



# 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, 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:** DRAFT

**Effective Date:**

**Expiration Date:**

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General Permit Provisos	
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<p><b>1. <u>Transfer</u></b></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><b>2. <u>Renewals</u></b></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><b>3. <u>Severability Clause</u></b></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><b>4. <u>Compliance</u></b></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-.02(6)</p> <p>ADEM Admin. Code r. 335-3-16-.12(2)</p> <p>ADEM Admin. Code r. 335-3-16-.05(e)</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><b>5. <u>Termination for Cause</u></b></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><b>6. <u>Property Rights</u></b></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><b>7. <u>Submission of Information</u></b></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><b>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b></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><b>9. <u>Certification of Truth, Accuracy, and Completeness</u></b></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><b>10. <u>Inspection and Entry</u></b></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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<ul style="list-style-type: none"> <li>(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;</li> <li>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</li> <li>(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;</li> <li>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</li> </ul>	
<b>11. <u>Compliance Provisions</u></b>	
<ul style="list-style-type: none"> <li>(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</li> <li>(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p>
<b>12. <u>Compliance Certification</u></b>	
<p>The permittee shall submit a complete and accurate compliance certification by January 7<sup>th</sup> of each year for each annual reporting period of this permit (November 9<sup>th</sup> – November 8<sup>th</sup>).</p> <ul style="list-style-type: none"> <li>(a) The compliance certification shall include the following: <ul style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(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);</li> <li>(4) Whether compliance has been continuous or intermittent;</li> <li>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</li> </ul> </li> <li>(b) The compliance certification shall be submitted to:</li> </ul>	<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><b>13. Reopening for Cause</b></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"> <li>(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.</li> <li>(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.</li> <li>(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.</li> <li>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</li> </ul> <p><b>14. Additional Rules and Regulations</b></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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<b>15. <u>Equipment Maintenance or Breakdown</u></b>	
<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"> <li>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</li> <li>(2) The expected length of time that the air pollution control equipment will be out of service;</li> <li>(3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period;</li> <li>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</li> <li>(5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period.</li> </ol> <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>
<b>16. <u>Operation of Capture and Control Devices</u></b>	
<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><b>17. <u>Obnoxious Odors</u></b></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><b>18. <u>Fugitive Dust</u></b></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> <p>(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;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(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> <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><b>19. <u>Additions and Revisions</u></b></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. 335-3-1-.08</p> <p>ADEM Admin. Code r. 335-3-4-.02</p> <p>ADEM Admin. Code r. 335-3-16-.13 and 335-3-16-.14</p>

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<p><b>20. <u>Recordkeeping Requirements</u></b></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <ul style="list-style-type: none"> <li>(1) The date, place, and time of all sampling or measurements;</li> <li>(2) The date analyses were performed;</li> <li>(3) The company or entity that performed the analyses;</li> <li>(4) The analytical techniques or methods used;</li> <li>(5) The results of all analyses; and</li> <li>(6) The operating conditions that existed at the time of sampling or measurement.</li> </ul> <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><b>21. <u>Reporting Requirements</u></b></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> <p><b>22. <u>Emission Testing Requirements</u></b></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>ADEM Admin. Code r. 335-3-16-.05(c)2.</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)3.</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"> <li>(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.</li> <li>(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).</li> <li>(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.</li> <li>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</li> </ul> <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><b>23. <u>Payment of Emission Fees</u></b></p> <ul style="list-style-type: none"> <li>(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.</li> <li>(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.</li> </ul>	<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-.04</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>

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<p><b>24. <u>Other Reporting and Testing Requirements</u></b></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><b>25. <u>Title VI Requirements (Refrigerants)</u></b></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><b>26. <u>Chemical Accidental Prevention Provisions</u></b></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><b>27. <u>Display of Permit</u></b></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. 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p> <p>40 CFR Part 68</p> <p>ADEM Admin. Code r. 335-3-16-.02(2)</p>

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<p><b>28. <u>Circumvention</u></b></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><b>29. <u>Visible Emissions</u></b></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><b>30. <u>Fuel-Burning Equipment</u></b></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><b>31. <u>Process Industries – General</u></b></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><b>32. <u>Averaging Time for Emission Limits</u></b></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>
<p><b>33. <u>Open Burning</u></b></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
		VOC	Combined Throughput Limit: 100 MMBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.04
		HAP	Combined Throughput Limit: 100 MMBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.03

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

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></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 source emission limitation to restrict the facility's potential to emit VOCs below the applicability threshold established at ADEM Admin. Code r. 335-3-14-.04, Air Permits Authorizing Construction in Clean Areas (Prevention of Significant Deterioration [PSD]).</p> <p>(c) This unit is subject to a synthetic minor emission limitation to restrict the facility-wide emissions of hazardous air pollutants (HAP), as listed in ADEM Admin. Code 335-3, Appendix G, below the applicable major source thresholds for HAP during any consecutive 12-month period.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from these units 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 <math>E</math> = Emissions in pounds per hour  <math>P</math> = Process weight in tons per hour</p> <p>(b) The permittee shall not cause or allow the combined throughput from Dry Kiln Nos. 1 and 2 to exceed 100 MMBF during any consecutive 12-month period.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></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.</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.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin Code r. 335-3-14-.03 and 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><b>4. <u>Emission Monitoring</u></b></p> <p>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>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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 (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). 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:** 184 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
		VOC	Combined Throughput Limit: 100 MMBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.04
		HAP	Combined Throughput Limit: 100 MMBF during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.03

**Emission Unit No. 002 (Dry Kiln No. 2)**  
**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></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 source emission limitation to restrict the facility's potential to emit VOCs below the applicability threshold established at ADEM Admin. Code r. 335-3-14-.04, Air Permits Authorizing Construction in Clean Areas (Prevention of Significant Deterioration [PSD]).</p> <p>(c) This unit is subject to a synthetic minor emission limitation to restrict the facility-wide emissions of hazardous air pollutants (HAP), as listed in ADEM Admin. Code 335-3, Appendix G, below the applicable major source thresholds for HAP during any consecutive 12-month period.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from these units 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 <math>E</math> = Emissions in pounds per hour  <math>P</math> = Process weight in tons per hour</p> <p>(b) The permittee shall not cause or allow the combined throughput from Dry Kiln Nos. 1 and 2 to exceed 100 MMBF during any consecutive 12-month period.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></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.</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.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin Code r. 335-3-14-.03 and 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><b>4. <u>Emission Monitoring</u></b></p> <p>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>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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 (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). 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 (Sawmill Operations)

### Summary Page

**Description:** Sawmill with a 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
CY-1	Sawmill 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

**Emission Unit No. 003 (Sawmill Operations)**  
**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p><b>2. <u>Emission Standards</u></b></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 <math>E</math> = Emissions in pounds per hour  <math>P</math> = Process weight in tons per hour</p> <p>(b) The permittee shall not cause or allow visible emissions with a six minute average opacity greater than 20% to be emitted more than once during any 60 minute period. The permittee shall not cause or allow visible emissions with a six minute average opacity of greater than 40% to be emitted at any time.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></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.</p> <p>(b) If testing is required, the visible emissions shall be determined in accordance with Method 9 at 40 CFR 60, Appendix A.</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. 335-3-4-.01(1)</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><b>4. <u>Emission Monitoring</u></b></p> <p>(a) At least daily during daylight hours, while the process is operating, personnel familiar with the process shall perform an instantaneous check of the exhaust from the cyclone (CY-1) for the presence of greater than normal visible emissions, as determined by previous observations.</p> <p>(b) Whenever observed visible emissions are greater than normal from the cyclone (CY-1), 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 visible emissions have been reduced to normal.</p> <p>(c) The cyclone (CY-1) 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 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>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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> <ul style="list-style-type: none"> <li>(i) The date, time, and results of each observation for visible emissions;</li> <li>(ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and</li> <li>(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.</li> </ul> <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 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(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;</li> </ul>	<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 each cyclone 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 cyclone(s) indicated that cleaning or emission-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
CY-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
CY-5	Planer Mill Cyclone No. 2		Or $E = 17.31(P)^{0.16}$ for $P \geq 30$ TPH	



**Emission Unit No. 004 (Planer Mill Operations)**  
**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></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><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each of this process in excess of the amount determined by the following equations:</p> $E = 3.59 P^{0.62} (P < 30 \text{ TPH})$ <p style="text-align: center;">Or</p> $E = 17.31 P^{0.16} (P \geq 30 \text{ TPH})$ <p>Where    <math>E</math> = Emissions in pounds per hour                <math>P</math> = Process weight in tons per hour</p> <p>(b) The permittee shall not cause or allow visible emissions with a six-minute average opacity greater than 20% to be emitted more than once during any 60-minute period. The permittee shall not cause or allow visible emissions with a six-minute average opacity of greater than 40% to be emitted at any time.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></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.</p> <p>(b) If testing is required, visible emissions shall be determined in accordance with Method 9 at 40 CFR 60, Appendix A.</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. 335-3-4-.01(1)</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><b>4. <u>Emission Monitoring</u></b></p> <p>(a) At least daily during daylight hours, while the process is operating, personnel familiar with the process shall perform an instantaneous check of the exhaust from each cyclone (CY-4 and CY-5) for the presence of greater than normal visible emissions, as determined by previous observations.</p> <p>(b) Whenever observed visible emissions are greater than normal from the cyclone(s), 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 visible 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 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 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>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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> <ul style="list-style-type: none"> <li>(i) The date, time, and results of each observation for visible emissions;</li> <li>(ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and</li> <li>(iii) The date(s) and time the cyclones were 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.</li> </ul> <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 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(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;</li> </ul>	<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 each cyclone 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 cyclone(s) indicated that cleaning or emission-related maintenance was needed.</p>	

## Provisos for Facility-Wide Fugitive Dust

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></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><b>2. <u>Emission Standards</u></b></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><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>The Permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p> <p><b>4. <u>Emissions Monitoring</u></b></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><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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**

East Alabama Lumber Company, Inc.

302-S003

Fugitive Dust Management Plan

# **Fugitive Dust Control Plan**

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**EAST ALABAMA LUMBER COMPANY  
15204 U.S. Highway 431  
Lafayette, Alabama 36862**

**July 2024**



**1900 Crestwood Blvd., Suite 114  
Birmingham, Alabama 35210**

**Phone (205) 951-3700**

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## **1.0 Introduction**

Fugitive dust is particulate matter resulting from industrial activities generated in the open air (e.g., not through a stack). It includes both visible and non-visible particulate matter.

The Alabama Department of Environmental Management (ADEM) regulates fugitive dust pursuant to Alabama Code of Admin. Rule 335-3-4-.02, *Fugitive Dust*. This rule states that “no person shall cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

## **2.0 Health and Environmental Impacts**

Fugitive dust is an air pollutant that can be generated during activities such as sawmill operations. Not only is dust a hazard to workers, it is a hazard to the public and affects the environment.

### **2.1 Health Hazards**

Fine dust inhaled deep into the lungs has been linked to a variety of health problems, ranging from nose and throat irritation to respiratory illnesses, such as bronchitis, lung-damage, and asthma. The silica in dust has been shown to cause silicosis, chronic obstructive pulmonary disease, and renal disease.

### **2.2 Environmental Hazards**

Dust can migrate into nearby surface water, where it affects aquatic communities and contributes to the nutrient loading of the surface water ecosystem. Additionally, fugitive dust that settles on nearby vegetation can weaken or kill the vegetation.

Wind generation of dust particles can cause the erosion of valuable topsoil and contribute to the soiling and discoloration of personal property.

## **3.0 Plan Objectives**

The Fugitive Dust Control Plan identifies control measures and practices to minimize and control fugitive dust. The plan defines the ways in which personnel and subcontractors will mitigate dust emissions at the plant.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies potential fugitive dust sources at the facility



- Identifies control measures and practices to control and minimize fugitive dust
- Identifies fugitive dust control record keeping requirements
- Identifies fugitive dust control notification requirements

#### **4.0 Facility Operations**

Incoming logs are conveyed to a sawmill where they are debarked and cut to length. Emissions from the operation are fugitive. Collected wood waste is pneumatically conveyed to a cyclone located over the fuel feed bins for Dry Kiln #1 and Dry Kiln #2.

Lumber from the sawmill is stacked, and then dried in the existing 174,000 bf and 184,000 bf dry kilns. Emissions from the kilns are uncontrolled.

Kiln dried lumber is transported to the planer mill for further processing. Wood waste from the planer mill is conveyed to a dual cyclone system (Cyclones #4 and #5), in parallel. Wood waste is dropped into a storage bin and transported off-site. Lumber from the planer mill is stored and transported off-site.

The facility location map is shown as Figure 1.

#### **5.0 Fugitive Dust Sources and Controls**

Potential sources of fugitive dust include the following: Sawmill Operations, Boiler Fuel Storage, Planer Mill Operations, Shavings Bin Loadout, Access Roads, and Log Yard.

##### **5.1 Sawmill Operations**

###### **5.1.1 Activities**

Debarking at Sawing Operations occurs within a building. Sawdust is pneumatically conveyed to the fuel house, via cyclones. Because of the particle size, wood waste from the sawmill is not considered to be a significant source of fugitive dust.

###### **5.1.2 Precautions**

If necessary, keep sawmill area wet, by using water sprays, to prevent windblown emissions.



## **5.2 Boiler Fuel Storage**

### **5.2.1 Activities**

Incoming sawdust, shavings, etc. is pneumatically blown into the fuel house, which is enclosed. The chances of fugitive dust is minimal.

### **5.2.2 Precautions**

Keep fuel piles within the confines of the fuel house to avoid windblown emissions of particulate matter.

## **5.3 Planer Mill**

### **5.3.1 Activities**

Finishing Operations occur within the confines of a building structure. The potential for fugitive dust generation is minimal.

### **5.3.2 Precautions**

If necessary, keep planer mill area wet, by using water sprays to prevent windblown emissions.

## **5.4 Shavings Bin Loadout**

### **5.4.1 Activities**

Loadout of shavings from the bin to the truck is a source of fugitive dust.

### **5.4.2 Precaution**

Maintain low drop heights for material handling activities. Install and maintain dust curtains around material transfer points, such as vehicle loading stations, to reduce air movement and isolate dust forming operations.



## **5.5 Access Roads**

### **5.5.1 Activities**

Drag-out tracks from log yard access onto the access roads can contribute to the formation of fugitive dust.

### **5.5.2 Precautions**

Weekly cleaning of the access roads using a mechanical sweeper. Limit vehicle speeds to 10 mph.

## **5.6 Log Yard**

### **5.6.1 Activities**

Fugitive dust is generated from loaders and haul trucks traveling through the log yard.

### **5.6.2 Precautions**

Utilize water trucks to prevent fugitive dust from being airborne on as needed basis. Limit vehicle speeds to 5 mph.

## **6.0 Inspections**

In order to assure that the fugitive dust control measures outlined in this Plan are implemented and effective, they will be assessed in the monthly inspection. If all procedures are being conducted as outlined in this Plan, this will be noted accordingly on the inspection form. If repairs are required or process improvements can be made, this will be noted on the inspection form and a timeline for repairs and improvements will be outlined. Inspections will be performed by Rachel Eden, Office Manager, or her designee.

The inspection form is enclosed as Attachment A.

## **7.0 Training**

Training is a critical component to the fugitive dust control plan. Training will include a review of the work activities and job site conditions that create dust, proper use of equipment and best management practices to prevent and control dust, and when to take corrective action. All employees will be trained annually.

## **8.0 Recordkeeping/Reporting**

All inspection records will be kept in the Planer Mill office and will be made available to ADEM upon request. All records will be kept for a minimum of five (5) years.

## **9.0 Record of Revisions and Updates**

This Fugitive Dust Control Plan will be assessed annually. As part of the assessment, all processes and procedures will be reviewed for their effectiveness and efficiency at minimizing or eliminating the generation of fugitive dust. If any new measures have been implemented during the year, these will be incorporated into the plan.

The record is enclosed as Attachment B.

## **Attachment A**

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### **Inspection Log**

## Fugitive Dust Site Inspection Form

Inspection Criteria	Observations	Follow-Up Action	Status	Inspection Initials
Is visible dust observed?				
Is facility well maintained (i.e., good housekeeping, area cleaned up?)				
Are proper control measures used (e.g., sweeper, water truck, etc.)?				
Are vehicles moving below speed limit?				
Are appropriate haul sizes maintained on haul vehicles (if applicable)?				
Are storage pile heights maintained below level of windbreak (if applicable)?				
Are low drop heights maintained for material handling activity?				

## **Attachment B**

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### **Record of Revisions and Updates**



## Record of Revisions and Updates

[illegible]