

## AIR PERMIT

**PERMITTEE:** ABBIE CWP, LLC  
**FACILITY NAME:** ABBIE CWP, LLC  
**LOCATION:** ABBEVILLE, HENRY COUNTY, ALABAMA

<b>PERMIT NUMBER</b>	<b>DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE</b>
606-S009-X001	200 MBF Direct-Fired Lumber Kiln w/16 MMBtu/hr Natural Gas-Fired Burner

*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.*

**ISSUANCE DATE:**

Alabama Department of Environmental Management

**ABBIE CWP, LLC  
ABBEVILLE, ALABAMA  
PERMIT NO. 606-S009-X001  
PROVISOS**

1. 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.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate, reduce, or control the issuance of air contaminants.
4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
5. Each point of emission, which requires testing, will 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.
6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
7. This process, including 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.
8. Submittal 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 stack emission testing at any time.
9. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

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10. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
11. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working 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:

- (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 procedure requires probe cleaning).
- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter 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 Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

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.

12. Any performance tests 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.
13. 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.
14. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

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Plant or haul roads and grounds will 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:

- (a) 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;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) 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 Department prior to utilization.

- 15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, 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.
- 16. 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.
- 17. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
- 18. 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 (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). This report shall include:
  - (a) A certification that all maintenance and operating practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished;
  - (b) Each of the calculated 12-month rolling totals (BF) of lumber dried during the reporting period.
- 19. The permittee shall submit an Annual Compliance Certification to the Air Division no later than 60 days following the anniversary of the issuance of this permit.
  - (a) The compliance certification shall include the following:
    - i) The identification of each term or condition of this permit that is the basis of the certification;

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- ii) The compliance status;
  - iii) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);
  - iv) Whether compliance has been continuous or intermittent; and
  - v) Such other facts as the Department may require to determine the compliance status of the source.
- (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:

Enforcement and Compliance Assurance Division  
EPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

The compliance certification 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.

**Lumber Dry Kiln  
Summary Page**

**Description:** 200 MBF Lumber Dry Kiln w/16 MMBtu/hr Natural Gas-Fired Burner

**Installation Date:** July 2021 – September 2021

**Operating Capacity:** 52 MMBF/yr

**Operating Schedule:** 24 hrs/day, 7 days/week, 52 weeks/yr

**Pollutants Emitted:**

<b>Emission Point</b>	<b>Point Description</b>	<b>Pollutant</b>	<b>Emission Limit</b>	<b>Standard</b>
KILN	Lumber Dry Kiln	PM	$E = 3.59(P)^{0.62}$ ( $P < 30$ TPH) and $E = 17.31P^{0.16}$ ( $P \geq 30$ TPH)	ADEM Admin. Code r. 335-3-4-.04(1)

**Lumber Dry Kiln Provisos**

	<b>Regulations</b>
<p><b>1) <u>Applicability</u></b>                      This source is subject to the applicable requirements of Rule 335-3-16-.03, "Major Source Operating Permits".</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p>
<p><b>2) <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter (as TSP) in any one hour from any process in excess of the amount determined by the following equations:</p> <p style="text-align: center;"><b><math>E=17.31P^{0.16}</math> (<math>P \geq 30</math> TPH)</b>  <b><math>E=3.59P^{0.62}</math> (<math>P &lt; 30</math> TPH)</b></p> <p>Where:</p> <p style="padding-left: 40px;">E = Emissions (in pounds per hour)                      P = 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>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p>
<p><b>3) <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) Total particulate emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) Particulate matter emissions less than 10 microns and 2.5 microns from this unit shall be determined in accordance with 40 CFR Part 51, Appendix M, Methods 201A and 202, or other test methods approved by the Air Division.</p> <p>(c) Visible emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(d) Volatile organic compounds (VOC) emissions from this unit shall be determined in accordance with EPA OTM 26, or an alternate method if approved in advance by the Air Division.</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> <p>ADEM Admin. Code r. 335-3-1-.05</p>
<p><b>4) <u>Emission Monitoring</u></b>                      There are no monitoring requirements associated with this unit.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>

	Regulations
<p><b>5) <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) Within 180 days of issuance of Temporary Authorization to Operate the kiln, the Permittee shall develop, implement, and submit to the Air Division a preventive maintenance plan for the kiln.</p> <p>(b) The Permittee shall maintain records documenting its compliance with the preventive maintenance plan.</p> <p>(c) The Permittee shall maintain records of total production for the kiln, including monthly production and 12-month rolling totals. Within ten (10) days of the end of each calendar month, records of the total throughput for the last calendar month shall be recorded and the rolling 12-month total updated.</p> <p>(d) The Permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>