



TCEQ REGULATORY GUIDANCE

Small Business and Environmental Assistance Division

RG-430

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Environmental Rules for Sawmills

This guide provides a summary of the environmental requirements that apply to sawmills and the actions you need to take to operate your sawmill in compliance with state and federal laws. A sawmill is any facility that processes green wood by sawing, cutting, debarking, or planing.

This document is not a substitute for knowing the actual rules of the Texas Commission on Environmental Quality (TCEQ) or applicable federal laws or regulations. For free and confidential assistance, contact TCEQ's Small Business and Local Government Assistance (SBLGA) at 1-800-447-2827.

Several environmental rules apply to sawmills. These rules, designed to help protect air and water, determine how businesses must manage their wastes. In general, the basic steps to meeting your environmental obligations are:

- Apply for the required permits, such as a storm water discharge permit, a waste water permit, or an air permit by rule.
- Store, recycle, and dispose of all wastes so as to avoid spills or releases.
- Take the appropriate precautions and obtain the required registrations for any fuel tanks at your site.
- Use best management practices to ensure a clean and healthy sawmill for your employees and the environment.

Specifically, the environmental rules and permits for sawmills fall into four categories:

- air quality
- fuel tanks
- water quality
- solid waste

These rules and permits are summarized in the following pages.

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Air Quality Permits and Rules

Sawmills emit particulate matter (PM), in the form of wood dust, and volatile organic compounds (VOCs). These are pollutants, which affect air quality and public health. Because of this, sawmills are required by the TCEQ to meet certain emission and design standards.

You may have been in operation for many years and never had a permit. However, you may still be required to have a permit, and applying for one now could keep you out of an enforcement action in the future.

With regard to permits concerning air quality, your sawmill will fall under one of three main categories:

- It is so small that it qualifies as *de minimis*, in which case you do not need a permit.
- It **does not** perform any mechanical drying of lumber, in which case you will probably need one or more permits of the “permits by rule” variety.
- It **does** perform mechanical drying of green wood (kiln drying), in which case you will need what is called a “new source review” permit.

Don't be a nuisance!

You are not allowed to create emissions or conditions that prevent others from normal use and enjoyment of their property.

If you create a nuisance condition, neighbors may file a nuisance complaint, which can lead to an investigation.

In addition, your sawmill might be located in a nonattainment area, in which case additional permits might be required.

Also, any business classified as a “major source” of air pollution must comply with additional regulations and obtain a federal operating permit. In general, the emission threshold for becoming a major source of VOCs is 100 tons per year. If you think you might be a major source of air emissions, call 1-800-447-2827.

De Minimis: No Air Permit Required

The term “*de minimis*” is used to refer to activities that emit such minor amounts of air pollution that no state air authorization is required. If your sawmill qualifies as *de minimis*, you do not need to register with the TCEQ; you only need to keep records to prove that your facility is *de minimis*.

Very few sawmills are small enough to qualify as *de minimis*. If you think you might qualify as *de minimis*, call the Small Business and Local Government Assistance hotline at 1-800-447-2827 to find out what is required to demonstrate your *de minimis* status.

Permits by Rule

If no drying is done at your mill, you will probably qualify for a permit by rule, or PBR. PBRs provide air authorizations for sites that do not significantly contaminate the environment. PBRs authorize air emissions from specific types of processes, and have specific, non-negotiable conditions that you must meet.

The most common PBR required for sawmills is PBR 106.223. This permit may be used by sawmills that:

- process no more than 25 million board feet (green-lumber tally) per year, and
- perform no mechanical drying of lumber.

To qualify for PBR 106.223, sawmills must also:

- Be located at least 500 feet from any “sensitive receptors,” which includes neighbors and any person, place, or thing not on its premises but affected by its emissions. Examples include businesses, residences, recreation centers, boat ramps, bodies of water, recreational areas, schools, or other structures not used solely by the owner of the sawmill.
- Maintain in-plant roads and vehicle work areas to control dust emissions.
- Remove or contain sawmill waste (sawdust, shavings, chips, and bark) to minimize particulate emissions and storm water pollution.
- Move sawmill waste mechanically using belts and/or drag chains to a collection area. Pneumatic collection systems must include filtration.
- Dispose of sawmill waste in a manner that prevents airborne emissions. Burning is prohibited unless conducted in an approved incinerator.
- Prevent visible emissions at the property line.

To apply for PBR 106.223, you must register using TCEQ form PI-7 and receive written TCEQ approval before construction and operation. After the TCEQ receives the form, it takes approximately 45 days for approval.

However, PBR 106.223 only authorizes your milling operations, so you may also need authorizations for other activities you perform on-site. The following PBRs may cover your other activities:

- PBR 106.231—Manufacturing, Refinishing, and Restoring Wood Products
- PBR 106.265—Handheld and Manually Operated Machines
- PBR 106.412—Fuel Dispensing
- PBR 106.472—Organic and Inorganic Liquid Loading and Unloading
- PBR 106.473—Organic Liquid Loading and Unloading
- PBR 106.491—Dual-Chamber Incinerators

To fully comply with state regulations, your records must have a copy of each applicable PBR, and you must be able to demonstrate that your site complies with permit requirements and conditions.

New Source Review Permits

If you dry lumber in a kiln or otherwise cannot meet *de minimis* or PBR conditions, you are required to obtain a new source review, or NSR, permit. The NSR process includes a detailed application, air-dispersion modeling, a toxicology review, public notice of your permit request, and a lengthy review by TCEQ professional staff—taking up to a year to complete.

Mills in Nonattainment Areas

There are certain clusters of counties in Texas that don't meet minimum federal air quality standards. These regions are referred to as "nonattainment areas." Currently, the Dallas–Fort Worth, El Paso, Houston–Galveston, and Beaumont–Port Arthur areas all have nonattainment status. If your facility is located in one of these areas, additional control of VOCs and PM may be required, and you may also need a more comprehensive air authorization. Call 1-800-447-2827 for more information.

Fuel-Tank Registrations and Rules

If you refuel equipment or vehicles on-site, rules apply to your petroleum storage tank, or PST. All PSTs must be constructed and maintained so as to avoid spills. Significant spills or leaks may require reporting, and all spills and leaks must be cleaned up immediately. For more guidance on how to respond to fuel-tank leaks, call 1-800-447-2827 and request our publication *Leaking Storage Tanks: What Should I Do?* (RG-018).

Underground storage tanks (USTs) containing fuel or hazardous substances must be registered on TCEQ form 0724. Farm or residential tanks with a capacity of 1,100 gallons or less are exempt. Aboveground storage tanks (ASTs) with a capacity greater than 1,100 gallons, and containing fuel or hazardous substances, must be registered on TCEQ form 0659.

For more information about PST issues such as installing or removing tanks, or to obtain registration forms, contact the TCEQ's PST program at 512/239-2182. Additional information to help you determine if your tank is regulated is available in our publication *Am I Regulated?* (RG-042).

You may be required to have a Spill-Prevention Control and Countermeasure (SPCC) plan if you store gasoline or oil (petroleum, biodiesel, animal, or vegetable) in one of the following:

- containers (55 gallons or more) or tanks with a total storage capacity of 1,320 gallons, or
- underground storage tanks with storage capacity of 42,000 gallons.

For more information call the Environmental Protection Agency at 214/665-6489.

There may also be local restrictions, so you should also check with city officials and your local fire marshal.

Water Quality Permits and Rules

Sawmills are required to get permit coverage to discharge storm water in the state of Texas. Sawmills have three options regarding coverage for storm water discharges:

- ***No-Exposure Certification:*** All processing facilities, raw-material storage areas, and loading and unloading areas must be physically covered by storm-resistant shelters.
- ***Multi-Sector General Permit (MSGP):*** You must develop and implement a storm water pollution prevention plan (SWP3) and submit a Notice of Intent (NOI) form.
- ***Individual Permit:*** Sawmills that have unusual operations or use chemicals in their wet decking may need to apply for an individual permit.

Normally, the MSGP is the best option for sawmills. Tools to help you comply with this permit are available at www.sblga.info.

Sawmills that wet green timber with chemical additives or formulations must treat the waste water prior to discharge and obtain an individual industrial waste-water permit. Any other process water must be permitted and treated prior to discharge. Call 1-800-447-2827 for more information.

Solid-Waste Rules

Sawmills must categorize and dispose of their waste according to specific rules for industrial waste. The following publications can guide you in managing your wastes properly.

- *Classification and Coding of Industrial and Hazardous Waste* (RG-22)
- *Industrial and Hazardous Waste: Rules and Regulations for SQG* (RG-234)
- *Stop—You May Not Need to Fill Out Industrial and Hazardous Waste Forms* (RG-222)
- *Can I Recycle Some of My Industrial or Hazardous Wastes?* (RG-240)

The publications are available at www.tceq.com, or by calling 1-800-447-2827.

How can I make sure I run a clean sawmill?

There are a number of techniques that will help eliminate or reduce the wastes and emissions generated by your sawmill. These techniques are all part of what is called “best management practices,” or BMPs. BMPs are procedures that have been determined to be the most effective and practical methods of preventing or reducing the pollution generated by a particular type of activity, such as sawmilling. For a clean sawmill, adopt the following best management practices.

In general:

- Take all reasonable precautions to prevent wood dust (particulate matter) from becoming airborne.
- Handle, store, and dispose of waste in a manner that prevents or inhibits it from blowing off-site or otherwise creating a nuisance.
- Make every effort to prevent waste from reaching water. Also, prevent process water from combining with storm water.

More specifically:

- Mill only when the wind direction and wind speed minimizes your site’s impact on your neighbors.
- Maintain and keep all emission-control equipment in proper working condition and in use during milling activities.
- Cover sawmill waste with tarpaulins to reduce the amount of contaminated water runoff that leaves your site, and to help prevent wind from blowing the waste off-site.
- Contain and collect all visible floating solids that reach water.
- Remove sawmill waste from the site as soon as possible.
- Do not burn waste.
- Recycle sawmill waste in the form of mulch, or send it to an approved energy generator.

More questions?

Contact TCEQ’s Small Business and Local Government Assistance. Go to www.sblga.info and click on “Sawmills,” or call our hotline, 1-800-447-2827.