



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

Beverly Eaves Perdue  
Governor

B. Keith Overcash, P.E.  
Director

Dee Freeman  
Secretary

June 5, 2009

Mr. Jack Swanner  
General Manager  
T & S Hardwoods, Inc.  
P.O. Box 1004  
Sylva, NC 28779

CERTIFIED MAIL 7002 2410 0003 0262 3826

SUBJECT: Director's Call – Toxics Compliance Demonstration for Combustion Sources

Dear Mr. Swanner:

This letter is a notification that your facility is subject to a Director's Call pursuant to 15A NCAC 2Q .0712 ("Calls By the Director"). Under the Director's Call, this facility must submit a permit application demonstrating through dispersion modeling that emissions of toxic air pollutants (TAPs) from your facility (including combustion sources) will not cause an acceptable ambient level listed in 15A NCAC 2D .1104 to be exceeded beyond your property boundary.

In preparation for this Director's Call, the North Carolina Division of Air Quality (NC DAQ) modeled impacts of TAP emissions from combustion sources at facilities throughout the state using the Human Exposure Model (HEM-3). The HEM-3 is a screening model that estimates human health risks resulting from emissions of air pollutants. Where HEM-3 presented a human health risk of one-in-one-million or greater, NC DAQ further evaluated the potential ambient impacts of the TAP emissions using an AERMOD model consistent with 15A NCAC 2D .1100. This Director's Call applies to all facilities for which the AERMOD model showed that TAP emissions from the combustion sources have the potential to exceed one or more acceptable ambient levels (AALs) listed in 15A NCAC 2D .1104.

The Director's Call requires that your facility submit a permit application that includes air dispersion modeling consistent with the provisions of 15A NCAC 2D .1106. The Director's Call only applies to those TAPs that are emitted from your combustion sources. However, if affected TAPs can also be emitted from other, non-combustion sources at your facility, these emissions must also be included in the modeling. The TAPs that are not emitted from the combustion sources are not affected by this Director's Call.

The air dispersion modeling should be sufficient to demonstrate that the ambient concentrations of affected TAPs originating from your facility will not exceed the applicable AALs. The modeling shall be based on process, operational, and air pollution control equipment parameters and emission rates that are (or will be) contained in the facility's permit. Additional guidance on TAP emission modeling procedures in North Carolina is provided on our website (<http://daq.state.nc.us/permits/mets/Guidance.pdf>).

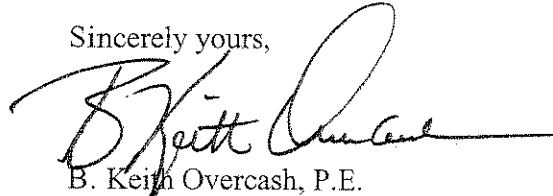
Mr. Swanner

June 5, 2009

Page 2

It is our understanding that the T&S Hardwoods facility in Sylva, NC has not been operating since May 2009. Please contact Ms. Fern Paterson, P.E. at (919) 715-6242 within 30 days of re-starting operations at this facility to establish a schedule for submitting the required modeling demonstration. In the meantime, please feel free to contact Ms. Paterson if you have any other questions with regards to this matter.

Sincerely yours,



B. Keith Overcash, P.E.  
Director

BKO:FAP

Enclosure

cc: Asheville Regional Office  
Michael Abraczinskas (Planning)  
Central Files