Enclosed Conveyor System
- DHM1: PelletBOX No. 1 – Dry Hammermill
 - BF01: Product Capture Fabric Filter
- PB1: PelletBOX No. 1 – Pellet Mill and Pellet Cooler



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- CYC1: Product Capture Cyclone Separator
- PHS: Pellet Handling and Storage with Enclosed Convey System
- SILO1: Pellet Storage Silo

PROCESS MATERIAL RECOVERY

The primary functions of bag filter BF01 and cyclone separator CYC1 are to capture raw material and return it to the process and to keep the process under negative pressure to improve worker hygiene and general housekeeping. Therefore, the sources are considered inherent to the process and the emissions they exhaust will be taken into consideration in calculating uncontrolled potential emissions.

COLLOCATION DETERMINATION

The proposed wood pellet manufacturing plant will be owned and operated by Effingham Pellets on a portion of land owned by the existing Charles Ingram Lumber facility, contiguous with the lumber mill. The Charles Ingram Lumber plant is an existing major source under Title V and PSD (Permit No. 1040-0016) and a major source under Title III/MACT. The primary product is dimensional lumber (SIC 2421, NAICS 32113).

The proposed Effingham Pellets plant will operate under SIC 2499 and NAICS 32199. The plant will be capable of receiving feedstock (dry wood shavings) from numerous suppliers; however, the Charles Ingram Lumber plant is expected to be the primary source of shavings with a contract to provide 35,000 ODT per year. Charles Ingram Lumber shall continue to sell planer shavings (and other byproducts) on the open market.

Ownership of Effingham Pellets will be divided evenly between CMB Effingham LLC and Effingham Biofuel, both with 50% ownership. CMB Effingham is 100% owned by CM Biomass. Charles Ingram Lumber is 40% owner of Effingham Biofuel, with the other 60% owned by upper-level employees of Charles Ingram Lumber. This results in the following ownership breakdown of Effingham Pellets: 50% owned by CM Biomass, 20% owned by Charles Ingram Lumber, and 30% employee owned.

The proposed Effingham Pellets plant will be on contiguous property with Charles Ingram Lumber, and the manufacturing operations for both facilities fall under a single major industrial grouping. On the issue of common control, it was determined that there is no clear majority owner. While Charles Ingram Lumber may have the ability to influence decisions, it does not fully dictate or control operations at Effingham Pellets. Based on the lack of clear majority ownership, the establishment of multiple arms-length agreements using fair market-rate pricing, and Effingham Pellets' ownership of the production equipment, the two facilities are not considered to be under common control. The facilities do not meet all criteria to be considered as a single source, Effingham Pellets will be permitted independent of the Charles Ingram Lumber facility.

Since the proposed pellet manufacturing plant will be wholly located within the Charles Ingram Lumber property, the facilities will be treated as a single facility for purposes of any air dispersion modeling.

SOURCE TEST REQUIREMENTS

Source testing will be required to verify PM, PM₁₀, PM_{2.5}, VOC, acetaldehyde, acrolein, formaldehyde, methanol, phenol and propionaldehyde emission factors from the dry hammermill (DHM1) and the PelletBOX (PB1). An initial source test shall be conducted within 180 days of startup, with subsequent source tests shall be conducted annually. The source test will be used to verify emission rates in units of pounds per hour (lb/hr) and site-specific emission factors



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in pounds per oven-dried tons (lb/ODT). The facility may test emissions of VOCs as a surrogate to determine the total potential HAP emissions by applying the HAP ratios used in the application.

The facility PTE is less than Title V and PSD thresholds and is considered a true minor source. Because the facility is a true minor source and the VOC emissions are close to the Title V threshold the department will still require testing for all pollutants. The testing frequency for each pollutant after the initial source test may be reduced from annually to every three (3) years if the new emission factors are less than 85% of the initial emission factors for each pollutant and five (5) years if the new emission factor is 50% of the initial emission factor for each pollutant. If a subsequent source test indicates emission factors greater than 85% or 50% of initial factors, the facility will return to the next more frequent testing as follows: Five (5) year to three (3) year, three (3) year to annually.

EMISSION FACTORS

The emission factors used in this permit application to account for VOC and HAP emissions are largely based on those provided by Enviva Greenwood in their most recent construction permit application (see Statement of Basis for 1240-0113-CC). These factors were determined using the results of source tests conducted at the facility by Enviva or its previous owner, Colombo, or the results of source tests at similar facilities. Emission factors for PM, PM₁₀. And PM_{2.5} are either taken from AP-42 or calculated using vendor specifications. The following table lists the emission factors provided and their basis:

Emission Factors							
Emission Unit ID	Source Description	Pollutant	Emission Factor	Units	Controlled/Uncontrolled	Supporting Justification	
DSHS/ PHS/ SILO1	Dry Shavings Handling and Storage	PM	1.17E-03	lb/ODT	Uncontrolled	AP-42 13.4.2 Mass Transfer Equation	
		PM ₁₀	5.54E-04	lb/ODT	Uncontrolled		
		PM _{2.5}	8.39E-05	lb/ODT	Uncontrolled		
			VOC	1.42E-02	lb/ODT	Uncontrolled	Based on Greenwood (Colombo) bag sampling data with 20% contingency
			Acetaldehyde	1.42E-05	lb/ODT	Uncontrolled	Engineering estimate, assuming acetaldehyde = 0.1% of VOC
			Acrolein	1.42E-04	lb/ODT	Uncontrolled	Engineering estimate, assuming acrolein = 1% of VOC
			Formaldehyde	8.40E-04	lb/ODT	Uncontrolled	Calculated from NCASI's Wood Products Database (February 2013) for dry wood handling operations at an OSB mill. The emission factors were then converted from lb/MSF (3/8") to lb/ODT using the density and moisture content of an OSB panel.
			Methanol	2.03E-03	lb/ODT	Uncontrolled	
			Phenol	1.42E-05	lb/ODT	Uncontrolled	
	Propionaldehyde	1.42E-04	lb/ODT	Uncontrolled	Engineering estimate, assuming propionaldehyde = 1% of VOC		
DHM1	PelletBOX No. 1 - Dry	PM	4.40E-03	gr/dscf	Uncontrolled	Equipment vendor specifications	
		PM ₁₀	4.40E-03	gr/dscf	Uncontrolled	Equipment vendor specifications & Engineering assumption	
		PM _{2.5}	4.40E-03	gr/dscf	Uncontrolled		



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Emission Unit ID	Source Description	Pollutant	Emission Factor	Units	Controlled/Uncontrolled	Supporting Justification
	Hammer Mill	VOC	1.23	lb/ODT	Uncontrolled	Based on stack test results at multiple Enviva plants with contingency added
		Acetaldehyde	7.20E-03	lb/ODT	Uncontrolled	Enviva Greenwood stack testing did not measure detectable levels of pollutant. Factor based on test results from other Enviva facilities with contingency added
		Acrolein	1.08E-02	lb/ODT	Uncontrolled	
		Formaldehyde	2.40E-04	lb/ODT	Uncontrolled	Based on 2018 Enviva Greenwood stack test results with contingency added
		Methanol	5.88E-03	lb/ODT	Uncontrolled	
		Phenol	2.76E-03	lb/ODT	Uncontrolled	Engineering judgement
		Propionaldehyde	1.24E-02	lb/ODT	Uncontrolled	Based on 2017 Greenwood (Colombo) stack test results with contingency
PB1	PelletBOX No.1 – Pellet Mill and Pellet Cooler	PM	2.20E-02	gr/dscf	Uncontrolled	Equipment vendor specifications
		PM ₁₀	5.72E-03	gr/dscf	Uncontrolled	Equipment vendor specifications & Engineering assumption (PM ₁₀ = 26% of PM)
		PM _{2.5}	1.52E-02	lb/ODT	Uncontrolled	Based on 2019 Enviva Greenwood stack test results with contingency added
		VOC	2.97	lb/ODT	Uncontrolled	
		Acetaldehyde	3.36E-02	lb/ODT	Uncontrolled	
		Acrolein	4.99E-02	lb/ODT	Uncontrolled	Based on 2017 Greenwood (Colombo) and 2013 Enviva Wiggins stack test results with contingency added
		Formaldehyde	0.13	lb/ODT	Uncontrolled	Based on 2019 Enviva Greenwood stack test results with contingency added
		Methanol	5.98E-03	lb/ODT	Uncontrolled	
		Phenol	2.52E-02	lb/ODT	Uncontrolled	Enviva Greenwood stack testing did not measure detectable levels of pollutant. Factor based on test results from other Enviva facilities with contingency added
Propionaldehyde	1.46E-02	lb/ODT	Uncontrolled	Based on 2017 Greenwood (Colombo) and 2013 Enviva Wiggins stack test results with contingency added		
PHS/ SILO1	Pellet Handling and Storage/ Pellet Storage Silo	PM	1.17E-03	lb/ODT	Uncontrolled	AP-42 13.4.2 Mass Transfer Equation
		PM ₁₀	5.54E-04	lb/ODT	Uncontrolled	
		PM _{2.5}	8.39E-05	lb/ODT	Uncontrolled	
		CO	7.6E-03	lb/hr	Uncontrolled	Based on worst-case measurements from Enviva Greenwood
		VOC	1.42E-02	lb/ODT	Uncontrolled	Based on Greenwood (Colombo) bag sampling data with 20% contingency



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Emission Factors						
Emission Unit ID	Source Description	Pollutant	Emission Factor	Units	Controlled/Uncontrolled	Supporting Justification
		Acetaldehyde	1.42E-05	lb/ODT	Uncontrolled	Engineering estimate, assuming acetaldehyde = 0.1% of VOC
		Acrolein	1.42E-04	lb/ODT	Uncontrolled	Engineering estimate, assuming acrolein = 1% of VOC
		Formaldehyde	8.40E-04	lb/ODT	Uncontrolled	Calculated from NCASI's Wood Products Database (February 2013) for dry wood handling operations at an OSB mill. The emission factors were then converted from lb/MSF (3/8") to lb/ODT using the density and moisture content of an OSB panel.
		Methanol	2.03E-03	lb/ODT	Uncontrolled	
		Phenol	1.42E-05	lb/ODT	Uncontrolled	Engineering estimate, assuming phenol = 0.1% of VOC
		Propionaldehyde	1.42E-04	lb/ODT	Uncontrolled	Engineering estimate, assuming propionaldehyde = 1% of VOC

SPECIAL CONDITIONS

Wood Pellet Facilities can be a source of fugitive dust. The facility will be required to develop an Operation and Maintenance Plan which must include the following:

1. A schedule for the proper maintenance, operation, calibration of monitoring, recording, computer controllers, and associated devices to ensure proper process rate/process throughput, proper process control, and proper reporting.
2. Logs containing scheduled repairs and maintenance performed to ensure proper operation.
3. Methods to ensure proper operating speed, production rate, product moisture content, air flow, etc. to ensure emissions are minimized.
4. Methods to ensure the equipment is operating in accordance with manufacturer specifications.
5. Methods for minimizing fugitive emissions through proper maintenance procedures.
6. Methods for minimizing emissions during startup, shutdown, and malfunctions.
7. Inspection checks of collection hoppers and conveying systems for damaged or worn parts or other interferences with proper operation.

The facility will also be required to develop and implement a Best Management Practices Plan for dust control which must include the following:

1. Dust control methods for roadways and truck operations.
2. Designated dust control methods for each specific material handled. Frequency of control should be included where appropriate.
3. A maintenance schedule for all dust control equipment as well as a minimum inventory of spare parts.
4. Written procedures for all dust control equipment and systems. These procedures shall be based on the manufacturer's recommendations when available, at a minimum.
5. Training plans for dust control methods, equipment, and systems.



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6. Modifications and/or contingency plans required for changing weather conditions, failure of equipment, electrical power failure, and any other factors that may influence the effectiveness of control methods.
7. Steps to mitigate fugitive particulate matter to go beyond property boundaries.
8. Method to document plan requirement execution.
9. Schedule for the periodic review and update of the plan.

PROJECT EMISSIONS						
Pollutant	Uncontrolled		Controlled		PTE	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Dry Shavings and Handling Storage (DSHS)						
PM	0.0122	0.0534	--	--	0.0122	0.0534
PM ₁₀	5.8E-03	0.0253	--	--	5.8E-03	0.0253
PM _{2.5}	9.0E-04	3.8E-03	--	--	9.0E-04	3.8E-03
VOC	0.0739	0.3239	--	--	0.0739	0.3239
Acetaldehyde	7.4E-05	3.2E-04	--	--	7.4E-05	3.2E-04
Acrolein	7.4E-04	3.2E-03	--	--	7.4E-04	3.2E-03
Formaldehyde	4.4E-03	0.0192	--	--	4.4E-03	0.0192
Methanol	0.0106	0.0463	--	--	0.0106	0.0463
Phenol	7.4E-05	3.2E-04	--	--	7.4E-05	3.2E-04
Propionaldehyde	7.4E-04	3.2E-03	--	--	7.4E-04	3.2E-03
Total HAP	0.0166	0.0726	--	--	0.0166	0.0726
Dry Hammermill (DHM1)						
PM	0.1568	0.6867	--	--	0.1568	0.6867
PM ₁₀	0.1568	0.6867	--	--	0.1568	0.6867
PM _{2.5}	0.1568	0.6867	--	--	0.1568	0.6867
VOC	6.4045	28.052	--	--	6.4045	28.052
Acetaldehyde	0.0375	0.1642	--	--	0.0375	0.1642
Acrolein	0.0562	0.2463	--	--	0.0562	0.2463
Formaldehyde	1.2E-03	5.5E-03	--	--	1.2E-03	5.5E-03
Methanol	0.0306	0.1341	--	--	0.0306	0.1341
Phenol	0.0144	0.0629	--	--	0.0144	0.0629
Propionaldehyde	0.0646	0.2828	--	--	0.0646	0.2828
Total HAP	0.2045	0.8958	--	--	0.2045	0.8958
Pellet Mill and Pellet Cooler (PB1)						
PM	1.0832	4.7445	--	--	1.0832	4.7445
PM ₁₀	0.2816	1.2336	--	--	0.2816	1.2336
PM _{2.5}	0.0791	0.3467	--	--	0.0791	0.3467
VOC	15.465	67.735	--	--	15.465	67.735
Acetaldehyde	0.1750	0.7663	--	--	0.1750	0.7663
Acrolein	0.2598	1.1380	--	--	0.2598	1.1380
Formaldehyde	0.6769	2.9648	--	--	0.6769	2.9648
Methanol	0.0311	0.1364	--	--	0.0311	0.1364
Phenol	0.1312	0.5747	--	--	0.1312	0.5747



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PROJECT EMISSIONS

Pollutant	Uncontrolled		Controlled		PTE	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Propionaldehyde	0.0760	0.3330	--	--	0.0760	0.3330
Total HAP	1.3501	5.9133	--	--	1.3501	5.9133
Pellet Storage and Handling (PHS, SILO1)						
PM	0.0122	0.0534	--	--	0.0122	0.0534
PM ₁₀	5.8E-03	0.0253	--	--	5.8E-03	0.0253
PM _{2.5}	9.0E-04	3.8E-03	--	--	9.0E-04	3.8E-03
CO	7.6E-03	0.0333	--	--	7.6E-03	0.0333
VOC	0.0739	0.3239	--	--	0.0739	0.3239
Acetaldehyde	7.4E-05	3.2E-04	--	--	7.4E-05	3.2E-04
Acrolein	7.4E-04	3.2E-03	--	--	7.4E-04	3.2E-03
Formaldehyde	4.4E-03	0.0192	--	--	4.4E-03	0.0192
Methanol	0.0106	0.0463	--	--	0.0106	0.0463
Phenol	7.4E-05	3.2E-04	--	--	7.4E-05	3.2E-04
Propionaldehyde	7.4E-04	3.2E-03	--	--	7.4E-04	3.2E-03
Total HAP	0.0166	0.0726	--	--	0.0166	0.0726
Road Fugitives						
PM	0.0687	0.3008	--	--	0.0687	0.3008
PM ₁₀	0.0400	0.1750	--	--	0.0400	0.1750
PM _{2.5}	5.7E-03	0.0249	--	--	5.7E-03	0.0249
Facility Wide						
PM	1.33	5.84	--	--	1.33	5.84
PM ₁₀	0.49	2.15	--	--	0.49	2.15
PM _{2.5}	0.24	1.07	--	--	0.24	1.07
VOC	22.02	96.43	--	--	22.02	96.43
Acetaldehyde	0.21	0.93	--	--	0.21	0.93
Acrolein	0.32	1.38	--	--	0.32	1.38
Formaldehyde	0.69	3.01	--	--	0.69	3.01
Methanol	0.08	0.36	--	--	0.08	0.36
Phenol	0.15	0.64	--	--	0.15	0.64
Propionaldehyde	0.14	0.62	--	--	0.14	0.62
Total HAP	1.58	6.94	--	--	1.58	6.94

FACILITY WIDE EMISSIONS

Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
PM	5.84	--	5.84
PM ₁₀	2.15	--	2.15
PM _{2.5}	1.07	--	1.07
CO	0.01	--	0.03
VOC	96.43	--	96.43



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FACILITY WIDE EMISSIONS			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
Acetaldehyde	0.93	--	0.93
Acrolein	1.39	--	1.39
Formaldehyde	3.01	--	3.01
Methanol	0.36	--	0.36
Phenol	0.64	--	0.64
Propionaldehyde	0.62	--	0.62
Total HAP	6.95	--	6.95

OPERATING PERMIT STATUS

The facility does not currently have an operating permit but will be issued a State Operating Permit upon completion of this project

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Section II(E) – Synthetic Minor	Not applicable. This facility will be a true minor source and has not requested any federally enforceable limits for this project.
Standard No. 1	Not applicable. This project does not include any fuel burning operations.
Standard No. 3 (state only)	Not applicable. This project does not include waste combustion or reduction sources.
Standard No. 4	Applicable. The facility is subject to opacity and PM limits for PBFS, DHM1, PB1, and PS1. Visible emissions from each source must not exhibit an opacity greater than 20%. See table below for details.
Standard No. 5	Not applicable. The facility does not utilize any of the regulated processes specified in this regulation.
Standard No. 5.2	Not applicable. The project does not include any source that has the potential to emit nitrogen oxides from fuel combustion.
Standard No. 7	Not applicable. The PTE for all emissions are below major source thresholds.
61-62.6	Applicable. Facility is subject to statewide requirements.
40 CFR 60 and 61-62.60	Not applicable. This project does not include any sources subject to this standard.
40 CFR 61 and 61-62.61	Not applicable. This project does not include any source subject to this standard.
40 CFR 63 and 61-62.63	Not applicable. Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products – Not applicable: The facility is not a major source of HAP emissions. Furthermore, this subpart applies to facilities that manufacture plywood and/or composite wood products by bonding wood material or agricultural fibers using resin under heat and pressure to form a structural panel or engineered wood. The process used by the facility does not



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REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
	utilize resins. Instead, it uses lignin, which are naturally occurring in wood and are released during the pelletization process. There are no Area Source MACTs that the facility is subject to at this time.
61-62.68	Not applicable. The facility does not use any chemical subject to this regulation above threshold quantities.
40 CFR 64 (CAM)	Not applicable. Not a Title V facility.

Standard No. 4 Allowable					
Process	Process Weight Rate (tons/hr)	PM Allowable (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
Pelletizing Operations (PBFS, DHM1, PB1, PS1)	5.51	12.86	1.33	--	Daily Pressure Drop Readings (BF01) Weekly Maintenance Checks (BF01, CYC1)

AMBIENT AIR STANDARDS REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Standard No. 2	Not applicable. The facility only emits two of criteria pollutants, PM ₁₀ and PM _{2.5} , both with emission rates below the exemption threshold. Therefore, there is no requirement to model these emissions to demonstrate compliance. However, the Department completed modeling for PM ₁₀ and PM _{2.5} to address a public comment. See modeling summary dated 7/22/21.
Standard No. 7.c	Not applicable. Not a PSD project.
Standard No. 8 (state only)	Applicable. The facility has demonstrated compliance through modeling. See summary dated 7/22/21.

PUBLIC NOTICE

This construction permit underwent a 30-day public notice period, in accordance with SC Regulation 61-62.1, Section II(N), to address increased public concern regarding wood pellet facilities. The comment period was open from May 17, 2021 to July 1, 2021 and was placed on the BAQ website during that time period. Comments were received during the comment period.

ADDITIONAL PUBLIC PARTICIPATION

A virtual public hearing was held on June 17, 2021.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.