

**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 April 7, 2015, and will expire on November 8, 2019.

East Alabama Lumber Company, Inc.'s (East Alabama Lumber) operates a softwood sawmill in Lafayette, Chambers County. The significant sources of air pollutants include a 30 MMBtu/hr wood-fired suspension burner that provides direct heat to a 174 MBF dry kiln (EU 001); a 35 MMBtu/hr wood-fired suspension burner that provides direct heat to a 184 MBF dry kiln (EU 002); sawmill operations (EU 003) including a sawdust cyclone located above the fuel silo, and two (2) chippers with two (2) cyclones; and planer mill operations (EU 004) with two (2) cyclones. Insignificant emission sources at this facility include wet decking operations, parts washing, petroleum storage and loading/unloading, mobile internal combustion engines, miscellaneous wood waste handling, unpaved roads, and ash handling. 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 matter (PM), carbon monoxide (CO), and volatile organic compounds (VOC) each exceed the 100 TPY major source threshold. The facility 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 total HAP emissions to less than 25 TPY.

Prevention of Significant Deterioration (PSD)

The facility operations are not one of the 28 listed major source categories, and the facility is located in an attainment area for all criteria pollutants. Therefore, the major source thresholds of concern are 250 TPY for criteria pollutants. The facility is currently listed as a minor source under PSD regulations; however, after reviewing the potential VOC emissions from the kilns, the facility is now considered a synthetic minor source, as East Alabama Lumber's facility-wide throughput limit of 100 MMBF during any consecutive 12-month period limits the potential VOC emissions below the major source threshold of 250 TPY.

NSPS

There are no sources at this facility that would be subject to any federal New Source Performance Standard (NSPS) regulations.

NESHAP

This facility is considered an area source under 40 CFR 63, National Emission Standards for Hazardous Air Pollutants 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 total HAP to less than 25 TPY. There are currently no area source Maximum Available Control Technology (MACT) regulations applicable to the sources at this facility.

Applicability: State Regulations

Particulate Matter

Emissions from each process are subject to the particulate matter (as TSP) emission limitation of ADEM Admin. Code r. 335-3-4-.04 for Process Industries-General. The allowable emission rate for each of the facility processes is calculated using the following process weight equations:

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

Or

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

where E = Emissions in pounds per hour

P = Process weight in tons per hour

Visible Emissions

The facility is subject to the State visible emissions standard of ADEM Admin. Code r. 335-3-4-.01(1) which states that each stationary source at the facility shall not emit particulate of an opacity greater than twenty percent (20%) (as measured by a six-minute average) more than once during any 60-minute period and at no time shall emit particulate of an opacity greater than 40% (as measured by a six-minute average).

Sulfur Oxides (SO_x)

The wood-fired suspension burners do not meet the definition of fuel burning equipment, as defined by ADEM Admin. Code r. 335-3-1-.02, because they provide direct heat to the kilns; therefore, the burners are not subject to any sulfur dioxide (SO_2) emission limitations of ADEM Admin. Code r. 335-3-5.

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 (184 MBF Lumber Dry Kiln with 35 MMBtu/hr Wood-Fired Burner)

To ensure the 100 MMBF production limit is not exceeded, within ten days after the end of each month, compliance with the combined 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.

Compliance Assurance Monitoring (CAM)

According to the application, there are no units at the facility that have prior to a control device the potential to emit greater than 100 TPY of any criteria pollutant. Therefore, this facility is not required to submit a CAM plan for this renewal.

Recordkeeping and Reporting Requirements

The permittee would be required to maintain records of production for EU 001 and EU 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 EU 003 and EU 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.

Air Quality Impact

This facility is located in Chambers County, which is an attainment area for all criteria pollutants. It is not located within a 100 km radius of any PSD Class I Area. Therefore, the emissions from

this facility are not expected to have any significant impact on the area.

Public Comment

The renewal of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

Based on the above analysis, I recommend East Alabama Lumber'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.

Chris Ailor
Chemical Branch
Air Division

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Date