

Engineering Analysis
Alabama Inter-Forest
Facility Number 601-0023

On December 17, 2015, the Department received an application from Alabama Inter-Forest to replace their Major Source Operating Permit with a Synthetic Minor Operating Permit. The Standard Industrial Classification for this facility is 2541, wood office and store fixtures. Alabama Inter-Forest is in three buildings on Industrial Drive in Eufaula.

Emissions

Two of the buildings have wood working shops to cut and shape wood components. The center building has two panel coating lines and one laminating line. Alabama Inter-Forest has changed to water based coating, which has reduced the air emissions from the coating lines. Air emissions from this facility were reported to be 3.7 tons of Volatile Organic Compounds and 0.1 tons of Hazardous Air Pollutants for the twelve month period ending December 2015. Potential air emissions from this facility are estimated to be 41 tons per year of VOC and 3.6 tons per year of HAPs. Alabama Inter-Forest has requested synthetic minor permit limits of 95 tons of VOC, 24 tons of HAPs, and 9 tons of any single HAP in any 12 month period. Sawdust from the wood working equipment is pneumatically conveyed to dumpsters. Particulate emissions from this process are controlled by three baghouses. A fourth baghouse is used to collect dust from sanding the wood panels on the two coating lines. The following table summarizes emissions from the panel line baghouse (1), the two baghouses in fab shop one (2), and the baghouse for fab shop three (3).

	Process rate Tons/hour	allowable lb/hour	uncontrolled lb/hour	actual lb/hour
1	17.9	21.5	10	0.01
2	12	16.8	1136	1.1
3	6	10.9	474	0.47

The permit will limit each baghouse to 3 pounds per hour of particulate. The panel coating lines use electric heat.

NSPS / NESHAP / MACT

Since the facility changed its coating formulations, it is now a minor source of HAPs. As a minor source, this facility is not subject to the National Emissions Standards for Wood Furniture Manufacturing Operations, 40 CFR 63 subpart JJ. The baghouses are subject to the Compliance Assurance Monitoring requirements of 40 CFR 64. Alabama Inter-Forest will continue to monitor the baghouse pressure differential daily to assure proper operation of these units. This facility is not currently subject to other federal air standards.

State Regulations

The baghouses are subject to the opacity standards of ADEM Admin. Code R. 335-3-4-.01, and the process weight limits of ADEM Admin. Code R. 335-3-4-.04. The baghouses should more than meet these standards if properly maintained.

PSD

Alabama Inter-Forest has not been a significant source for the Prevention of Significant Deterioration because the Major Source Operating Permit limited VOC emission to 245 tons in any twelve month period. This facility will continue to be a minor source for PSD.

Air Toxics

Air toxics were not modeled because no air toxic is expected to be emitted at a rate greater than 0.1 pounds per hour.

Class I Area

Eufaula is more than 100 kilometers from any class I area. The low air emission rate from this facility should not significantly affect the air quality in any class I area.

Reporting and Recordkeeping

This facility will continue to keep records of VOC and HAP emissions, and report these to the Department quarterly. Records of the daily baghouse check will be kept on site and reviewed during inspections.

Recommendations

Since it appears that this facility would be capable of meeting all applicable state and federal regulations, I recommend that the attached draft permit be issued to Alabama Inter-Forest, pending receipt of their permit fees and the public notice.

Hal Brock
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