



Alabama Department of Environmental Management
adem.alabama.gov

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January 2, 2025

Mr. D.J. Russell, Jr.
West Fraser, Inc.
2100 Industrial Blvd
Opelika, AL 36801

Dear Mr. Russell:

**RE: Major Source Operating Permit Renewal
West Fraser, Inc. – Opelika Lumber Mill
Facility/Permit No. 206-S004**

The enclosed Major Source Operating Permit (MSOP) is issued pursuant to the Department's air pollution control rules and regulations. This permit underwent a 30-day Public Notice and 45-day EPA review as required by ADEM Admin. Code r. 335-3-16-.15. No public comments or EPA comments were received; therefore, this permit has been issued as proposed. Please review the permit and note the conditions which must be observed in order to retain this permit. You should be especially aware that unit specific provisos may have been revised in this renewal permit. Please also note that this permit will be effective on January 2, 2025, and your current MSOP expired on November 18, 2024.

This renewal MSOP has a term of five (5) years and will expire on January 2, 2030. A renewal application should be submitted to the Air Division at least six (6) months, but no earlier than eighteen (18) months, prior to this expiration date.

Please note General Permit Proviso Nos. 12 and 21 of this MSOP, which require the submittal of Annual Compliance Certifications and Semiannual Monitoring Reports, respectively. To provide compliance assistance, the following tables have been provided to list the applicable reporting periods and due dates for these reports, based upon the effective date of this MSOP.

Annual Compliance Certifications			
Permit Year	Reporting Periods		Due Date
	From	To	
1	January 2, 2025	November 18, 2025	January 18, 2026
2	November 19, 2025	November 18, 2026	January 18, 2027
3	November 19, 2026	November 18, 2027	January 18, 2028
4	November 19, 2027	November 18, 2028	January 18, 2029
5	November 19, 2028	November 18, 2029	January 18, 2030



Semiannual Monitoring Reports			
Permit Year	Reporting Periods		Due Date
	From	To	
1	January 2, 2025	May 18, 2025	July 18, 2025
	May 19, 2025	November 18, 2025	January 18, 2026
2	November 19, 2025	May 18, 2026	July 18, 2026
	May 19, 2026	November 18, 2026	January 18, 2027
3	November 19, 2026	May 18, 2027	July 18, 2027
	May 19, 2027	November 18, 2027	January 18, 2028
4	November 19, 2027	May 18, 2028	July 18, 2028
	May 19, 2028	November 18, 2028	January 18, 2029
5	November 19, 2028	May 18, 2029	July 18, 2029
	May 19, 2029	November 18, 2029	January 18, 2030

Please also note that the final Annual Compliance Certification for the period of November 19, 2023, through November 18, 2024, and the final Semiannual Monitoring Report for the period of May 19, 2024, through November 18, 2024, for the current MSOP should be submitted to the Air Division no later than January 18, 2025. Additionally, an Annual Compliance Certification and Semiannual Monitoring Report for the period of November 19, 2024, through January 1, 2025, will need to be submitted to cover the period the facility was operating under the previous MSOP. The Annual Compliance Certification should also be submitted by this date to the EPA through EPA's Compliance and Emissions Data Reporting Interface (CEDRI) or via email to EPA_R4_CAA_Reports@epa.gov.

If you have any questions or require clarification of permit conditions, please contact Melanie Nabors at (334) 271-7813 or by email at melanie.nabors@adem.alabama.gov.

Sincerely,



Aubrey H White III, Chief
Air Division

AHW/MCN

Enclosure



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: WEST FRASER, INC.
FACILITY NAME: WEST FRASER, INC.
FACILITY/PERMIT NO.: 206-S004
LOCATION: OPELIKA, LEE COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, 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: January 2, 2025
Effective Date: January 2, 2025
Expiration Date: January 2, 2030

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General Permit Provisos	
Federally Enforceable Provisos	Regulations
<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>

General Permit Provisos

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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>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>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>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>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>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-.05(h)</p> <p>ADEM Admin. Code r. 335-3-16-.05(i)</p> <p>ADEM Admin. Code r. 335-3-16-.05(j)</p> <p>ADEM Admin. Code r. 335-3-16-.05(k)</p> <p>ADEM Admin. Code r. 335-3-16-.07(a)</p> <p>ADEM Admin. Code r. 335-3-16-.07(b)</p>

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<ul style="list-style-type: none"> (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; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (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; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements. <p>11. Compliance Provisions</p> <ul style="list-style-type: none"> (a) The Permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. (b) The Permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit. <p>12. Compliance Certification</p> <p>The Permittee shall submit a complete and accurate compliance certification by January 18th of each year for each annual reporting period of this permit (November 19th – November 18th).</p> <ul style="list-style-type: none"> (a) The compliance certification shall include the following: <ul style="list-style-type: none"> (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (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 Recordkeeping Requirements); (4) Whether compliance has been continuous or intermittent; (5) Such other facts as the Air Division may require to determine the compliance status of the source; (b) The compliance certification shall be submitted to: 	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p> <p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

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<p>Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p>and to:</p> <p>EPA Region 4 via email at EPA_R4_CAA_Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)</p> <p>13. <u>Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <ul style="list-style-type: none"> (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. (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. (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. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements. <p>14. <u>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>ADEM Admin. Code r. 335-3-16-.13(5)</p> <p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>

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15. <u>Equipment Maintenance or Breakdown</u>	
<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>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p>
16. <u>Operation of Capture and Control Devices</u>	
<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>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>

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<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>ADEM Admin. Code r. 335-3-1-.08</p> <p>ADEM Admin. Code r. 335-3-4-.02</p>
<p>19. <u>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>	<p>ADEM Admin. Code r. 335-3-16-.13 and 335-3-16-.14</p>

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<u>20. Recordkeeping Requirements</u>	
<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>	<p>ADEM Admin. Code r. 335-3-16-.05(c)2.</p>
<u>21. Reporting Requirements</u>	
<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>	<p>ADEM Admin. Code r. 335-3-16-.05(c)3.</p>
<u>22. Emission Testing Requirements</u>	
<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>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p>

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<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. Payment of Emission Fees</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. (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. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>

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<p><u>24. Other Reporting and Testing Requirements</u></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> <p><u>25. Title VI Requirements (Refrigerants)</u></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> <p><u>26. Chemical Accidental Prevention Provisions</u></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> <p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a) or,</p> <p>(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.</p>	<p>ADEM Admin. Code r. 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p> <p>40 CFR Part 68</p>

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<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 will make the permit readily available for inspection by any or all persons who may request to see it.</p>	<p>ADEM Admin. Code r. 335-3-16-.02(2)</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>
<p>34. <u>Permit Shield</u></p> <p>A Permit Shield exists under this operating permit in accordance with ADEM Admin. Code . 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in this operating permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.10</p>

Emission Unit No. 001 (Dry Kiln No. 1)**Summary Page**

Description: 87.5 MMBF/yr Continuous Direct-Fired Kiln No. 1 with 40 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
OPLK01	Dry Kiln No. 1	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
		VOC	Combined Throughput Limit for Dry Kiln Nos. 1 and 2: 175 MMBF during any consecutive 12- month period	ADEM Admin. Code r. 335-3-14-.04
			3.76 lb/MBF	

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

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>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in any one hour from this unit in excess of the amount determined by the following equations:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">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 volatile organic compounds (VOC) emissions from Continuous Dry Kiln Nos. 1 and 2 (OPLK01 and OPLK02) to exceed 3.76 lb/MBF.</p> <p>(c) The Permittee shall not cause or allow the combined throughput from Continuous Dry Kiln Nos. 1 and 2 (OPLK01 and OPLK02) to exceed 175 MMBF 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 of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5, or an alternative method if prior approval is granted by the Director.</p> <p>(b) If testing is required, the volatile organic compound (VOC) emission rate of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, 25A, or an alternative method if approved in advance by the Air Division.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</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>(a) Within 10 days of the end of each calendar month, the Permittee shall calculate the total combined throughput for Dry Kiln Nos. 1 and 2 for the previous calendar month and previous 12-month period.</p> <p>(b) The Permittee shall use proper maintenance and operating practices for the Continuous Dry Kiln Nos. 1 and 2 as recommended by the manufacturer, which include but may not be limited to the following:</p> <p>(1) Proper Operating Practices</p> <p>(i) Operate the kilns within a temperature range recommended by the manufacturer depending on the dimensions of the lumber being dried. The temperature shall be continuously monitored by a dry bulb temperature sensor.</p> <p>(ii) Utilize the proper kiln feed rates, which would be recommended by the manufacturer depending upon the dimensions and moisture content of the lumber being dried and other variables such as air flow, weather, time of year, and target moisture content.</p> <p>(2) Proper Maintenance Practices</p> <p>(i) Conduct daily routine maintenance to include cleaning debris from around the kiln and pusher tracks;</p> <p>(ii) Conduct weekly routine maintenance to include greasing the kiln fan shafts;</p> <p>(iii) Conduct quarterly routine maintenance to include greasing and lubricating the fan motors and bearings;</p> <p>(iv) Conduct semiannual routine maintenance to include checking and retightening (if needed) the motor mount bolts and taper lock bolts;</p>	

Federally Enforceable Provisos	Regulations
<p>(v) Conduct annual routine maintenance to include the following:</p> <ul style="list-style-type: none"> • Inspect the controller cabinet for dust and small debris; • Inspect all sensors for proper operation; • Inspect and adjust (if needed) all intake vent lids to assure they are opening and closing in unison and that they close tightly • Inspect all rods and linkage bolts for tightness, wear, and necessary maintenance or replacement; • Grease of rod support bearing for smooth rotation; and • Remove cover and inspect the motor wiring box for moisture or corroded connections. Clean and repair as needed. 	
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The Permittee shall maintain records of the combined throughput for Dry Kiln Nos. 1 and 2 on a monthly and 12-month rolling total basis. These records shall be kept in a permanent form suitable for inspection, shall be retained for a period of five years from the date of generation of each record, and shall be made available for inspection upon request.</p> <p>(b) Should this unit, at any time, exceed any applicable limit, the Permittee shall notify the Air Division 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 (November 19th – May 18th and May 19th – November 18th). The report shall include a certification that all emission monitoring and recordkeeping was accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.</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: 87.5 MMBF/yr Continuous Direct-Fired Kiln No. 2 with 40 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
OPLK02	Dry Kiln No. 2	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
		VOC	Combined Throughput Limit for Dry Kiln Nos. 1 and 2: 175 MMBF during any consecutive 12- month period	ADEM Admin. Code r. 335-3-14-.04
			3.76 lb/MMBF	

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

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>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in any one hour from this unit in excess of the amount determined by the following equations:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">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 volatile organic compounds (VOC) emissions from Continuous Dry Kiln Nos. 1 and 2 (OPLK01 and OPLK02) to exceed 3.76 lb/MBF.</p> <p>(c) The Permittee shall not cause or allow the combined throughput from Continuous Dry Kiln Nos. 1 and 2 (OPLK01 and OPLK02) to exceed 175 MMBF 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 of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5, or an alternative method if prior approval is granted by the Director.</p> <p>(b) If testing is required, the volatile organic compound (VOC) emission rate of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, 25A, or an alternative method if approved in advance by the Air Division.</p> <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. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin Code r. 335-3-14-.04</p> <p>ADEM Admin Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</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>4. <u>Emission Monitoring</u></p> <p>(a) Within 10 days of the end of each calendar month, the Permittee shall calculate the total combined throughput for Dry Kiln Nos. 1 and 2 for the previous calendar month and previous 12-month period.</p> <p>(b) The Permittee shall use proper maintenance and operating practices for the Continuous Dry Kiln Nos. 1 and 2 as recommended by the manufacturer, which include but may be limited to the following:</p> <p>(1) Proper Operating Practices</p> <p>(i) Operate the kilns within a temperature range recommended by the manufacturer depending on the dimensions of the lumber being dried. The temperature shall be continuously monitored by a dry bulb temperature sensor.</p> <p>(ii) Utilize the proper kiln feed rates, which would be recommended by the manufacturer depending upon the dimensions and moisture content of the lumber being dried and other variables such as air flow, weather, time of year, and target moisture content.</p> <p>(2) Proper Maintenance Practices</p> <p>(i) Conduct daily routine maintenance to include cleaning debris from around the kiln and pusher tracks;</p> <p>(ii) Conduct weekly routine maintenance to include greasing the kiln fan shafts;</p> <p>(iii) Conduct quarterly routine maintenance to include greasing and lubricating the fan motors and bearings;</p> <p>(iv) Conduct semiannual routine maintenance to include checking and retightening (if needed) the motor mount bolts and taper lock bolts;</p> <p>(v) Conduct annual routine maintenance to include the following:</p> <ul style="list-style-type: none"> • Inspect the controller cabinet for dust and small debris; • Inspect all sensors for proper operation; • Inspect and adjust (if needed) all intake vent lids to assure they are opening and closing in unison and that they close tightly; 	<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
<ul style="list-style-type: none"> • Inspect all rods and linkage bolts for tightness, wear, and necessary maintenance or replacement; • Grease each rod support bearing for smooth rotation; and • Remove cover and inspect the motor wiring box for moisture or corroded connections. Clean and repair as needed. 	
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The Permittee shall maintain records of the combined throughput for Dry Kiln Nos. 1 and 2 on a monthly and 12-month rolling total basis. These records shall be kept in a permanent form suitable for inspection, shall be retained for a period of five years from the date of generation of each record, and shall be made available for inspection upon request.</p> <p>(b) Should this unit, at any time, exceed any applicable limit, the Permittee shall notify the Air Division 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 (November 19th – May 18th and May 19th – November 18th). The report shall include a certification that all emission monitoring and recordkeeping was accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.</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 (Dry Kiln No. 3)**Summary Page**

Description: 60 MMBF/yr Batch Direct-Fired Kiln No. 3 with 25 MMBtu/hr Wood-Fired Suspension 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
OPLK03	Dry Kiln No. 3	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
			3.68 lb/hr (SMS)	ADEM Admin. Code r. 335-3-14-.04
		VOC	Throughput Limit: 60 MMBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.04
			21.57 lb/hr	

Emission Unit No. 003 (Dry Kiln No. 3)
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>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in any one hour from this unit in excess of the amount determined by the following equations:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">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 PM emissions from Batch Dry Kiln No. 3 (OPLK03) to exceed 3.68 lb/hr.</p> <p>(c) The Permittee shall not cause or allow the volatile organic compounds (VOC) emissions from Batch Dry Kiln No. 3 (OPLK03) to exceed 21.57 lb/hr.</p> <p>(d) The Permittee shall not cause or allow the throughput from Continuous Dry Kiln No. 3 (OPLK03) to exceed 60 MMBF 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 of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5, or an alternative method if prior approval is granted by the Director.</p> <p>(b) If testing is required, the volatile organic compound (VOC) emission rate of this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 18, 25A, or an alternative method if approved in advance by the Air Division.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</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 of the end of each calendar month, the Permittee shall calculate the total combined throughput for Dry Kiln No. 3 for the previous calendar month and previous 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 the throughput for Dry Kiln No. 3 on a monthly and 12-month rolling total basis. These records shall be kept in a permanent form suitable for inspection, shall be retained for a period of five years from the date of generation of each record, and shall be made available for inspection upon request.</p> <p>(b) Should this unit, at any time, exceed any applicable limit, the Permittee shall notify the Air Division 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 (November 19th – May 18th and May 19th – November 18th). The report shall include a certification that all emission monitoring and recordkeeping was accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.</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. 004 (Planer Mill Operations)

Summary Page

Description: Planer Mill Operations and Biomass Transfer System with High Efficiency Cyclofilter

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
OPCY05	Planer Mill Cyclofilter	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
			1.08 lb/hr (SMS)	ADEM Admin. Code r. 335-3-14-.04
		PM ₁₀	1.08 lb/hr (SMS)	ADEM Admin. Code r. 335-3-14-.04
		PM _{2.5}	0.39 lb/hr (SMS)	ADEM Admin. Code r. 335-3-14-.04

Emission Unit No. 004 (Planer Mill Operations)

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>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 process in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">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 PM emissions from the cyclofilter (OPCY05) to exceed 1.08 lb/hr.</p> <p>(c) The Permittee shall not cause or allow the PM₁₀ emissions from the cyclofilter (OPCY05) to exceed 1.08 lb/hr.</p> <p>(d) The Permittee shall not cause or allow the PM_{2.5} emissions from the cyclofilter (OPCY05) to exceed 0.39 lb/hr.</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. Visible emissions shall be determined in accordance with Method 9 at 40 CFR 60, Appendix A, during the particulate testing.</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. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</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>4. <u>Emission Monitoring</u></p> <p>(a) At least weekly during daylight hours, while the process is operating, personnel familiar with the process shall perform an instantaneous check of the exhaust from the cyclofilter for the presence of greater than normal visible emissions.</p> <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 instantaneous check to confirm that emissions have been reduced to normal.</p> <p>(c) The cyclofilter 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 after completing 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>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 the required emission monitoring 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 shall include:</p> <p>(i) The date, time, and results of each instantaneous check for visible emissions;</p> <p>(ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and</p> <p>(iii) The date(s) and time the cyclofilter 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.</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 (November 19th – May 18th and May 19th – November 18th). The report shall include the following information for this emission source:</p> <p>(i) A statement as to whether all emission monitoring was completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;</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>(ii) A statement as to whether the annual inspection of the cyclofilter was accomplished during the reporting period, and if so, the date and results of each 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 cyclofilter indicated that cleaning or emission-related maintenance was needed.</p>	

Emission Unit No. 005 (Fuel Storage Operations)

Summary Page

Description: Fuel Storage Silo with Cyclone

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

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
OPCY04	Fuel Storage Cyclone	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
			2.0 lb/hr	ADEM Admin. Code r. 335-3-14-.04

Emission Unit No. 005 (Fuel Storage Operations)
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>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in any one hour from this process in excess of the amount determined by the following equations:</p> $E = 3.59 P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">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 PM emissions from the fuel storage silo cyclone (OPCY04) to exceed 2.0 lb/hr.</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. Visible emissions shall be determined in accordance with Method 9 at 40 CFR 60, Appendix A, during the particulate testing.</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>4. <u>Emission Monitoring</u></p> <p>(a) At least weekly during daylight hours, while the process is operating, Permittee personnel familiar with the process shall perform an instantaneous check of the exhaust from the cyclone for the presence of greater than normal visible emissions.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</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 instantaneous check to confirm that emissions have been reduced to normal.</p> <p>(c) The cyclone 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 after completing 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 the required emission monitoring 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 shall include:</p> <p>(i) The date, time, and results of each instantaneous check for visible emissions;</p> <p>(ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and</p> <p>(iii) The date(s) and time the cyclone 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.</p>	<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 (November 19th – May 18th and May 19th – November 18th). The report shall include the following information for this emission source:</p> <p>(i) A statement as to whether all emission monitoring was 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 cyclone was accomplished during the reporting period, and if so, the date and results of each inspection</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<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 cyclone indicated that cleaning or emission-related maintenance was needed.</p>	

Emission Unit No. 007 (Emergency Fire Pump Engine No. 2)

Summary Page

Description: 238 bHp John Deere, Compression Ignition, Diesel-fired Emergency Fire Pump Engine

Permitted Operating Schedule: Emergency usage and 100 hours per year for maintenance and testing

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
OPEG02	238 bHp Emergency Fire Pump Engine	NMHC + NO _x	4.0 g/kW-hr (3.0 g/hp-hr)	40 CFR §60.4202; and 40 CFR §60.4205(c)
		PM	0.20 g/kW-hr (0.15 g/hp-hr)	40 CFR §60.4202; and 40 CFR §60.4205(c)
		SO ₂ , CO, VOC	N/A	N/A

Emission Unit No. 007 (Emergency Fire Pump Engine 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 the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 8 to Subpart ZZZZ. To comply with Subpart ZZZZ for this engine, the Permittee shall meet the requirements of 40 CFR 60, Subpart IIII.</p> <p>(c) This unit is subject to the applicable requirements of the 40 CFR 60, Subpart IIII, the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines.</p> <p>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall comply with the applicable requirements of 40 CFR §60.4205(c) and Table 4 to Subpart IIII, the Permittee shall not cause or allow the emissions from this unit to exceed the applicable emission standards in 40 CFR §89.112, specifically:</p> <p>(i) The sum of the emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NO_x) shall not exceed 4.0 g/kW-hr (3.0 g/hp-hr); and</p> <p>(ii) Particulate matter (PM) emissions shall not exceed 0.20 g/kW-hr (0.15 g/hp-hr).</p> <p>(b) The Permittee shall not burn any diesel fuel in this unit that does not meet the following standards of 40 CFR §80.510(b):</p> <p>(i) Sulfur content shall not exceed 15 parts per million (ppm); and</p> <p>(ii) Cetane index shall be a minimum of 40, or the aromatic content shall not exceed 35 percent by volume.</p> <p>(c) The Permittee shall only operate this unit as specified below:</p> <p>(i) Emergency situations; and</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(103); and 40 CFR 63, Subpart ZZZZ</p> <p>ADEM Admin. Code r. 335-3-10-.03(87); 40 CFR 60, Subpart A; and 40 CFR 60, Subpart IIII</p> <p>40 CFR §60.4202; and 40 CFR §60.4205(c)</p> <p>40 CFR §60.4207</p> <p>40 CFR §60.4207</p>

Federally Enforceable Provisos	Regulations
<p>(ii) Maintenance checks and readiness testing not to exceed 100 hours per year.</p>	
<p>3. <u>Emission Monitoring</u></p> <p>(a) The Permittee shall operate and maintain this unit according to the manufacturer's written instructions over the entire life of engine.</p> <p>(b) The Permittee shall install and operate a non-resettable hour meter.</p>	<p>40 CFR §60.4206; and 40 CFR §60.4211(a)</p> <p>40 CFR §60.4209</p>
<p>4. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The Permittee shall submit notifications as to the date construction is commenced postmarked no later than 30 days after such date and the actual date of initial startup postmarked within 15 days after such date.</p> <p>(b) To demonstrate compliance with the operational limitations, the Permittee shall maintain records of the date, time, duration, and purpose of operation each time these units is operated. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.</p> <p>(c) To demonstrate compliance with the fuel limitations, the Permittee shall maintain records of the sulfur content and either the Cetane index or aromatic content of the diesel fuel that is burned in these units. These records shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for a period of five (5) years from the date of generation of each record.</p>	<p>40 CFR §60.7(a)(1) and (3)</p> <p>40 CFR §60.4214</p> <p>40 CFR §60.4214</p>

Provisos for Facility-Wide Fugitive Dust

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "<i>Major Source Operating Permits.</i>"</p> <p>2. <u>Emission Standards</u></p> <p>The Permittee shall take reasonable precautions as directed in Proviso 1 of the "Compliance and Performance Test Methods and Procedures" section below to prevent fugitive dust at the facility which travel beyond the facility property line and cause a nuisance.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>The Permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p> <p>4. <u>Emissions Monitoring</u></p> <p>The Permittee shall conduct weekly, considering factors such as naturally wet conditions, visual observations for fugitive dust in areas listed with potential to generate fugitive dust, and if visible emissions traveling beyond the facility property line are observed, any necessary corrective actions shall be initiated within four (4) hours of observation.</p> <p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of Proviso 1 of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.02</p> <p>ADEM Admin. Code r. 335-3-16-.07</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>

Appendix A
West Fraser, Inc.
Opelika Lumber Mill
206-S004
Fugitive Dust Management Plan

FUGITIVE EMISSIONS CONTROL PLAN

West Fraser Opelika (WF) will take all reasonable precautions to prevent emissions of unconfined particulate matter from any activity, including vehicular movement and loading, unloading, storing, or handling raw material or products. Such precautions include the following options, as needed, to ensure compliance with permitted opacity limits.

- Pave and/or maintain roads, parking areas, and yards
- Application of water or other dust suppressants to surface areas
- Clean surfaces and tires of vehicles to prevent out-tracking
- Limit vehicle access
- Routine maintenance and cleaning of process equipment
- Enclose or cover conveyor systems
- Implement operational measures to reduce dust

These options will be employed when necessary for fugitive dust suppression.

Vehicular Movement

A great deal of fugitive dust at industrial sites is due to vehicle traffic. WF has paved and/or concreted most of the operational areas of the facility. The reduction of unpaved surfaces has greatly reduced fugitive dust emissions from road traffic. WF regulates the traffic by only allowing authorized vehicles on the site and has limited traffic to 10 miles per hour.

Should on site areas become dusty and generate excess opacity emissions, the facility will sweep or apply water to those paved surfaces and/or complete cleaning of surfaces and tires to prevent out-tracking, or simply limit vehicle access to dusty areas.

Material Handling

The conveyance of byproducts, such as sawdust or shavings, has the potential to generate airborne dust. WF ensures limited fugitive dust generation through their material handling processes by enclosing conveyance and storage where possible. Byproducts are held within bins and any spilled materials are cleaned from the ground or surfaces routinely. Personnel are trained on the housekeeping requirements for the facility. Routine walkthroughs identify any area requiring attention.

Action Required

WF will ensure that dust will not be emitted in an amount to cause a nuisance offsite or violate any rule or regulation of the Department.

Should greater than normal visible emissions be observed leaving the site, an assessment will be completed to determine the cause. A corrective action will be completed to get the visible emissions back to normal levels within 24 hours of observation. Records, including the date, time, excess visible emission observation, cause, and corrective action, will be maintained. The records shall be retained for five years from the date of generation.