Introduction

On the above date, a comprehensive inspection was conducted at Smokey Mountain Lumber, Inc. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). Smokey Mountain Lumber, Inc., otherwise known as the facility, specializes in manufacturing a variety of wood molding for use in residential and commercial construction. Operation of this facility is granted under permit number 11-804-15 which was issued on September 8, 2015 and expires on September 30, 2023. The inspection was conducted by Alex Latta. The facility was represented by Gerald Wheeler. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Steel toed boots, a hard hat, safety vest, and safety glasses are recommended while in the woodworking area around operating equipment. Hearing Protection may be desired if machines are operating.

Permitted Equipment

- ES-1: One (1) woodworking operation with emissions controlled by one (1) baghouse (CD-1)

ES-1 was observed in operation during the inspection. No visible emissions were observed from the dust collection system. After the wood dust is collected from the dust collector, it is dropped into a truck that is parked in an enclosure. In response to a complaint investigation in June of 2022 where agency staff found that dust from the
process was leaving the property boundary, the facility has installed covers around the outlet of the dust collector to help minimize fugitive emissions. A large pile of dust was observed behind the truck during the inspection, but it is contained in the enclosure. This dust is considered a fugitive dust source from the wood waste, not part of the process. Small amounts of dust did leave the enclosure during the inspection but appeared to settle on the property and was an improvement on the previous visit that resulted from the complaint. Fugitive emissions were not observed leaving the site during the inspection. Since there have been concerns about fugitive dust from this facility, AB Air Quality Code 4.0540 “Particulates From Fugitive Dust Source Emissions” will be added to the permit during this renewal so that fugitive emissions rules are clearly spelled out in the permit.

Exempt Sources:
The following exempt equipment was observed during the inspection:

- Various wood finishing equipment, such as saws, when not connected to the dust collection system (Pneumafil baghouse) and/or not vented to the outdoor atmosphere.

Permit Conditions:
The following permit conditions were reviewed during this inspection:

- A.1 – The facility is required to operate according to AB Air Quality Code including but not limited to the following specified conditions and any other applicable Local, State, and Federal regulations.
- A.2 – The facility is required to operate the processes and equipment consistent with the application they submitted for the permit.
- A.3 – The facility is required to submit an application for any changes or alterations to processes and equipment to AB Air Quality Agency. Failure to do so could result in enforcement action.
• A.4 – This condition requires the permittee to notify the Agency in the event of a name or ownership change.

• A.5 – This condition requires the facility to obtain a new air permit prior to installing and operating sources of air emissions at a site or location not specified in the permit (relocation).

• A.6 – This permit does not absolve the facility of any liabilities related to any civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The facility shall be subject to enforcement action if the terms of the permit are violated.

• A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures.

• A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.

• A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.

• A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.

• A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up-to-date on fee payments. The facility last submitted their fee payment on October 4, 2023.

• A.12 – The facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility’s request was received by the Agency on May 22, 2023.
• A.13 – This permit may be suspended or revoked by the AB Air Quality Agency Board under certain conditions.

• A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.

• B.1 – The previous issue of this permit shall become void with the issuance of this current version.

• B.2 – This condition states the facility shall not allow particulate matter caused by working, sanding or finishing of wood to be discharged without adequate control devices. The facility captures PM emissions from the woodworking operation through the duct work which routes to the duct collector where the captured wood dust falls from the bottom of the baghouse into the bed of a truck parked underneath it for collection. The dust collection system appears to be adequately collecting dust from the various woodworking operations, and no visible emissions were observed.

• B.3 – This condition limits visible emissions from all sources to no more than 20 percent opacity when averaged over a six-minute period. The facility exhibited minor, infrequent opacity between 5% and 10% in the form of fugitive emissions but these dispersed before leaving the property boundary.

• B.4 – This condition states that the facility must submit annual reports to the Agency by February 15th of each year. The facility is submitting annual reports as required. The most recent annual report was received February 6, 2023 and contained all the required information. For 2022, the facility collected a total of 459,100 pounds of wood shavings and operated for 1995 hours.

Compliance History:

The facility does not have a history of recorded violations in the last ten (10) years.

Conclusion:
Based on the above information, Smokey Mountain Lumber, Inc. appears to be in compliance with applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature: [Signature] Date: 6/21/2023
Reviewer Signature: [Signature] Date: 9/15/2023
Director Signature: [Signature] Date: 9/19/2023