



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: KNUD NIELSEN COMPANY, INC.

FACILITY/PERMIT NO.: 103-0010

LOCATION: EVERGREEN, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: January 25, 2020

Effective Date: January 25, 2020

Expiration Date: January 24, 2025

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Operating Permit Summary No. 1.

Emission Unit(s):

METALLIC DIP OPERATION

Designation No(s). in Application:

001

Description:

METALLIC DIP OPERATION

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><i>Section 1--Applicability</i></p> <p>1. This source is subject to a PSD synthetic minor emission limitation.</p>	<p>ADEM Admin. Code R. 335-3-14-.04</p>
<p><i>Section 2--Emission Standards</i></p> <p>1. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.</p>	<p>ADEM Admin. Code R. 335-3-14-.04(8)</p>
<p><i>Section 3--Compliance and Performance Test Methods and Procedures</i></p> <p>1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p><i>Section 4--Emission Monitoring</i></p> <p>1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.</p>	
<p><i>Section 5--Recordkeeping and Reporting Requirements</i></p> <p>1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

- 2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a

ADEM Admin. Code
R. 335-3-1-.04

format approved by the Department in advance.

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Operating Permit Summary No. 2.

Emission Unit(s):

STAIN CONCENTRATE OPERATION

Designation No(s). in Application:

002

Description:

STAIN CONCENTRATE OPERATION

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><i>Section 1--Applicability</i></p> <p>1. This source is subject to a PSD synthetic minor emission limitation.</p>	<p>ADEM Admin. Code R. 335-3-14-.04</p>
<p><i>Section 2--Emission Standards</i></p> <p>1. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.</p>	<p>ADEM Admin. Code R. 335-3-14-.04(8)</p>
<p><i>Section 3--Compliance and Performance Test Methods and Procedures</i></p> <p>1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p><i>Section 4--Emission Monitoring</i></p> <p>1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.</p>	
<p><i>Section 5--Recordkeeping and Reporting Requirements</i></p> <p>1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

- 2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a

ADEM Admin. Code
R. 335-3-1-.04

format approved by the Department in advance.

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Operating Permit Summary No. 3.

Emission Unit(s):

PINE CONE TIPPING OPERATION

Designation No(s). in Application:

003

Description:

PINE CONE TIPPING OPERATION

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.	ADEM Admin. Code R. 335-3-14-.04(8)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1-.04
<i>Section 4--Emission Monitoring</i>	
1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.	
<i>Section 5--Recordkeeping and Reporting Requirements</i>	
1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:	ADEM Admin. Code R. 335-3-1-.04

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

- 2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a

ADEM Admin. Code
R. 335-3-1-.04

format approved by the Department in advance.

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Operating Permit Summary No. 4.

Emission Unit(s):

SCENTED PINE CONE OPERATION

Designation No(s). in Application:

004

Description:

SCENTED PINE CONE OPERATION

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
<i>Section 2--Emission Standards</i>	
1. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.	ADEM Admin. Code R. 335-3-14-.04(8)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1-.04
<i>Section 4--Emission Monitoring</i>	
1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.	
<i>Section 5--Recordkeeping and Reporting Requirements</i>	
1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:	ADEM Admin. Code R. 335-3-1-.04

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

- 2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a

ADEM Admin. Code
R. 335-3-1-.04

format approved by the Department in advance.

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Operating Permit Summary No. 5.

Emission Unit(s):

METHYL BROMIDE FUMIGATION

Designation No(s). in Application:

005

Description:

METHYL BROMIDE FUMIGATION

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><i>Section 1--Applicability</i></p> <p>1. This source is subject to a PSD synthetic minor emission limitation.</p>	<p>ADEM Admin. Code R. 335-3-14-.04</p>
<p><i>Section 2--Emission Standards</i></p> <p>1. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.</p>	<p>ADEM Admin. Code R. 335-3-14-.04(8)</p>
<p><i>Section 3--Compliance and Performance Test Methods and Procedures</i></p> <p>1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>
<p><i>Section 4--Emission Monitoring</i></p> <p>1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.</p>	
<p><i>Section 5--Recordkeeping and Reporting Requirements</i></p> <p>1. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:</p>	<p>ADEM Admin. Code R. 335-3-1-.04</p>

- (a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
- (b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
- (d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.
- (e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.
- (f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
- (g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.
- (h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

- 2. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a

ADEM Admin. Code
R. 335-3-1-.04

format approved by the Department in advance.

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Operating Permit Summary No. 6.

Emission Unit(s):

3,500 GALLON TOLUENE TANK

Designation No(s). in Application:

006

Description:

3,500 GALLON TOLUENE TANK

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	235 TONS OF VOCs PER ROLLING 12 MONTH PERIOD	SYNTHETIC MINOR PSD

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. These units are subject to the loading and storage of VOC limits.	ADEM Admin. Code R. 335-3-6-.03
2. This source is subject to a PSD synthetic minor emission limitation.	ADEM Admin. Code R. 335-3-14-.04
<i>Section 2--Emission Standards</i>	
1. These units shall have installed and operate one of the control options listed in ADEM Admin. Code R. 335-3-6-.03 (2)	ADEM Admin. Code R. 335-3-6-.03 (2)
2. Emission of Volatile Organic Compounds (VOCs) from Unit Nos. 001-006 from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 235 tons per year (TPY) in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.	ADEM Admin. Code R. 335-3-14-.04(8)
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A. Vendor data based on this method is an appropriate substitute.	ADEM Admin. Code R. 335-3-1-.04
<i>Section 4--Emission Monitoring</i>	
1. The monitoring requirements in this permit shall be as required in Section 5--Recordkeeping and Reporting Requirements.	
<i>Section 5--Recordkeeping and Reporting Requirements</i>	

1. Written records, plans, or blueprints of the control device(s) chosen for each tank shall be maintained at the facility. These shall be available upon request to show installation and operation of the required control device.

ADEM Admin. Code
R. 335-3-1-.04

2. Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this air permit. These records shall contain the following information:

ADEM Admin. Code
R. 335-3-1-.04

(a) The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.

(b) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(c) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(d) Compliance with VOC limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(e) Complete inventories of the VOC and HAP containing materials (their usage and VOC content) shall be made at the end of each calendar month.

(f) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units

of pounds and tons.

(g) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

(h) Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

ADEM Admin. Code
R. 335-3-1-.04

3. A report summarizing the information in proviso 5.1 shall be submitted each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

ADEM Admin. Code
R. 335-3-1-.04

Operating Permit Summary No. 7.

Emission Unit(s):

- 7A: PAINT LINE NO. 1(DTC)**
- 7B:**
- 7C: METHYL BROMIDE FUMIGATION NO. 2 (DTC)**
- 7D:**
- 7E: OAK PLANT SPRAY PAINTING (DTC)**
- 7F: DYEING AND PRESERVATION (DTC)**
- 7G:**
- 7H:**
- 7I:**
- 7J:**
- 7K:**
- 7L: BLEACH PLANT OPERATIONS (SR)**

Designation No(s). in Application:

Numerous

Description:

MISCELLANEOUS OPERATIONS

Type and quantity of fuel used:

Primary: None

Secondary: None

Pollutants Emitted:

Pollutant	Regulatory Emission Limit	Applicable Standard
VOCs	NONE	NONE

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<i>Section 1--Applicability</i>	
1. These sources are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits."	Rule 335-3-16-.03
2. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A
<i>Section 2--Emission Standards</i>	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	
<i>Section 3--Compliance and Performance Test Methods and Procedures</i>	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	
<i>Section 4--Emission Monitoring</i>	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	
<i>Section 5--Recordkeeping and Reporting Requirements</i>	
1. These Sources are subject to no additional specific requirements other than those listed in the General Permit Provisos.	