

STATEMENT OF BASIS

East Alabama Lumber Company, Inc. Lafayette, Chambers County, Alabama Facility/Permit No. 302-S003

This draft renewal Title V Major Source Operating Permit (MSOP) is proposed under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. The current MSOP was issued on October 14, 2009, with a modification issued February 9, 2012. The current MSOP expired November 8, 2014, but remains effective until issuance of the renewal based on General Proviso No. 2.

East Alabama Lumber Company operates a softwood sawmill in Lafayette, Alabama. The significant sources of air pollutants includes a 30 MMBtu/hr wood-fired suspension burner that provides direct heat to a 174 MBF dry kiln (Emission Unit No. 001) and a 35 MMBtu/hr wood-fired suspension burner that provides direct heat to a 174 MBF dry kiln (Emission Unit No. 002); a sawmill with a cyclone and two (2) chippers with two (2) cyclones (Emission Unit No. 003); and a planer mill with two (2) cyclones (Emission Unit No. 004). Insignificant emission sources at this facility include wet decking operations, parts washing, petroleum storage and unloading, and various debarking, sawing, and lumber storage operations. There have been no changes to any significant emission units since the issuance of the current MSOP.

Applicability: Federal Regulations

Title V

This facility is considered a major source under Title V regulations because potential emissions for particulate, carbon monoxide (CO), and volatile organic compounds (VOC) each exceed the 100 TPY major source threshold. It is considered a synthetic minor source of Hazardous Air Pollutants (HAP) due to a facility-wide throughput limit of 100 MMBF during any consecutive 12-month period, which serves to limit potential methanol emissions to less than 10 TPY and combined HAP emissions to less than 25 TPY.

Prevention of Significant Deterioration (PSD)

The facility is currently a minor source under PSD. It is located in an attainment area for all criteria pollutants, and the facility operations are not one of the 28 listed major source categories. Therefore, the major source threshold of concern is 250 TPY for criteria pollutants.

NSPS

The facility has no sources that are subject to the New Source Performance Standards (NSPS), as referenced in 40 CFR Part 60.

MACT

The facility is considered to be a synthetic minor source under MACT regulations due to a facility-wide throughput limit of 100 MMBF during any consecutive 12-month period, which serves to limit emissions of any single HAP to less than 10 TPY and emissions of any combination of HAP to less than 25 TPY.

Applicability: State Regulations

All point sources of particulate matter at the facility are subject to the particulate matter (as TSP) emission limitations of ADEM Admin. Code 335-3-4-.04(1) for Process Industries-General. The allowable emission rate for these processes is calculated using the following process weight equations:

$$E = 3.59P^{0.62} \quad (P < 30 \text{ tons per hour})$$

Or

$$E = 17.31P^{0.16} \quad (P \geq 30 \text{ tons per hour})$$

where E = Emissions in pounds per hour

P = Process weight in tons per hour

All sources of particulate emissions at the facility are subject to the State visible emission standard of 20% opacity, as determined by a six-minute average, with one six-minute period per hour not to exceed 40%, as referenced in ADEM Admin. Code R. 335-3-4-.01.

Emission Testing and Monitoring

001 – Dry Kiln No. 1 (174 MBF Lumber Dry Kiln with 30 MMBtu/hr Wood-Fired Burner)

002 – Dry Kiln No. 2 (174 MBF Lumber Dry Kiln with 35 MMBtu/hr Wood-Fired Burner)

Within ten days after the end of each month, compliance with the cumulative production limit for Emission Unit Nos. 001 and 002 would be determined and maintained on a monthly and 12-month rolling total basis. Emissions from the kiln vents are primarily condensed water vapor and VOC driven off from the drying lumber. Due to the nature of the emissions from the kilns,

emission testing and monitoring for the SIP visible emission and particulate standards is not considered practical or necessary.

003 – Sawmill Operations (Sawmill with a Cyclone and Two (2) Chippers with Two (2) Cyclones)

004 – Planer Mill Operations (Planer Mill with Two (2) Cyclones)

For compliance with the particulate and visible emission standards, emission monitoring for each cyclone would include:

- At least weekly during daylight hours, while the process is operating, the permittee shall visually observe the exhaust from each cyclone for the presence of greater than normal visible emissions as determined by previous observations.
- Whenever observed visible emissions are greater than normal, corrective action to reduce the visible emissions to normal shall be initiated as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that visible emissions were reduced to normal.
- The cyclones shall be inspected for proper operation and cleaned at least annually, but more frequently whenever greater than normal visible emissions are observed. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours from the completion of the inspection.

CAM

According to the application, there are no units at the facility that could be classified as active air pollution control devices, as the cyclones at the facility function as material separators and are considered inherent parts of the processes.

Recordkeeping and Reporting Requirements

The permittee would be required to maintain records of production for Emission Units 001 and 002 on a monthly and 12-month rolling total basis. The records would be kept on-site in a permanent form suitable for inspection and readily available for inspection for at least five (5) years from the date of generation of each record.

The permittee would be required to maintain records for the required emission monitoring of Emission Units 003 and 004 on-site in a permanent form suitable for inspection and readily available for inspection for at least five (5) years from the date of generation of each record. These records would include (as applicable):

- The date, time, and results of each emission observation;

- The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and
- The date(s) and time each control device was inspected for proper operation and, if the results of the inspection indicated that cleaning or emission-related maintenance was needed, the date(s), time, and nature of the cleaning/maintenance performed.

The permittee would be required to include the following information (as applicable) in the Semiannual Monitoring Report required by General Permit Proviso No. 21:

- The total kiln throughput for Emission Units 001 and 002 for each consecutive 12-month period during the reporting period;
- A statement as to whether all emission observations were completed as required during the reporting period, and if not, the date(s) and reasons(s) why the monitoring was not performed;
- A statement as to whether the annual inspections of the cyclones were accomplished during the reporting period, and if so, the date and results of the inspection; and
- The date(s), time, nature, and results of any corrective action taken when (1) a deviation from an emission monitoring parameter was observed or (2) an inspection of the cyclones indicated that cleaning or emission-related maintenance was needed.

Recommendation

Based on the above analysis, I recommend East Alabama Lumber Company's Major Source Operating Permit (302-S003) be renewed with the conditions noted above, pending the resolution of any comments received during the 30-day public comment period and 45-day EPA review period.

Rachael Broadway
Chemical Branch
Air Division

January 23, 2014
Date



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: EAST ALABAMA LUMBER COMPANY, INC.
FACILITY NAME: EAST ALABAMA LUMBER COMPANY, INC.
FACILITY/PERMIT NO.: 302-S003
LOCATION: LAFAYETTE, CHAMBERS COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code 1975, §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code 1975, §§22-22A-1 to 22-22A-15, (2006 Rplc. Vol. and 2007 Cum. Supp.) and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT
Effective Date: DRAFT
Expiration Date: DRAFT

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General Permit Provisos

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<p>1. <u>Transfer</u></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code R. 335-3-16-.13(1)(a)5.</p>	<p>ADEM Admin. Code R. 335-3-16-.02(6)</p>
<p>2. <u>Renewals</u></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	<p>ADEM Admin. Code R. 335-3-16-.12(2)</p>
<p>3. <u>Severability Clause</u></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(e)</p>
<p>4. <u>Compliance</u></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(f)</p> <p>ADEM Admin. Code R. 335-3-16-.05(g)</p>

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<p>5. <u>Termination for Cause</u></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(h)</p>
<p>6. <u>Property Rights</u></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(i)</p>
<p>7. <u>Submission of Information</u></p> <p>The permittee must submit to the Air Division, within 30 days or for such other reasonable time as the Air Division may set, any information that the Air Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Air Division copies of records required to be kept by this permit.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(j)</p>
<p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></p> <p>No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.</p>	<p>ADEM Admin. Code R. 335-3-16-.05(k)</p>
<p>9. <u>Certification of Truth, Accuracy, and Completeness</u></p> <p>Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.</p>	<p>ADEM Admin. Code R. 335-3-16-.07(a)</p>
<p>10. <u>Inspection and Entry</u></p> <p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:</p>	<p>ADEM Admin. Code R. 335-3-16-.07(b)</p>

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<p>(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</p> <p>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</p> <p>(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;</p> <p>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</p>	
<p>11. <u>Compliance Provisions</u></p> <p>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</p> <p>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</p>	<p>ADEM Admin. Code R. 335-3-16-.07(c)</p>
<p>12. <u>Compliance Certification</u></p> <p>The permittee shall submit a complete and accurate compliance certification by January 7th of each year for each annual reporting period of this permit (November 9th – November 8th).</p> <p>(a) The compliance certification shall include the following:</p> <p>(1) The identification of each term or condition of this permit that is the basis of the certification;</p> <p>(2) The compliance status;</p> <p>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-16-.05(c) (Monitoring and Record Keeping Requirements);</p> <p>(4) Whether compliance has been continuous or intermittent;</p>	<p>ADEM Admin. Code R. 335-3-16-.07(e)</p>

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<p>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p style="text-align: center;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="text-align: center;">and to:</p> <p style="text-align: center;">Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303</p> <p>13. Reopening for Cause</p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	<p>ADEM Admin. Code R. 335-3-16-.13(5)</p>

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<p><u>14. Additional Rules and Regulations</u></p> <p>This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.</p> <p><u>15. Equipment Maintenance or Breakdown</u></p> <p>(a) In case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Air Division at least (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:</p> <ol style="list-style-type: none">(1) Identification of the specific facility to be taken out of service as well as its location and permit number;(2) The expected length of time that the air pollution control equipment will be out of service;(3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period;(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;(5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period. <p>(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p> <p>ADEM Admin. Code R. 335-3-1-.07(1),(2)</p>

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<p>16. <u>Operation of Capture and Control Devices</u></p> <p>All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.</p> <p>17. <u>Obnoxious Odors</u></p> <p>This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.</p> <p>18. <u>Fugitive Dust</u></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(b) Plant or haul roads and grounds shall be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:</p> <ol style="list-style-type: none">(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;(3) By paving;(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions. <p>Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p> <p>ADEM Admin. Code R. 335-3-1-.08</p> <p>ADEM Admin. Code R. 335-3-4-.02</p>

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<p><u>19. Additions and Revisions</u></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	ADEM Admin. Code R. 335-3-16-.13 and 335-3-16-.14
<p><u>20. Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <ul style="list-style-type: none">(1) The date, place, and time of all sampling or measurements;(2) The date analyses were performed;(3) The company or entity that performed the analyses;(4) The analytical techniques or methods used;(5) The results of all analyses; and(6) The operating conditions that existed at the time of sampling or measurement. <p>(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.</p>	ADEM Admin. Code R. 335-3-16-.05(c)2.
<p><u>21. Reporting Requirements</u></p> <p>(a) Reports to the Air Division of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-16-.04(9).</p> <p>(b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p>	ADEM Admin. Code R. 335-3-16-.05(c)3.

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<p>22. <u>Emission Testing Requirements</u></p> <p>Each point of emission which requires testing shall be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department’s air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <ul style="list-style-type: none"> (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests. (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning). (c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity. (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances. <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p> <p>23. <u>Payment of Emission Fees</u></p> <ul style="list-style-type: none"> (a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code R. 335-1-7-.04 according to the schedule in ADEM Admin. Code R. 335-1-7-.05. 	<p>ADEM Admin. Code R. 335-3-1-.05(3) and 335-3-1-.04(1)</p> <p>ADEM Admin. Code R. 335-3-1-.04</p> <p>ADEM Admin. Code R. 335-3-1-.04</p>

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<p>(b) The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code R. 335-1-7-.05.</p>	ADEM Admin. Code R. 335-1-7-.05
<p>24. Other Reporting and Testing Requirements</p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	ADEM Admin. Code R. 335-3-1-.04(1)
<p>25. Title VI Requirements (Refrigerants)</p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR § 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR § 82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	ADEM Admin. Code R. 335-3-16-.05(a)
<p>26. Chemical Accidental Prevention Provisions</p> <p>If a chemical listed in Table 1 of 40 CFR § 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <ol style="list-style-type: none">(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a) or,(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	40 CFR Part 68

General Permit Provisos

Federally Enforceable Provisos	Regulations
<p><u>27. Display of Permit</u></p> <p>This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.</p>	<p>ADEM Admin. Code R. 335-3-14-.01(1)(d)</p>
<p><u>28. Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>ADEM Admin. Code R. 335-3-1-.10</p>
<p><u>29. Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>ADEM Admin. Code R. 335-3-4-.01(1)</p>
<p><u>30. Fuel-Burning Equipment</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-5-.01.</p>	<p>ADEM Admin. Code R. 335-3-4-.03</p> <p>ADEM Admin. Code R. 335-3-5-.01</p>
<p><u>31. Process Industries – General</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code R. 335-3-4-.04.</p>	<p>ADEM Admin. Code R. 335-3-4-.04</p>
<p><u>32. Averaging Time for Emission Limits</u></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>ADEM Admin. Code R. 335-3-1-.05</p>

General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>33. <u>Open Burning</u></p> <p>Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.</p>	<p>ADEM Admin. Code R. 335-3-3-.01</p>

Emission Unit No. 001 (Dry Kiln No. 1)

Summary Page

Description: 174 MBF Direct-Fired Lumber Dry Kiln with a 30 MMBtu/hr Wood-Fired Burner

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DK-1	Dry Kiln No. 1 Roof Vents	PM	$E = 3.59(P)^{0.62}$ for $P < 30$ TPH Or $E = 17.31(P)^{0.16}$ for $P \geq 30$ TPH	ADEM Admin. Code r. 335-3-4-.04
		HAP	Production Limit: 100,000 MBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-15-.01(h)

Emission Unit No. 001 (Dry Kiln No. 1)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to a synthetic minor emission limit to restrict its potential to emit below the major source threshold established at ADEM Admin. Code r. 335-3-11-.06, "National Emission Standards for Hazardous Air Pollutants for Source Categories."</p> <p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or permit the emission of particulate matter in any one hour from each of these units in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p>Or</p> $E = 17.31 P^{0.16} \quad (P \geq 30 \text{ TPH})$ <p>where E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow the combined production from Dry Kiln Nos. 1 and 2 to exceed 100,000 MBF during any consecutive 12-month period.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate from this unit shall be determined in accordance with Method 5 at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p> <p>(b) If testing is required, the volatile organic compound emission rate shall be determined in accordance with Method 25A at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-15-.01(h)</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin Code r. 335-3-15-.01(h)</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>(c) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>
<p>4. <u>Emission Monitoring</u></p> <p>Within 10 days after the end of each calendar month, the permittee shall calculate the combined production for Dry Kiln Nos. 1 and 2 for the preceding month and 12-month period and shall determine compliance with the combined production limit for Dry Kiln Nos. 1 and 2 for the preceding 12-month period.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The permittee shall maintain records of production from Lumber Dry Kiln Nos. 1 and 2 on a monthly and 12-month rolling total basis in a permanent form suitable for inspection. The records shall be retained for a period of five (5) years from the date of generation of each record and be made available upon request.</p> <p>(b) Should the cumulative production limit be exceeded during any consecutive 12-month period, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.</p> <p>(c) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the total kiln throughput for each consecutive 12-month period during the reporting period for Lumber Dry Kiln Nos. 1 and 2.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Emission Unit No. 002 (Dry Kiln No. 2)

Summary Page

Description: 174 MBF Direct-Fired Lumber Dry Kiln with a 35 MMBtu/hr Wood-Fired Burner

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DK-2	Dry Kiln No. 2 Roof Vents	PM	$E = 3.59(P)^{0.62}$ for $P < 30$ TPH Or $E = 17.31(P)^{0.16}$ for $P \geq 30$ TPH	ADEM Admin. Code r. 335-3-4-.04
		HAP	Production Limit: 100,000 MBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-15-.01(h)

Emission Unit No. 002 (Dry Kiln No. 2)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to a synthetic minor emission limit to restrict its potential to emit below the major source threshold established at ADEM Admin. Code R. 335-3-11-.06, "National Emission Standards for Hazardous Air Pollutants for Source Categories."</p> <p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or permit the emission of particulate matter in any one hour from this unit in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p>Or</p> $E = 17.31 P^{0.16} \quad (P \geq 30 \text{ TPH})$ <p>where E = Emissions in pounds per hour P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow the combined production from Dry Kiln Nos. 1 and 2 to exceed 100,000 MBF during any consecutive 12-month period.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate from this unit shall be determined in accordance with Method 5 at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p> <p>(b) If testing is required, the volatile organic compound emission rate shall be determined in accordance with Method 25A at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-15-.01(h)</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin Code r. 335-3-15-.01(h)</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>(c) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>
<p>4. <u>Emission Monitoring</u></p> <p>Within 10 days after the end of each calendar month, the permittee shall calculate the combined production for Lumber Dry Kiln Nos. 1 and 2 for the preceding month and 12-month period and shall determine compliance with the combined production limit for Lumber Dry Kiln Nos. 1 and 2 for the preceding 12-month period.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The permittee shall maintain records of production from Lumber Dry Kiln Nos. 1 and 2 on a monthly and 12-month rolling total basis in a permanent form suitable for inspection. The records shall be retained for a period of five (5) years from the date of generation of each record and be made available upon request.</p> <p>(b) Should the cumulative production limit be exceeded during any consecutive 12-month period, the permittee shall notify the Air Division shall be notified in writing within two (2) working days of determining that the exceedance occurred.</p> <p>(c) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the total kiln throughput for each consecutive 12-month period during the reporting period for Lumber Dry Kiln Nos. 1 and 2.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

**Emission Unit No. 003 (Sawmill Operations)
Summary Page**

Description: Sawmill with a Cyclone and Two (2) Chippers with Two (2) Cyclones

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
C-1	Sawmill Cyclone	PM	E = 3.59(P) ^{0.62} for P<30 TPH	ADEM Admin. Code r. 335-3-4-.04
C-2	Chipper Cyclone No. 1		Or	
C-3	Chipper Cyclone No. 2		E = 17.31(P) ^{0.16} for P≥30 TPH	

Emission Unit No. 003 (Sawmill Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p>
<p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or permit the emission of particulate matter in any one hour from each of these units in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p>Or</p> $E = 17.31 P^{0.16} \quad (P \geq 30 \text{ TPH})$ <p>where E = Emissions in pounds per hour P = Process weight in tons per hour</p>	<p>ADEM Admin. Code r. 335-3-4-.04</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate from this unit shall be determined in accordance with Method 5 at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p> <p>(b) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>
<p>4. <u>Emission Monitoring</u></p> <p>(a) At least once per week during daylight hours while the process is operating, permittee personnel familiar with the process shall observe the cyclones for greater than normal visible emissions as determined by previous observations of normal operations.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(b) Whenever observed visible emissions are greater than normal, corrective action shall be initiated as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.</p> <p>(c) The cyclones shall be inspected for proper operation and cleaned at least annually, but more frequently whenever observed visible emissions are greater than normal. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours from the completion of the inspection.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) The permittee shall maintain records of emission monitoring performed in a permanent form on-site and available for inspection for at least five (5) years from the date of generation of each record. These records shall include:</p> <ul style="list-style-type: none"> (i) The date, time, and results of each weekly observation for greater than normal visible emissions; (ii) The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed; (iii) The date(s) and time the cyclones were inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed. 	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the following information for this emission unit:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(i) A statement as to whether all observations for greater than normal visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;</p> <p>(ii) A statement as to whether the annual inspection of the cyclones were accomplished during the reporting period, and if so, the date and results of the inspection;</p> <p>(iii) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed or (2) an inspection of the cyclones indicated that cleaning or emissions-related maintenance was needed.</p>	

Emission Unit No. 004 (Planer Mill Operations)

Summary Page

Description: Planer Mill with Two (2) Cyclones

Permitted Operating Schedule: $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
C-4	Planer Mill Cyclone No. 1	PM	E = 3.59(P) ^{0.62} for P<30 TPH	ADEM Admin. Code r. 335-3-4-.04
C-5	Planer Mill Cyclone No. 2		E = 17.31(P) ^{0.16} for P≥30 TPH	

Emission Unit No. 004 (Wood Waste Transfer System)
Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p>
<p>2. <u>Emission Standards</u></p> <p>The permittee shall not cause or permit the emission of particulate matter in any one hour from this process in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p>Or</p> $E = 17.31 P^{0.16} \quad (P \geq 30 \text{ TPH})$ <p>where E = Emissions in pounds per hour P = Process weight in tons per hour</p>	<p>ADEM Admin. Code r. 335-3-4-.04</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate from this process shall be determined in accordance with Method 5 at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p> <p>(b) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>
<p>4. <u>Emission Monitoring</u></p> <p>(a) At least once per week during daylight hours while the process is operating, permittee personnel familiar with the process shall observe the cyclones for greater than normal visible emissions as determined by previous observations of normal operations.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(b) Whenever observed visible emissions are greater than normal, corrective action shall be initiated as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.</p> <p>(c) The cyclones shall be inspected for proper operation and cleaned at least annually, but more frequently whenever observed visible emissions are greater than normal. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours from the completion of the inspection.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) The permittee shall maintain records of emission monitoring performed in a permanent form on-site and available for inspection for at least five (5) years from the date of generation of each record. These records shall include:</p> <ul style="list-style-type: none"> (i) The date, time, and results of each weekly observation for greater than normal visible emissions; (ii) The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed; (iii) The date(s) and time the cyclones were inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed. <p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the following information for this emission unit:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(i) A statement as to whether all observations for greater than normal visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;</p> <p>(ii) A statement as to whether the annual inspection of the cyclones were accomplished during the reporting period, and if so, the date and results of the inspection;</p> <p>(iii) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed or (2) an inspection of the cyclones indicated that cleaning or emissions-related maintenance was needed.</p>	