



## MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** SCOTCH PLYWOOD COMPANY, INC.

**FACILITY NAME:** BEATRICE DIVISION

**FACILITY/PERMIT NO.:** 106-S009

**LOCATION:** BEATRICE, MONROE COUNTY, ALABAMA

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

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

**Issuance Date:** DRAFT

**Effective Date:** DRAFT

**Expiration Date:** June 14, 2029

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Alabama Department of Environmental  
Management

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**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. 335-3-16-.13(1)(a)5.

ADEM Admin. Code r.  
335-3-16-.02(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.  
335-3-16-.12(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.  
335-3-16-.05(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.  
335-3-16-.05(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.  
335-3-16-.05(g)

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**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.  
335-3-16-.05(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.  
335-3-16-.05(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.  
335-3-16-.05(j)

**8. Economic Incentives, Marketable Permits, and Emissions Trading**

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.  
335-3-16-.05(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.  
335-3-16-.07(a)

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**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:

- (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.

ADEM Admin. Code r.  
335-3-16-.07(b)

**11. 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.

ADEM Admin. Code r.  
335-3-16-.07(c)

**12. Compliance Certification**

The Permittee shall submit a complete and accurate compliance certification by August 14<sup>th</sup> of each year for each annual reporting period of this permit (June 15<sup>th</sup> – June 14<sup>th</sup>).

- (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;

ADEM Admin. Code r.  
335-3-16-.07(e)

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<p>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</p> <p>(4) Whether compliance has been continuous or intermittent;</p> <p>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</p> <p>(b) The compliance certification shall be submitted to:</p> <p align="center">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p align="center">and to:</p> <p align="center">EPA Region 4 via email at EPA_R4_CAA_Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)</p>	
<p><b>13. Reopening for Cause</b></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(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.</p> <p>(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.</p>	<p>ADEM Admin. Code r. 335-3-16-.13(5)</p>

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(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 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.

§22-28-16(d), Code of Alabama 1975, as amended

**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:

ADEM Admin. Code r. 335-3-1-.07(1),(2)

- (1) Identification of the specific facility to be taken out of service as well as its location and permit number;
- (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.



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(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), Code of Alabama 1975, as amended

**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. 335-3-1-.08

**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. 335-3-4-.02

(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;

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- (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 335-3-16-.13 or 335-3-16-.14.

ADEM Admin. Code r.  
335-3-16-.13 and  
335-3-16-.14

**20. Recordkeeping Requirements**

- (a) Records of required monitoring information of the source shall include the following:
  - (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.

ADEM Admin. Code r.  
335-3-16-.05(c)2.

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(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. Reporting 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. 335-3-16-.04(9).

ADEM Admin. Code r. 335-3-16-.05(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. Emission Testing Requirements**

Each point of emission which requires testing shall be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)

The Air Division must be notified in writing at least 20 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. 335-3-1-.04

(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.

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<p>(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).</p> <p>(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.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <p>A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.</p> <p>All test reports must be submitted to the Air Division within <b>30 days</b> of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	
<p><b>23. <u>Payment of Emission Fees</u></b></p> <p>(a) The Permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-7-.04 according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p> <p>(b) The Permittee shall submit its estimate of actual emissions for the previous calendar year according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</p>	<p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>
<p><b>24. <u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>ADEM Admin. Code r. 335-3-1-.04(1)</p>

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**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.

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 Part 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.

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

**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:

(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.

40 CFR Part 68

**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 shall make the permit readily available for inspection by any or all persons who may request to see it.

ADEM Admin. Code r.  
335-3-14-.01(1)(d)

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<p><b>28. <u>Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>ADEM Admin. Code r. 335-3-1-.10</p>
<p><b>29. <u>Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>ADEM Admin. Code r. 335-3-4-.01(1)</p>
<p><b>30. <u>Fuel-Burning Equipment</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-5-.01.</p>	<p>ADEM Admin. Code r. 335-3-4-.03</p> <p>ADEM Admin. Code r. 335-3-5-.01</p>
<p><b>31. <u>Process Industries – General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p>	<p>ADEM Admin. Code r. 335-3-4-.04</p>
<p><b>32. <u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>

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**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.

ADEM Admin. Code r.  
335-3-3-.01

**Emission Unit No. 001 (Wood-Fired Boiler)**

**Summary Page**

**Description:** 93 MMBtu/hr Wood-Fired Boiler w/Two-Stage Multiclone

**Permitted Operating Schedule:** 8,760 hr/yr

**Emission Limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
001	Boiler Stack	PM	0.20 gr/dscf @50% excess air	ADEM Admin. Code r. 335-3-4-.08
		SO <sub>2</sub>	4 lb/MMBtu	ADEM Admin. Code r. 335-3-5-.01(b)



**Emission Unit No. 001 (93 MMBtu/hr Wood-Fired Boiler)**

**Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p><b>1. <u>Applicability</u></b></p> <p>(a) This boiler is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03 “Major Source Operating Permits.”</p> <p>(b) This boiler is subject to the applicable requirements of 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) No person shall cause or permit the emission of particulate matter from this unit in excess of 0.20 gr/dscf, adjusted to 50% excess air.</p> <p>(b) No person shall cause or permit the emission of sulfur dioxide from this unit in excess of 4 lb/MMBtu heat input.</p> <p>(c) The opacity from this unit shall not exhibit greater than 20 percent opacity (six minute average), except for one six minute period per hour of not more than 40 percent opacity.</p> <p>(d) The Permittee shall conduct a performance tune-up of this boiler on a biennial basis. The initial tune-up shall be conducted no later than the date specified in 40 CFR §63.11196, and each subsequent tune-up shall be conducted no more than 25 months after the previous tune-up. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup. Each tune-up shall be conducted in accordance with the requirements of 40 CFR §63.11223(b), which include, as applicable:</p> <p>(i) Inspect the burner and clean or replace any components of the burner, as necessary;</p> <p>(ii) Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern. The adjustment shall be consistent with the manufacturer's specifications, if available;</p> <p>(iii) Inspect the system controlling the air-to-fuel ratio and ensure that it is correctly calibrated and functioning properly;</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>40 CFR Part 63, Subpart JJJJJ</p> <p>ADEM Admin. Code r. 335-3-4-.08</p> <p>ADEM Admin. Code r. 335-3-5-.01(b)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>40 CFR §63.11201, §63.11223, and Table 2 to 40 CFR 63, Subpart JJJJJ</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(iv) Optimize total emissions of carbon monoxide. This optimization shall be consistent with the manufacturer's specifications, if available;</li> <li>(v) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made);</li> <li>(vi) Maintain onsite and submit, if requested, a report containing the following information: <ul style="list-style-type: none"> <li>(a) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.</li> <li>(b) A description of any corrective actions taken as a part of the tune-up of the boiler.</li> <li>(c) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.</li> </ul> </li> <li>(e) At all times, the Permittee shall operate and maintain this boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.</li> </ul>	<p>40 CFR §63.11205</p>
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <ul style="list-style-type: none"> <li>(a) The particulate emission rate from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</li> <li>(b) Visible emissions from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</li> </ul>	<p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-3-16-.04</p>
<p><b>4. <u>Emission Monitoring</u></b></p> <ul style="list-style-type: none"> <li>(a) The Permittee shall determine compliance with the applicable particulate and visible emission standards by conducting emissions testing on this unit annually during the first calendar quarter, except as specified below: <ul style="list-style-type: none"> <li>(i) If two consecutive annual performance tests for particulate matter, as required above, demonstrate compliance at or below 75% of the applicable standard (0.20 gr/dscf, adjusted to 50% excess air), the Permittee may elect to conduct</li> </ul> </li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05</p>

Federally Enforceable Provisos	Regulations
<p>subsequent tests during the first calendar quarter of each third year, except as specified in 4(i) and 4(ii),</p> <p>(ii) If the results of any performance test for particulate matter indicate emissions greater than 75% of the applicable standard (0.20 gr/dscf, adjusted to 50% excess air), the Permittee will be required to conduct emissions testing on an annual basis until all performance tests for particulate matter over a consecutive two-year period indicate emissions less than 75% of the applicable standard.</p> <p>(iii) If there are any changes in boiler operations or a modification of the boiler system, the Permittee will be required to conduct emissions testing on an annual basis to establish two consecutive annual performance tests for particulate matter demonstrating compliance at or below the applicable standard.</p> <p>(b) A six-minute visible emissions observation of the boiler stack emissions shall be conducted daily (weather permitting) during daylight hours while the boiler is operating in accordance with 40 CFR Part 60, Appendix A, Method 9. On weekends (Saturday and Sunday), an observer familiar with the operation of the boiler shall conduct a daily observation of the boiler stack emission when the boiler is operating during daylight hours.</p> <p>(c) If a weekday evaluation indicates visible emissions from a six-minute average are greater than 10% opacity, or if a weekend observation indicates visible emissions are greater than normal, the Permittee shall take immediate corrective action to reduce the visible emissions within 24 hours or verify within 24 hours that the unit and the associated air pollution control equipment are operating normally, in accordance with standard procedures and under the same conditions demonstrated during the most recent compliant stack test.</p> <p>(d) To ensure proper operation, the Permittee shall inspect the multiclone at least annually, but more frequently if visible emissions exceeding the 10% opacity corrective action threshold during a Method 9 observation are observed or if visible emissions are noted to be greater than normal on Saturday or Sunday. If the results of the inspection indicate that cleaning or maintenance is needed, the Permittee shall initiate such action as soon as practicable but no longer than 24 hours after completing the inspection.</p>	

Federally Enforceable Provisos	Regulations
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) The Permittee shall maintain records of emission monitoring performed in a permanent form on-site and available for inspection for at least five (5) years from the date of generation of each record. These records shall include:</p> <ul style="list-style-type: none"> <li>(i) The date, time, and results of each visible emission observation (weekday) or observation for greater than normal visible emissions (weekend);</li> <li>(ii) The date(s), time, nature, and results of any corrective action taken when visible emissions exceeded 10% opacity or greater than normal visible emissions were observed;</li> <li>(iii) The date(s) the multiclone was inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.</li> </ul> <p>(b) The Permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (June 15<sup>th</sup> – December 14<sup>th</sup> and December 15<sup>th</sup> – June 14<sup>th</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(i) A statement as to whether all observations for visible emissions (weekday) or greater than normal visible emissions (weekend) were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;</li> <li>(ii) The date(s), time, nature, and results of any corrective action taken when visible emissions exceeded 10% opacity or greater than normal visible emissions were observed; and</li> <li>(iii) The date(s) the multiclone was inspected for proper operation and, if the results of the inspection indicated that cleaning or emission-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.</li> </ul> <p>(c) The Permittee shall submit the applicable notifications outlined in 40 CFR §63.11225(a) to both the Air Division and the EPA (Region 4) by the date specified.</p> <p>(d) The Permittee shall prepare and submit biennial compliance reports in accordance with 40 CFR §63.11225(b) to both the Air Division and the EPA (Region 4). The reports shall be prepared and submitted by March 1<sup>st</sup> of every other year.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>40 CFR §63.11225(a)</p> <p>40 CFR §63.11225(b)</p>

Federally Enforceable Provisos	Regulations
<p>(e) The Permittee shall maintain the applicable records outlined in 40 CFR §63.11225(c) in a form suitable and readily available for expeditious review and shall retain each record for 5 years following the date of each recorded action. The Permittee shall keep each record on-site for at least 2 years after the date of each recorded action, but may keep the records off-site for the remaining 3 years. These records shall include, but may not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(i) A copy of each notification and report required to the comply with 40 CFR 63, Subpart JJJJJ, and all documentation supporting any Initial Notification of Applicability or Notification of Compliance Status submitted;</li> <li>(ii) Records to document conformance with the management practices required by §63.11214 as specified in 40 CFR §63.11225(c)(2)(i) through (v);</li> <li>(iii) Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment; and</li> <li>(iv) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore to malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.</li> </ul>	<p>40 CFR §63.11225(c)</p>

**Emission Unit No. 002 (Veneer Dryer)**

**Summary Page**

**Description:** 15.4 MSF Coe Veneer Dryer

**Permitted Operating Schedule:** 8,760 hr/yr

**Emission Limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
002	Veneer Dryer	PM	3.59(P) <sup>0.62</sup>	ADEM Admin. Code r. 335-3-4-.04

Emission Unit No. 002 (Veneer Dryer)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p><b>2. <u>Emission Standards</u></b></p> <p>The Permittee shall not cause or permit the emission of particulate matter in any one hour from this process in excess of the amount determined by the equation:</p> $E = 3.59(P)0.62$ <p>where E = Emissions in pounds per hour P = Process weight per hour in tons per hour</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If required, the particulate emission rate from this process shall be measured in accordance with the 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If required, the opacity from this process shall be measured in accordance with the 40 CFR Part 60, Appendix A, Method 9.</p> <p><b>4. <u>Emission Monitoring</u></b></p> <p>There are no applicable emission monitoring requirements associated with this unit.</p> <p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>There are no recordkeeping or reporting requirements associated with this unit.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>

**Emission Unit No. 003 (Emergency Fire Water Pump)**

**Summary Page**

**Description:** 144 Hp Diesel-Fired Emergency Fire Water Pump Engine

**Permitted Operating Schedule:** 8,760 hr/yr

**Emission Limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
Emergency ICE	144 Hp Fire Pump	NMHC + NO <sub>x</sub>	4.0 g/kW-hr (3.0 g/HP-hr)	40 CFR §60.4205(c) and §60.4202(d)
		PM	0.30 g/kW-hr (0.22 g/HP-hr)	
		HAP	N/A	ADEM Admin. Code r. 335-3-11-.06(103)



**Emission Unit No. 003 (Emergency Fire Water Pump)**

**Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p><b>1. <u>Applicability</u></b></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits”.</p> <p>(b) This unit is subject to 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 General Provisions of Subpart A (as applicable) as outlined in Table 8 to 40 CFR Part 63, Subpart ZZZZ.</p> <p>(c) This unit is subject to the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines, 40 CFR 60, Subpart III.</p> <p>(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 III.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The Permittee shall not cause or allow the emissions from this unit to exceed the applicable emission standards in Table 4 to Subpart III, specifically:</p> <p>(i) The sum of the emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NO<sub>x</sub>) shall not exceed 4.0 g/kW-hr (3.0 g/HP-hr);</p> <p>(ii) Particulate matter (PM) emissions shall not exceed 0.30 g/kW-hr (0.22 g/HP-hr).</p> <p>(b) The Permittee shall not burn any diesel fuel in this unit that does not meet the following per-gallon standards of 40 CFR §80.510(b):</p> <p>(i) Sulfur content shall not exceed 15 parts per million (ppm); and</p> <p>(ii) Cetane index shall be a minimum of 40 <u>or</u> the aromatic content shall not exceed 35 volume percent.</p> <p>(c) The Permittee shall only operate this unit as specified below:</p> <p>(i) Emergency situations;</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(103)</p> <p>ADEM Admin. Code r. 335-3-10- .02(87)</p> <p>40 CFR §60.4218</p> <p>40 CFR §60.4205(c) and §60.4202(d)</p> <p>40 CFR §60.4207</p> <p>40 CFR §60.4211(e)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(ii) Maintenance checks and readiness testing not to exceed 100 hours per year; and</li> <li>(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 checks and readiness testing.</li> </ul>	
<p><b>3. <u>Compliance and Performance Test Methods</u></b></p> <p>There are no applicable performance test methods or procedures associated with this unit.</p>	
<p><b>4. <u>Emission Monitoring</u></b></p> <ul style="list-style-type: none"> <li>(a) The Permittee shall operate and maintain this unit according to the manufacturer's written instructions over the life of the engine.</li> <li>(b) The Permittee shall install and operate a non-resettable hour meter on this unit.</li> </ul>	<p>40 CFR §60.4206 and §60.4211(a)</p> <p>40 CFR §60.4209</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <ul style="list-style-type: none"> <li>(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.</li> <li>(b) To demonstrate compliance with the fuel limitations, the Permittee shall maintain records of the sulfur content <u>and</u> 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 on-site 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.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c) and 40 CFR §60.4214(b)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(c) The Permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). The report shall include:</p> <ul style="list-style-type: none"> <li>(i) Whether the unit was operated during the reporting period,</li> <li>(ii) The date, time, duration, and purpose of operation each time this unit was operated during the reporting period,</li> <li>(iii) Written documentation that the fuel used during the reporting period met the requirements of 40 CFR §80.510(b) for non-road diesel.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05</p>

**Provisos for Facility-Wide Fugitive Dust Plan**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<p><b>1. <u>Applicability</u></b></p> <p>This facility is subject to the applicable requirements of ADEM Admin. Code r. 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>The Permittee shall take reasonable precautions as directed in Proviso 18 to prevent fugitive dust at the facility which travel beyond the facility property line and cause a nuisance.</p>	<p>ADEM Admin. Code r. 335-3-4-.02</p>
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>The Permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p>	<p>ADEM Admin. Code r. 335-3-16-.07</p>
<p><b>4. <u>Emission Monitoring</u></b></p> <p>The Permittee shall conduct weekly visual observations for fugitive dust in areas listed with the potential to generate fugitive dust, considering factors such as naturally wet conditions. If visible emissions are observed traveling beyond the facility property line, any necessary corrective actions shall be initiated within four (4) hours of observation.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of Proviso 4. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</p>	<p>ADEM Admin Code r. 335-3-16-.05</p>

**Appendix A**  
**Fugitive Dust Plan**

**SCOTCH PLYWOOD COMPANY, INC.  
BEATRICE, ALABAMA**

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**Fugitive Dust Control Plan**

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**Facility No. 106-S009**

**Prepared By:  
H. M. Rollins Company, Inc.  
P. O. Box 3471  
Gulfport, Mississippi 39505  
(228) 832-1738**

**April 1, 2024**

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**APPENDIX A Facility Map**

**APPENDIX B Inspection Sheet**

## **1.0 GENERAL INFORMATION**

This facility is located near Beatrice, Monroe County, Alabama. The approximate center of the plant site is at 31.701974 LAT and -87.224217 LONG. A portion of the USGS map showing the facility is included in Appendix A. This facility receives Southern Yellow Pine logs and uses them to produce veneer. The operations are described at Standard Industrial Classification (SIC) Code 2436. As a result of the veneer production process there are some activities that may result in the generation of fugitive dust. This plan has been developed and implemented to minimize and manage that dust.

### **1.1 Regulatory Applicability**

The Alabama Department of Environmental Management (ADEM) has authorized facility operation under Major Source Operating Permit No. 106-S009. ADEM requires this facility to mitigate fugitive dust by using one or more of the approved measures found in Section 2.0 of this plan.

## **2.0 FUGITIVE DUST CONTROL MEASURES**

The purpose of this section is to identify the sources of fugitive dust at this facility and explain the control measures taken to minimize the fugitive dust becoming airborne.



## 2.1 Sources

### 2.1.1 Mechanical Conveyance Systems

A chain driven mechanical conveyance system is used to deliver wood residue fuel consisting of chips and sawdust to the fuel silo and subsequently to the wood-fired boiler to be burned for steam production.

### 2.1.2 Roads

Raw materials and finished products are transported onto, throughout, and from the facility on mostly paved roads, but also on some unpaved roads.

## 2.2 Control Measures

The control measures in this section are being used to mitigate fugitive dust becoming airborne from the aforementioned sources.

### 2.2.1 Mechanical Conveyance System

- A. ***Covered Chain Driven Conveyance System*** - the conveyor chains are covered to the best extent possible to reduce fugitive dust becoming airborne without creating a potential fire hazard due to system clogs.

- B. ***Wetting of the Material*** - there are openings along the system that allow for visual inspection and wetting of the transferred materials to minimize fugitive dust becoming airborne.
  
- C. ***Housekeeping*** - clean up spillage at conveyor transfer points.

### 2.2.2 Unpaved Roads

- A. ***Speed Limit for Plant Roads*** - the speed limit of all plant vehicular traffic is limited to 10 miles per hour or less to reduce fugitive dust becoming airborne.
  
- B. ***Water Truck Operation*** - a water truck will periodically wet roadways when needed to minimize fugitive dust becoming airborne.

### 2.3 Operation and Maintenance Procedures

The control measures mentioned in Section 2.2 of this plan will be implemented and maintained by facility personnel. The inspection to ensure the effectiveness of the fugitive dust control measures can be found in Appendix B of this plan and include:

- A weekly inspection of the mechanical conveyance systems to ensure covers are minimizing fugitive dust becoming airborne during transfer. Perform housekeeping when needed.

- A weekly inspection of the roads to identify if the roads are dry enough to allow for the creation of fugitive dust emissions by vehicular traffic. Wet roadways when needed.

### **3.0 INSPECTION, RECORDKEEPING, REPORTING AND TRAINING**

#### **3.1 Inspection**

Inspections will be performed in accordance with Section 2.3 of this plan.

#### **3.2 Recordkeeping and Reporting**

The records of inspection and maintenance performed will be kept on-site and available for review at all times. Reporting will be required whenever there is a deviation from this plan that necessitates notification to ADEM in accordance with MSOP No. 106-S009.

#### **3.3 Training**

Initial training will be provided to the facility personnel responsible for fugitive dust control implementation and maintenance. Annual refresher training will be provided. The contents of this training will include fugitive dust sources, fugitive dust control measures, housekeeping practices, and the importance of adhering to the fugitive dust control plan.

#### 4.0 PLAN REVISION AND UPDATES

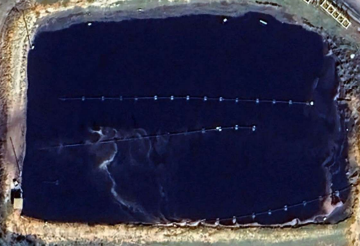
This plan will be reviewed at least once every five years. At any point during normal plant operations should the control measures in this plan not adequately address fugitive dust emissions or if a new source of fugitive dust is identified through inspection, this plan will be updated to reflect those changes.

<b>Revision Date</b>	<b>Description of Changes</b>	<b>Prepared By:</b>

# **Appendix A**



Scotch plywood company



Google Earth



# **Appendix B**

