

**INFORMATION RELATIVE TO  
THE DRAFT TITLE V OPERATING PERMIT  
September 10, 2024**

GENERAL FACILITY INFORMATION

**Facility Name:** Brookhaven Pellets LLC

**Facility Address:**

912 WL Behan Road

Brookhaven, MS 39601

**County:** Lincoln

**SIC Code(s):** 2499

**NAICS Code(s):** 321999

APPLICATION SUMMARY

**Permit No.:** 1620-00057

**NSPS (Part 60):** N/A

**Permit Action:** Minor Modification

**NESHAP (Part 61):** N/A

**Permit Folder:** PER20240001

**NESHAP (Part 63):** N/A

**Application Receipt Date:** 08/14/2024

**112(r) / RMP:** N/A

**Application Deemed Complete:** 08/27/2024

**Other:** PSD Avoidance Limit

**CBI Submitted?:** No

FACILITY DESCRIPTION

Brookhaven Pellets, LLC is a new facility engaged in the production of wood pellets from dried wood. Facility operations fall under SIC Code 2499 – Wood Products, Not Elsewhere Classified and NAICS Code 321999 – All Other Miscellaneous Wood Product Manufacturing. The facility will receive shavings from a neighboring sawmill / dimensional lumber drying facility and the shavings will have been dried to a lower moisture content (as compared to green wood chips).

Facility operations include pre-dried raw material handling, two (2) dry hammermills, two (2) pelletizer / pellet cooler, a pellet storage silo, finished pellet truck loading, and a crop dryer system. Additionally, the two (2) dry hammermills are each routed to a baghouse, which are considered inherent to the process, and the two (2) pelletizer / pellet coolers are routed to high efficiency cyclones.

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: Volatile Organic Compounds (VOC).

The facility's potential-to-emit hazardous air pollutants (HAPs) does not exceed the major source threshold of 25 tpy of total HAPs and 10 tpy for any individual HAP. Therefore, the facility is considered an area source of HAPs.

**Facility-Wide Potential-to-Emit Summary<sup>1</sup>**

Pollutant	PTE Emissions (tons/yr)
Particulate Matter (TSP)	19.46
PM <sub>10</sub>	36.52
PM <sub>2.5</sub>	35.82
Sulfur Dioxide (SO <sub>2</sub> )	0.01
Nitrogen Oxides (NO <sub>x</sub> )	1.37
Carbon Monoxide (CO)	0.79
Volatile Organic Compounds (VOC)	245.0 <sup>1</sup>
Total Reduced Sulfur (TRS)	--
Lead	--
CFC/HCFC	--
Individual HAP	9.0 <sup>1</sup>
Total HAP	24.0 <sup>1</sup>

<sup>1</sup> 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 volatile organic compounds (VOCs) but will continue to limit facility-wide emissions of VOCs to 245.0 tpy; therefore, the facility is considered a moderate stationary source. This permitting action will not change the current PSD status of the facility.

**FACILITY MODIFICATIONS AND/OR PERMIT CHANGES**

Brookhaven Pellets, LLC has proposed a crop dryer system to reduce the moisture content of residuals that are above the required target moisture content for processing the residuals into pellets. The crop dryer system consists of a 2.2 MMBTU/hr propane burner, 47,500 acfm fan, and crop trailer.

**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.

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 – NESHAP for Plywood and Composite Wood Products:** The provisions of Subpart DDDD are applicable to any major source that produces “plywood” or an “engineered wood product” (i.e. products made with small wood elements bound together with resin). Brookhaven Pellets, LLC does not produce plywood or an engineered wood product; therefore, the provisions of Subpart DDDD are **not** applicable.

**NEW SOURCE PERFORMANCE STANDARDS (NSPS) APPLICABILITY**

**40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels:** The provisions of Subpart Kb are applicable to storage vessels greater than or equal to 75 cubic meters (m<sup>3</sup>) that are used to store volatile organic liquid (VOL) for which construction, reconstruction, or modification commenced after July 23, 1984. Brookhaven Pellets does not own a storage vessel used to store VOL; therefore, it is **not** subject to Subpart Kb.

**SPECIFIC APPLICABLE REQUIREMENTS**

Emission Point No.	Pollutant	Draft Permit Emission Limits	Monitoring Requirements
AA-100 (Facility-Wide)	Opacity	≤ 40%	Implement “ <i>Dust Management Plan</i> ” and perform weekly visible emission observations / evaluations
	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$	Perform weekly maintenance inspections Monitor daily the pressure drop across each baghouse
	HAPs	9.0 tpy (Individual) 24.0 tpy (Total) (Rolling 12-Month Totals)	One-time stack-testing for HAPs Routine stack-testing for VOCs Calculate the emission of applicable pollutants (monthly and rolling 12-month total)
	VOCs	245.0 tpy	Maintain records of the moisture content of the wood material used in pellet production Monitor the Total Throughout of Dried Woodchips and Total Production of Wood Pellets
AA-001 (Facility-Wide)	PM (filterable)	Operational Requirement	Evaluate Pressure System of Each Truck Dump