

Alabama Department of Environmental Management adem.alabama.gov

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May 21, 2025

Mr. Ben Benedict Plant Manager Georgia-Pacific Wood Products LLC 400 Ironaton Cutoff Road Talladega, AL 35160

RE: **Major Source Operating Permit Renewal**

Birmingham Office

110 Vulcan Road

(205) 942-6168

(205) 941-1603 (FAX)

Georgia-Pacific Wood Products LLC - Talladega Lumber

Facility/Permit No. 309-0075

Dear Mr. Benedict:

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 May 28, 2025, and your current MSOP will expire on May 27, 2025.

This renewal MSOP has a term of five (5) years and will expire on May 27, 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	Reportin	g Periods	Due Dete
	From	To	Due Date
1	May 28, 2025	May 27, 2026	July 26, 2026
2	May 28, 2026	May 27, 2027	July 26, 2027
3	May 28, 2027	May 27, 2028	July 26, 2028
4	May 28, 2028	May 27, 2029	July 26, 2029
5	May 28, 2029	May 27, 2030	July 26, 2030



Semiannual Monitoring Reports			
D:4 X/	Reportin	g Periods	Des Data
Permit Year	From	To	Due Date
1	May 28, 2025	November 27, 2025	January 26, 2026
1	November 28, 2025	May 27, 2026	July 26, 2026
2	May 28, 2026	November 27, 2026	January 26, 2027
Δ	November 28, 2026	May 27, 2027	July 26, 2027
3	May 28, 2027	November 27, 2027	January 26, 2028
3	November 28, 2027	May 27, 2028	July 26, 2028
1	May 28, 2028	November 27, 2028	January 26, 2029
4	November 28, 2028	May 27, 2029	July 26, 2029
5	May 28, 2029	November 27, 2029	January 26, 2030
5	November 28, 2029	May 27, 2030	July 26, 2030

Please also note that the final Annual Compliance Certification for the period of May 28, 2024, through May 27, 2025, and the final Semiannual Monitoring Report for the period of November 28, 2024, through May 27, 2025, for the current MSOP should be submitted to the Air Division no later than **July 26, 2025**. 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:

GEORGIA-PACIFIC WOOD PRODUCTS LLC

FACILITY NAME:

TALLADEGA LUMBER MILL

FACILITY/PERMIT NO.:

309-0075

LOCATION:

TALLADEGA, TALLADEGA COUNTY, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, <u>Ala. Code</u> §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, <u>Ala. Code</u> §§ 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:

May 21, 2025

Effective Date:

May 28, 2025

Expiration Date:

May 27, 2030

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TABLE OF CONTENTS

GENE	RAL PERMIT PROVISOS	1
1.	Transfer	1
2.	Renewals	
3.	Severability Clause	
4.	Compliance	
5.	Termination for Cause	
6.	Property Rights	
7.	Submission of Information	
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
9.	Certification of Truth, Accuracy, and Completeness	
10.	Inspection and Entry	
11.	Compliance Provisions	
12.	Compliance Certification	
13.	Reopening for Cause	
14.	Additional Rules and Regulations	
15.	Equipment Maintenance or Breakdown	
16.	Operation of Capture and Control Devices	
17.	Obnoxious Odors	
18.	Fugitive Dust	6
19.	Additions and Revisions	
20.	Recordkeeping Requirements	7
21.	Reporting Requirements	
22.	Emission Testing Requirements	7
23.	Payment of Emission Fees	8
24.	Other Reporting and Testing Requirements	9
25.	Title VI Requirements (Refrigerants)	9
26.	Chemical Accidental Prevention Provisions	9
27.	Display of Permit	0
28.	<u>Circumvention</u>	10
29.	<u>Visible Emissions</u>	10
30.	Fuel-Burning Equipment	10
31.	Process Industries – General	10
32.	Averaging Time for Emission Limits	10
33.	Open Burning	11
34.	Permit Shield	11
EMIS	SION UNIT NO. 001 (SAWMILL AND GREEN END OPERATIONS)	12
Sun	nmary Page	12
	t Specific Provisos	
	Applicability	
	Emission Standards	
	Emission Monitoring.	

5.	Recordkeeping and Reporting Requirements.	14
EMISS	SION UNIT NO. 002 (CONTINUOUS DRYING KILN NOS. 1-3)	16
Sum	mary Page	16
Unit	Specific Provisos	17
	Applicability	
	Emission Standards	
3.	Compliance and Performance Test Methods and Procedures	17
	Emission Monitoring	
5.	Recordkeeping and Reporting Requirements	18
EMIS	SION UNIT NO. 003 (PLANER MILL AND FINISHED END OPERATIONS)	20
Sur	nmary Page	20
	Specific Provisos	
1.	Applicability	21
	Emission Standards	
	Compliance and Performance Test Methods and Procedures	
4.	Emission Monitoring.	22
5.	Recordkeeping and Reporting Requirements	22
EMIS	SION UNIT NO. 004-1 (EMERGENCY FIRE PUMP ENGINE)	24
Sun	nmary Page	24
Unit	Specific Provisos	25
	Applicability	
2.	Emission Standards	25
3.	Compliance and Performance Test Methods and Procedures	26
4.	Emission Monitoring.	26
5.	Recordkeeping and Reporting Requirements	26
PROV	ISOS FOR FACILITY-WIDE FUGITIVE DUST	28
1	Applicability	28
	Emission Standards	
	Compliance and Performance Test Methods and Procedures	
4.	Emissions Monitoring	28
	Recordkeeping and Reporting Requirements	
, ppr	NDIX A	29

	Federally Enforceable Provisos	Regulations
1.	Transfer	
	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. 335-3-1613(1)(a)5.	ADEM Admin. Code r. 335-3-1602(6)
2.	Renewals	
	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.	ADEM Admin. Code r. 335-3-1612(2)
	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.	
3.	Severability Clause	
	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.	ADEM Admin. Code r. 335-3-1605(e)
4.	Compliance	
	(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.	ADEM Admin. Code r. 335-3-1605(f)
	(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.	ADEM Admin. Code r. 335-3-1605(g)

	Federally Enforceable Provisos	Regulations
5.	Termination for Cause	
	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.	ADEM Admin. Code r. 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code r. 335-3-1605(i)
7.	Submission of Information	
	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.	ADEM Admin. Code r. 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions <u>Trading</u>	
	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.	ADEM Admin. Code r. 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness	
	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.	ADEM Admin. Code r. 335-3-1607(a)
10	. Inspection and Entry	
	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:	ADEM Admin. Code r. 335-3-1607(b)

	Federally Enforceable Provisos	Regulations
((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.	
11.9	Compliance Provisions	
	(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.	
12.	Compliance Certification	
	The permittee shall submit a complete and accurate compliance certification by July 26 th of each year for each annual reporting period of this permit (May 28 th – May 27 th).	
	(a) The compliance certification shall include the following:	
	(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. 335-3-1605(c (Monitoring and Recordkeeping Requirements);	1
	(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;	

Federally Enforceable Provisos Regulations (b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: EPA Region 4 via email at EPA R4 CAA Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI) 13. Reopening for Cause Under any of the following circumstances, this permit will be ADEM Admin. Code r. reopened prior to the expiration of the permit: 335-3-16-.13(5) (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. 14. Additional Rules and Regulations This permit is issued on the basis of Rules and Regulations §22-28-16(d), Code of existing on the date of issuance. In the event additional Rules Alabama 1975, as and Regulations are adopted, it shall be the permit holder's amended responsibility to comply with such rules.

Federally Enforceable Provisos	Regulations
15. Equipment Maintenance or Breakdown	
 (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: (1) Identification of the specific facility to be taken out of service as well as its location and permit number; 	ADEM Admin. Code r. 335-3-107(1),(2)
(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.	
(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.	
16. Operation of Capture and Control Devices	
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.	§22-28-16(d), <u>Code of</u> <u>Alabama 1975</u> , as amended

Federally Enforceable Provisos	Regulations
17. Obnoxious Odors	
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.	ADEM Admin. Code r. 335-3-108
18. Fugitive Dust	
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code r. 335-3-402
(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:	
(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.	
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.	
19. Additions and Revisions	
Any modifications to this source shall comply with the modification procedures in Rules 335-3-1613 or 335-3-1614.	ADEM Admin. Code r. 335-3-1613 and 335-3-1614

	Federally Enforceable Provisos	Regulations
20. <u>Re</u>	cordkeeping Requirements	
(a)	Records of required monitoring information of the source shall include the following:	ADEM Admin. Code r. 335-3-1605(c)2.
	(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.	
(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.	
21. <u>Re</u>	porting Requirements	
(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. 335-3-1604(9).	ADEM Admin. Code r 335-3-1605(c)3.
(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.	
22. <u>Er</u>	nission Testing Requirements	
wi eq pr	ch point of emission which requires testing shall be provided th sampling ports, ladders, platforms, and other safety uipment to facilitate testing performed in accordance with occdures established by Part 60 of Title 40 of the Code of deral Regulations, as the same may be amended or revised.	ADEM Admin. Code r 335-3-105(3) and 335-3-104(1)

Federally Enforceable Provisos	Regulations
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.	
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	ADEM Admin. Code r. 335-3-104
(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.	
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.	ADEM Admin. Code r. 335-3-104
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.	
23. Payment of Emission Fees	
(a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-704 according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code r. 335-1-705
(b) The permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-705.	ADEM Admin. Code r. 335-1-705

Federally Enforceable Provisos	Regulations
24. Other Reporting and Testing Requirements	
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.	ADEM Admin. Code r. 335-3-104(1)
25. Title VI Requirements (Refrigerants)	
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.	ADEM Admin. Code r. 335-3-1605(a)
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.	
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.	
26. Chemical Accidental Prevention Provisions	
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:	40 CFR Part 68
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.	
(b) The owner or operator shall submit one of the following:	
(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a) or,	
(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	

Federally Enforceable Provisos	Regulations
27. Display of Permit	
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.	ADEM Admin. Code r. 335-3-1602(2)
28. <u>Circumvention</u>	
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.	ADEM Admin. Code r. 335-3-110
29. Visible Emissions	
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.	ADEM Admin. Code r 335-3-401(1)
30. Fuel-Burning Equipment	
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. 335-3-403.	ADEM Admin. Code r 335-3-403
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. 335-3-501.	ADEM Admin. Code r 335-3-501
31. Process Industries - General	
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. 335-3-404.	ADEM Admin. Code r 335-3-404
32. Averaging Time for Emission Limits	
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.	ADEM Admin. Code r 335-3-105

Federally Enforceable Provisos	Regulations
33. Open Burning	
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. 34. Permit Shield	ADEM Admin. Code r. 335-3-301
A Permit Shield exists under this operating permit in accordance with ADEM Admin. Code r. 335-3-1610 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.	ADEM Admin. Code r. 335-3-1610

Emission Unit No. 001 (Sawmill and Green End Operations) **Summary Page**

Description:

Log Debarking; Log Bucking; Sawmill; Chip Conveyance; Bark

Conveyance; Chip Pile; Sawdust Conveyance; Chip Cyclone; Mobile

Grinder; and Haul Roads

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation	
LD	Log Debarking	PM			
LB	Log Bucking				
SM	Sawmill				
СС	Chip Conveyance		PM	$E = 3.59(P)^{0.62}$ for P<30 TPH	ADEM Admin, Code r.
ВС	Bark Conveyance		Or E = 17.31(P) ^{0.16}	335-3-404	
СР	Chip Pile		for P≥30 TPH		
SDC	Sawdust Conveyance				
MG	Mobile Grinder				
RD	Haul Roads				
		PM	0.66 lb/hr	ADEM Admin. Code r. 335-3-1404	
СНС	Chip Cyclone		Operating limit of 6,200 hours during any consecutive 12-month period	ADEM Admin. Code r 335-3-1404	

Emission Unit No. 001 (Sawmill and Green End Operations) Unit Specific Provisos

r	Federally Enforceable Provisos	Regulations
1.	Applicability	
	These processes are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
2.	Emission Standards	
	(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each process in excess of the amount determined by the following equations:	ADEM Admin. Code r. 335-3-404
	$E = 3.59 P^{0.62}$ (P < 30 TPH)	
	Or	
	$E = 17.31 \ P^{0.16} \ (P \ge 30 \ \text{TPH})$	
	Where E = Emissions in pounds per hour P = Process weight in tons per hour	
	(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.	ADEM Admin. Code. r. 335-3-401(1)
	(c) The permittee shall not cause or allow the particulate matter emission rate from the cyclone exhaust (CHC) to exceed 0.66 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1404
	(d) The permittee shall not operate the chipper cyclone (CHC) more than 6,200 hours during any consecutive 12-month period.	ADEM Admin Code r. 335-3-1404
3.	Compliance and Performance Test Methods and Procedures	
	(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.	ADEM Admin. Code r. 335-3-105
	(b) If testing is required, the visible emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105

	Federally Enforceable Provisos	Regulations
	(c) 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 or 25A.	ADEM Admin. Code r. 335-3-105
	(d) 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.	ADEM Admin. Code r. 335-3-105
4.	Emission Monitoring	
	(a) Within 10 days of the end of each calendar month, the permittee shall calculate the total operating hours of the chipper cyclone (CHC) for the previous month and previous consecutive 12-month period and determine compliance with the operating hour limitation.	ADEM Admin. Code r. 335-3-1605(c)
	(b) At least weekly during daylight hours, while each process is operating, permittee personnel familiar with each operation shall perform an instantaneous check of each process for the presence of greater than normal visible emissions.	ADEM Admin. Code r. 335-3-1605(c)
	(c) Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.	ADEM Admin. Code r. 335-3-1605(c)
	(d) The cyclone shall be physically inspected for proper operation and cleaned, if needed, at least annually, but more frequently if visible emissions are observed.	
5.	Recordkeeping and Reporting Requirements	
	(a) The permittee shall maintain records of the hours of operation for the chipper cyclone (CHC) on a monthly and 12-month rolling total basis. These records shall be calculated within 10 days of the end of each month and kept readily available on-site in a permanent form suitable for inspection for a period of five years from the date of generation.	ADEM Admin. Code r. 335-3-1605(c)
	(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.	ADEM Admin. Code r. 335-3-1605(c)

Federally Enforceable Provisos

Regulations

(c) 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:

ADEM Admin. Code r. 335-3-16-.05(c)

- (i) The date, time, and results of each observation for visible emissions;
- (ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and
- (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.
- (d) 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 (May 28th November 27th and November 28th May 27th). The report shall include the following information for this emission unit:

ADEM Admin. Code r. 335-3-16-.05(c)

- (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;
- (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 the inspection;
- (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.

Emission Unit No. 002 (Continuous Drying Kiln Nos. 1-3) Summary Page

Description: Two 120 MMBf/yr Continuous Dry Kilns each with a 40 MMBtu/hr

Natural Gas-fired Burner, and One 80 MMBf/yr Continuous Dry Kiln

with a 30 MMBtu/hr Natural Gas-fired Burner

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation	
CDK-1	Continuous Dry Kiln No. 1	PM	E = $3.59(P)^{0.62}$ for P<30 TPH Or E = $17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r. 335-3-404	
CDK-2	Continuous Dry Kiln No. 2	A 414	0.33 lb/hr, each	ADEM Admin. Code r 335-3-1404	
CDK-1	Continuous Dry Kiln No. 1	VOC	5.49 lb/MBF as WPP1 VOC,	ADEM Admin. Code r	
CDK-2	Continuous Dry Kiln No. 2	VOC	each	335-3-1404	
CDK-1	Continuous Dry Kiln No. 1	50	4.0 lb/MMDtv. boot immyt oogb	ADEM Admin. Code r	
CDK-2	Continuous Dry Kiln No. 2	SO ₂	4.0 lb/MMBtu heat input, each	335-3-501	
			PM	E = $3.59(P)^{0.62}$ for P<30 TPH Or E = $17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r 335-3-404
			0.23 lb/hr	ADEM Admin. Code r 335-3-1404	
CDK-3	Continuous Dry Kiln No. 3	VOC	5.49 lb/MBF as WPP1 VOC	ADEM Admin. Code r 335-3-1404	
		SO ₂	4.0 lb/MMBtu heat input	ADEM Admin. Code 1 335-3-501	

Emission Unit No. 002 (Continuous Drying Kiln Nos. 1-3) Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
L. <u>.</u>	Applicability	
	(a) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code 1 335-3-1603
	(b) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))".	ADEM Admin. Code 1 335-3-1404
	(c) These units are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR Part 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD.	ADEM Admin. Code: 335-3-1106(81); an 40 CFR Part 63, Subpart DDDD
	Emission Standards	
	(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each unit in excess of the amount determined by the following equations:	ADEM Admin. Code 335-3-404
	$E = 3.59 P^{0.62}$ (P < 30 TPH)	
	Or	
	$E = 17.31 \ P^{0.16} \ (P \ge 30 \ \text{TPH})$	
	Where $E =$ Emissions in pounds per hour $P =$ Process weight in tons per hour	
	(b) The permittee shall not cause or allow the particulate matter emission rate from kilns 1, 2, or 3 (Emission Sources CDK1, CDK2, and CDK3) to exceed 0.33 lb/hr, 0.33 lb/hr, and 0.23 lb/hr, respectively, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin Code r 335-3-1404
	(c) The permittee shall not cause or allow the VOC emissions from the kilns to exceed 5.49 lb/MBF each as WPP1 VOC.	ADEM Admin Code 1 335-3-1404
3.	Compliance and Performance Test Methods and Procedures	
	(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.	ADEM Admin. Code 335-3-105

		Federally Enforceable Provisos	Regulations
	(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 or 25A.	ADEM Admin. Code r. 335-3-105
	(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.	ADEM Admin. Code r. 335-3-105
4.	Em	ission Monitoring	
	(a)	The Permittee shall measure and record the moisture content of the lumber as it exits the planer machine. The 12-month rolling average moisture content shall be $\geq 12\%$.	ADEM Admin. Code r. 335-3-1404
	(b)	Within 10 days of the end of each calendar month, the permittee shall calculate the total combined production for Continuous Dry Kiln Nos. 1 through 3 for the previous calendar month and previous 12-month period.	ADEM Admin. Code r. 335-3-1605(c)
	(c)	The permittee shall use proper maintenance and operating practices for the Continuous Dry Kiln Nos. 1 through 3 in accordance with the facility's developed maintenance plan for the kilns.	ADEM Admin. Code r. 335-3-1605(c)
5.	Re	cordkeeping and Reporting Requirements	
	(a)	The permittee shall maintain records of the average monthly and 12-month rolling average lumber moisture content. 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.	ADEM Admin. Code r. 335-3-1605(c)
	(b)	The permittee shall maintain records documenting its compliance with the facility-developed kiln maintenance plan.	ADEM Admin. Code r. 335-3-1404
	(c)	The permittee shall maintain records of the combined production for Continuous Dry Kiln Nos. 1 through 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	ADEM Admin. Code r. 335-3-1605(c)

Federally Enforceable Provisos	Regulations
(d) Should any 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.	ADEM Admin. Code r. 335-3-1605(c)
(e) 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 (May 28th – November 27th and November 28th – May 27th). 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.	ADEM Admin. Code r. 335-3-1605(c)

Emission Unit No. 003 (Planer Mill and Finished End Operations) Summary Page

Description: Planer Mill with Cyclofilter; and Shavings Conveyance

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
		PM	E = $3.59(P)^{0.62}$ for P<30 TPH Or E = $17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r. 335-3-404
PM	Planer Mill Cyclofilter		1.01 lb/hr	ADEM Admin. Code r. 335-3-1404
			Operating limit of 6,200 hours during any consecutive 12- month period	ADEM Admin. Code r. 335-3-1404
SC	Shavings Conveyance	PM	E = $3.59(P)^{0.62}$ for P<30 TPH Or E = $17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r. 335-3-404

Emission Unit No. 003 (Planer Mill and Finished End Operations) Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	These processes are subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
3.	Emission Standards	
	(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:	ADEM Admin. Code r. 335-3-404
	$E = 3.59 \ P^{0.62} \ (P < 30 \ \text{TPH})$	
	Or $E = 17.31 \ P^{0.16} \ (P \ge 30 \ \text{TPH})$	
	Where $E = \text{Emissions in pounds per hour}$ $P = \text{Process weight in tons per hour}$	
	(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.	ADEM Admin. Code. r. 335-3-401(1)
	(c) The permittee shall not cause or allow the particulate matter emission rate from the cyclofilter exhaust (PM) to exceed 1.01 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1404
	(d) The permittee shall not operate the cyclofilter more than 6,200 hours during any consecutive 12-month period.	ADEM Admin Code r. 335-3-1404
3.	Compliance and Performance Test Methods and Procedures	
	(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.	ADEM Admin. Code r. 335-3-105
	(b) If testing is required, the visible emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105
	(c) 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 or 25A.	ADEM Admin. Code r. 335-3-105

		Federally Enforceable Provisos	Regulations
		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.	ADEM Admin. Code r. 335-3-105
4.	Em	ission Monitoring	
	(a)	Within 10 days of the end of each calendar month, the permittee shall calculate the total operating hours for the previous month and previous consecutive 12-month period and determine compliance with the operating hour limitation.	ADEM Admin. Code r. 335-3-1605(c)
	(b)	At least weekly during daylight hours, while each process is operating, permittee personnel familiar with each operation shall perform an instantaneous check of each process for the presence of greater than normal visible emissions.	ADEM Admin. Code r. 335-3-1605(c)
	(c)	Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.	ADEM Admin. Code r. 335-3-1605(c)
	(d)	The cyclofilter shall be physically inspected for proper operation and cleaned, if needed, at least annually, but more frequently if visible emissions are observed.	ADEM Admin. Code r. 335-3-1605(c)
5.	Red	cordkeeping and Reporting Requirements	
	(a)	The permittee shall maintain records of the hours of operation for the planer mill cyclofilter (PM) on a monthly and 12-month rolling total basis. These records shall be calculated within 10 days of the end of each month and kept readily available on-site in a permanent form suitable for inspection for a period of five years from the date of generation.	ADEM Admin. Code r. 335-3-1605(c)
	(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.	ADEM Admin. Code r. 335-3-1605(c)

Federally Enforceable Provisos

Regulations

(c) 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:

ADEM Admin. Code r. 335-3-16-.05(c)

- (i) The date, time, and results of each observation for visible emissions;
- (ii) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and
- (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.
- (e) 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 (May 28th November 27th and November 28th May 27th). The report shall include the following information for this emission unit:

ADEM Admin. Code r. 335-3-16-.05(c)

- (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;
- (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 the inspection;
- (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.

Emission Unit No. 004-1 (Emergency Fire Pump Engine) **Summary Page**

Description:

247 bHp Cummins Emergency Diesel-fired Reciprocating Internal

Combustion Engine

Permitted Operating Schedule: 500 hours/ year

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
FE	Emergency Fire Pump Engine	PM	0.20 g/kW-hr (0.15 g/HP-hr)	40 CFR §60.4205(c)
		NOx + HC	4.0 g/kW-hr (3.0 g/HP-hr)	

Emission Unit No. 004-1 (Emergency Fire Pump Engine) Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	Applicability		
	(a)	This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(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.	ADEM Admin. Code r. 335-3-1106(103); 40 CFR Part 63, Subpart ZZZZ
	(c)	This unit is subject to the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.	ADEM Admin. Code r. 335-3-1002(87)
	(d)	This unit is subject to the General Provisions 40 CFR §60.1 through §60.19 (as applicable) as outlined in Table 8 to 40 CFR Part 60, Subpart IIII.	ADEM Admin. Code r. 335-3-1002(87); 40 CFR §60.4218
2.	Em	uission Standards	
	(a)	The permittee shall not cause or allow the engine to operate more than 500 hours during any consecutive 12-month period.	ADEM Admin. Code r. 335-3-1404
	(b)	The permittee shall not cause or allow the emissions from this unit to exceed the applicable emission standards in Table 4 to Subpart IIII, specifically:	40 CFR §60.4205(c)
		(i) The sum of the emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NOx) shall not exceed 4.0 g/kW-hr (3.0 g/HP-hr);	
		(ii) Particulate matter (PM) emissions shall not exceed 0.30 g/kW-hr (0.22 g/HP-hr).	
	(c)	The Permittee shall not burn any diesel fuel from this unit that does not meet the following per-gallon standards of 40 CFR §1090.305:	40 CFR §60.4207
		(i) Sulfur content shall not exceed 15 parts per million (ppm); and	
		(ii) Cetane index shall be a minimum of 40 or the aromatic content shall not exceed 35 volume percent.	

	Federally Enforceable Provisos	Regulations
	(d) The permittee shall only operate this unit as specified below:	40 CFR §60.4211(f)
	(i) Emergency situations;	
	(ii) Maintenance checks and readiness testing, not to exceed 100 hours per year; and	
	(iii) 50 hours per year during non-emergency situations provided the non-emergency utilization hours are counted towards the 100 hours per year provided for maintenance and readiness testing.	
3.	Compliance and Performance Test Methods and Procedures	
	There are no applicable performance test methods or procedures associated with this unit.	
4.	Emission Monitoring	
	(a) The permittee shall operate and maintain this unit according to the manufacturer's written instructions over the life of the engine.	40 CFR §60.4206 and §60.4211(a)
	(b) The permittee shall install and operate a non-resettable hour meter on this unit.	40 CFR §60.4209
5.	Recordkeeping and Reporting Requirements	
	(a) To demonstrate compliance with the operational limitations, the permittee shall maintain records of the date, time, duration, and purpose of operation each time this unit 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 5 years from the date of generation of each record.	ADEM Admin. Code r. 335-3-1605(c) and 40 CFR §60.4214(b)
	(b) To demonstrate compliance with the 500-hour maximum operation limit, the permittee shall maintain the following records:	ADEM Admin. Code r. 335-3-1605(c)
	(i) Within 20 days of the end of each calendar month, the permittee shall calculate and record the monthly and 12-month rolling total hours of operation for the engine for the previous month and 12-month period;	
	(ii) The permittee shall maintain records of the monthly and 12-month rolling total hours of operation for the engine in a permanent format suitable for inspection and shall make the records readily available for the inspection upon request. The permittee shall maintain these records for a period of 5 years from the generation of each record.	

Federally Enforceable Provisos	Regulations
(iii) Should the permittee exceed the operational limit for any engine, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.	
(c) To demonstrate compliance with the fuel limitations, the permittee shall maintain records of the sulfur content and fuel delivery receipts of the diesel fuel that is burned in this unit. These records shall be maintained in a permanent form and submitted upon request. Records demonstrating that the fuel limitation requirements are being met shall be maintained onsite and readily available for inspection upon request. All records shall be retained for a period of 5 years from the date of generation of each record.	ADEM Admin. Code r. 335-3-1605(c)
(d) The permittee shall submit a Semiannual Monitoring Report to the Air Division no later than 60 days after the end of each semiannual reporting period May 28th – November 27th and November 28th – May 27th). This report shall include:	ADEM Admin. Code r. 335-3-1605
(i) A statement as to whether all emission observations were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;	
(ii) The date(s), time, duration, and cause of any excursions from a monitoring parameter; and	
(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken (including cleaning).	

Provisos for Facility-Wide Fugitive Dust

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
2.	Emission Standards	
	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.	ADEM Admin. Code r. 335-3-402
3.	Compliance and Performance Test Methods and Procedures	
	The Permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.	ADEM Admin. Code r. 335-3-1607
4.	Emissions Monitoring	
	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.	ADEM Admin. Code r. 335-3-1605
5.	Recordkeeping and Reporting Requirements	
	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.	ADEM Admin. Code r. 335-3-1605

Appendix A

Georgia-Pacific Wood Products LLC
Talladega Lumber Mill
309-0075

Fugitive Dust Management Plan

Fugitive Emissions Control Plan

The Georgia-Pacific Wood Products LLC (GP) Talladega Lumber Mill will take reasonable precautions to prevent excessive emissions of fugitive particulate matter onsite. The primary sources of fugitive particulate matter include vehicular traffic and material handling. Fugitive particulate emissions are evaluated through observed opacity. The measures outlined below will be employed to prevent nuisance dust from leaving the site to comply with permitted opacity limits.

Vehicular Traffic

The roads subject to routine vehicular traffic at the Talladega Lumber Mill are paved, except for an overflow log storage area. The Mill will maintain the paved roads and will conduct regular inspections to ensure paved areas do not accumulate an excess of dirt or wood refuse. Should roads or other paved areas generate excess fugitive emissions, the Mill will promptly clean the affected area as needed. Records of observations and cleaning operations will be maintained onsite and retained for five years from the date of generation.

The roads in the overflow log storage area are maintained using chemical dust suppression. The Mill will regularly apply dust suppressant to this area as needed. Records of dust suppression applications will be maintained onsite and retained for five years from the date of generation.

Material Handling

Processing residuals and byproducts, such as bark, shavings, and sawdust, are generated onsite. The Talladega Lumber Mill will maintain material handling equipment including any associated coverings and enclosures to prevent excess airborne particulate emissions.

Should greater than normal emissions occur, the Mill will evaluate the source of the emissions and employ corrective actions within 24 hours of observation. Records of excess fugitive emission observations and associated corrective actions will be maintained onsite and retained for five years since the date of generation.