

**INFORMATION RELATIVE TO
THE DRAFT TITLE V OPERATING PERMIT
December 9, 2024**

GENERAL FACILITY INFORMATION

Facility Name: Hankins Inc

Facility Address:

15881 Highway 4 East
08/25/Ripley, MS 38663

County: Tippah

SIC Code(s): 2421

NAICS Code(s): 321113

APPLICATION SUMMARY

Permit No.: 2620-00005

NSPS (Part 60): JJJJ

Permit Action: Renewal

NESHAP (Part 61): N/A

Permit Folder: PER20230001

NESHAP (Part 63): DDDD, ZZZZ

Application Receipt Date: 08/25/2023

112(r) / RMP: N/A

Application Deemed Complete: 11/22/2024

Other: N/A

CBI Submitted?: No

FACILITY DESCRIPTION

Hankins, Inc. (i.e. “Hankins”) is an existing industrial facility that manufactures dried dimensional lumber from harvested southern yellow pine timber. Facility operations fall under SIC Code 2421 (Sawmills and Planing Mills).

Incoming pine logs are brought to the site by truck, weighed, and stored in the log storage area. Then, the logs are sawed to length (Emission Point AA-001) and debarked (AA-002) in the sawmill area. The green lumber is dried into three (3) direct-fired (natural gas and wood waste) lumber drying kilns (AA-010, AA-040, and AA-050). The dried rough lumber is finished in the planer mill (AA-030).

TITLE V SOURCE APPLICABILITY

The facility’s potential-to-emit (PTE) exceeds the Title V major source threshold of 100 tons per year (tpy) for each of the following criteria air pollutants: Nitrogen Oxides (NO_x), Carbon Monoxide (CO), Particulate Matter less than 10 microns (PM₁₀), Particulate Matter less than 2.5 microns (PM_{2.5}), and Volatile Organic Compounds (VOCs). The facility’s potential-to-emit hazardous air pollutants (HAPs) exceeds the Title V major source thresholds of 25 tpy of total HAPs and 10 tpy for the following individual HAPs – methanol.

Facility-Wide Potential-to-Emit Summary¹

Pollutant	PTE Emissions (tons/yr)
Particulate Matter (TSP)	212.24
PM ₁₀	192.57
PM _{2.5}	159.86
Sulfur Dioxide (SO ₂)	9.86
Nitrogen Oxides (NO _x)	193.33
Carbon Monoxide (CO)	236.67
Volatile Organic Compounds (VOC)	371.63
Total Reduced Sulfur (TRS)	-
Lead	0.02
CFC/HCFC	-
Total HAP	29.6

¹ The PTE emissions reflect any emission limits or enforceable restrictions included in the proposed permit.

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) APPLICABILITY

The facility is not one of the 28 categorical facilities listed in 40 CFR 52.21(b)(1)(i)(a); therefore, the PSD threshold for a major source is 250 tpy. The facility has the potential to emit more than 250 tons per year of VOCs; therefore, the facility is considered a major stationary source. This permitting action will not change the current PSD status of the facility.

FACILITY MODIFICATIONS AND/OR PERMIT CHANGES

The facility applied for a re-issuance of the Title V Operating Permit (TVOP) without proposed changes to the permit requirements and equipment since the permit's last modification on January 4, 2022.

COMPLIANCE ASSURANCE MONITORING (CAM) APPLICABILITY

40 CFR Part 64 specifies the requirements for CAM. The general applicability of this rule can be found in 40 CFR 64.2 and requires a Title V source to comply with the CAM requirements if all three of the following criteria are met for a pollutant-specific emission unit (PSEU):

1. The unit is subject to an emission limitation or standard for a regulated air pollutant other than exemptions under 40 CFR 64.2(b)(1);
2. The unit uses a control device to comply with the standard; and
3. The unit has pre-control emissions exceeding Title V major source threshold.

The facility's cyclones (AA-011, AA-021, AA-031, AA-041, and AA-051) are considered inherent to the process and not pollution control equipment. Therefore, there is no control

equipment associated with any emission units subject to an emission limit or standard at this facility, so Compliance Assurance Monitoring does not apply.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) APPLICABILITY

40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

This subpart regulates any facility that manufactures plywood and composite wood products (which includes kiln-dried lumber) and is a major source of hazardous air pollutant (HAP) emissions. Hankins is classified as a major source of HAPs and operates three (3) lumber drying kilns, so Subpart DDDD is applicable. However, the only requirement for lumber kilns is the submittal of an initial notification (which was satisfied with the submittal of a permit application).

40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines

The provisions of Subpart ZZZZ are applicable to reciprocating internal combustion engines (RICE). The facility is a major source of HAPs and it operates an emergency engine (AA-052) that commenced construction on or after June 12, 2006. The unit is considered a ‘new’ stationary RICE and it will comply with Subpart ZZZZ by complying with the requirements in 40 CFR Part JJJJ. No further requirements apply under Subpart ZZZZ.

NEW SOURCE PERFORMANCE STANDARDS (NSPS) APPLICABILITY

40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units

Hankins operates three (3) direct-fired lumber kilns. Since the kilns utilize burners, which are not steam-generating units, this subpart is not be applicable.

40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

This subpart applies to any tank with a capacity greater than 75 cubic meters (19,813 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kilopascals (kPa). While the facility operates several fuel storage tanks, their capacities are below the noted threshold. Therefore, Subpart Kb is not applicable.

40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The provisions of Subpart JJJJ apply to stationary spark ignition (SI) internal combustion engines (ICE). The facility operates a natural gas-fired emergency generator engine (AA-052) that is manufactured after July 1, 2008. The engine must be certified to comply with the emission standards in 40 CFR 60.4233.

SPECIFIC APPLICABLE REQUIREMENTS

Emission Point No.	Pollutant	Draft Permit Emission Limits	Monitoring Requirements
AA-000 (Facility-Wide)	PM	$E = 4.1 (p^{0.67})$	Conduct visible emission observations / evaluations once every two weeks on each cyclone (AA-011, AA-021, AA-031, AA-041, and AA-051)
AA-010 AA-040 AA-050 (Lumber Kilns)	VOCs	4.32 lbs./MBF; and 339.0 tpy (For All Kilns Combined; Rolling 12-Month Total) (PSD Avoidance Limit)	Monitor lumber throughput and calculate VOCs Combust uncontaminated wood waste and natural gas in the kiln burner and monitor fuel usage
	Lumber Throughput	156,774.0 MBF/Year (For All Kilns Combined; Rolling 12-Month Total) (PSD Avoidance Limit)	Perform regular maintenance inspections on each kiln
	PM	$E = 0.8808 \cdot (I^{-0.1667})$	The combustion of natural gas ensures compliance with this limitation.
AA-052 (Emergency Engine)	NO _x + HC CO	Emission Standards in 40 CFR 60.4233; Subpart JJJJ	Purchase an engine certified to the emission standards.
	Operating Hours	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations	Monitor the hours of operation through a non-resettable hour meter (emergency and non-emergency)
	PM	0.6 lb./MMBTU	The combustion of natural gas ensures compliance with this limitation.