



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: BOISE CASCADE WOOD PRODUCTS, LLC.

FACILITY NAME: CHAPMAN PLYWOOD

FACILITY/PERMIT NO.: 203-S001

LOCATION: CHAPMAN, BUTLER 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:

Expiration Date:

Alabama Department of Environmental Management

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General Permit Provisos

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<p>1. <u>Transfer</u></p> <p>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.</p> <p>2. <u>Renewals</u></p> <p>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.</p> <p>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.</p> <p>3. <u>Severability Clause</u></p> <p>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.</p> <p>4. <u>Compliance</u></p> <p>(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.</p> <p>(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.</p> <p>5. <u>Termination for Cause</u></p> <p>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.</p>	<p>ADEM Admin. Code r. 335-3-16-.02(6)</p> <p>ADEM Admin. Code r. 335-3-16-.12(2)</p> <p>ADEM Admin. Code r. 335-3-16-.05(e)</p> <p>ADEM Admin. Code r. 335-3-16-.05(f)</p> <p>ADEM Admin. Code r. 335-3-16-.05(g)</p> <p>ADEM Admin. Code r. 335-3-16-.05(h)</p>

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<p>6. <u>Property Rights</u></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p> <p>7. <u>Submission of Information</u></p> <p>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.</p> <p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></p> <p>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.</p> <p>9. <u>Certification of Truth, Accuracy, and Completeness</u></p> <p>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.</p> <p>10. <u>Inspection and Entry</u></p> <p>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:</p> <p>(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;</p> <p>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</p>	<p>ADEM Admin. Code r. 335-3-16-.05(i)</p> <p>ADEM Admin. Code r. 335-3-16-.05(j)</p> <p>ADEM Admin. Code r. 335-3-16-.05(k)</p> <p>ADEM Admin. Code r. 335-3-16-.07(a)</p> <p>ADEM Admin. Code r. 335-3-16-.07(b)</p>

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<p>(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;</p> <p>(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.</p>	
<p>11. <u>Compliance Provisions</u></p> <p>(a) The Permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.</p> <p>(b) The Permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.</p>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p>
<p>12. <u>Compliance Certification</u></p> <p>The Permittee shall submit a complete and accurate compliance certification by February 26th of each year for each annual reporting period of this permit (December 28th – December 27th).</p> <p>(a) The compliance certification shall include the following:</p> <ol style="list-style-type: none"> (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); (4) Whether compliance has been continuous or intermittent; (5) Such other facts as the Air Division may require to determine the compliance status of the source; <p>(b) The compliance certification shall be submitted to:</p>	<p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

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<p>Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p>and to:</p> <p>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>13. Reopening for Cause</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>(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.</p> <p>(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.</p>	<p>ADEM Admin. Code r. 335-3-16-.13(5)</p>
<p>14. Additional Rules and Regulations</p> <p>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.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>

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<p><u>15. Equipment Maintenance or Breakdown</u></p> <p>(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:</p> <ol style="list-style-type: none"> (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. <p>(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.</p>	<p>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p>
<p><u>16. Operation of Capture and Control Devices</u></p> <p>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.</p>	<p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>

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<p><u>17. Obnoxious Odors</u></p> <p>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.</p> <p><u>18. Fugitive Dust</u></p> <p>(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.</p> <p>(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:</p> <p>(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;</p> <p>(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;</p> <p>(3) By paving;</p> <p>(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.</p> <p>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.</p>	<p>ADEM Admin. Code r. 335-3-1-.08</p> <p>ADEM Admin. Code r. 335-3-4-.02</p>
<p><u>19. Additions and Revisions</u></p> <p>Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.</p>	<p>ADEM Admin. Code r. 335-3-16-.13 and 335-3-16-.14</p>
<p><u>20. Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)2.</p>

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<ul style="list-style-type: none"> (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. <p>(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.</p>	
<p>21. Reporting Requirements</p> <ul style="list-style-type: none"> (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). (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. 	<p>ADEM Admin. Code r. 335-3-16-.05(c)3.</p>
<p>22. Emission Testing Requirements</p> <p>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.</p> <p>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 or as otherwise specified in this permit or applicable regulation.</p>	<p>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p>

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<p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <ul style="list-style-type: none"> (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests. (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning). (c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity. (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances. <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 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>ADEM Admin. Code r. 335-3-1-.04</p>
<p>23. <u>Payment of Emission Fees</u></p> <ul style="list-style-type: none"> (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. (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>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>
<p>24. <u>Other Reporting and Testing Requirements</u></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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<p>25. Title VI Requirements (Refrigerants)</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(a)</p>
<p>26. Chemical Accidental Prevention Provisions</p> <p>If a chemical listed in Table 1 of 40 CFR Part §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:</p> <p>(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.</p> <p>(b) The owner or operator shall submit one of the following:</p> <p>(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 §68.10(a) or,</p> <p>(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.</p>	<p>40 CFR Part 68</p>
<p>27. Display of Permit</p> <p>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.</p>	<p>ADEM Admin. Code r. 335-3-14-.01(1)(d)</p>

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<p><u>28. Circumvention</u></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><u>29. Visible Emissions</u></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><u>30. Fuel-Burning Equipment</u></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><u>31. Process Industries – General</u></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><u>32. Averaging Time for Emission Limits</u></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><u>33. Open Burning</u></p> <p>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.</p>	<p>ADEM Admin. Code r. 335-3-1-.10</p> <p>ADEM Admin. Code r. 335-3-4-.01(1)</p> <p>ADEM Admin. Code r. 335-3-4-.03</p> <p>ADEM Admin. Code r. 335-3-5-.01</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-3-.01</p>

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<p>34. Compliance Assurance Monitoring (CAM)</p> <p>Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.</p> <p>(a) Operation of Approved Monitoring</p> <p>(1) <i>Commencement of operation.</i> The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).</p> <p>(2) <i>Proper maintenance.</i> At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>(3) <i>Continued operation.</i> Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.</p> <p>(4) <i>Response to excursions or exceedances.</i></p> <p>(i) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The</p>	<p>40 CFR §64.7</p>

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<p>response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.</p> <p>(ii) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.</p> <p>(5) <i>Documentation of need for improved monitoring.</i> After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.</p>	
<p>(b) Quality Improvement Plan (QIP) Requirements</p> <p>(1) Based on the results of a determination made under Section 34(a)(4)(i) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower</p>	<p>40 CFR §64.8</p>

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<p>percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.</p> <p>(2) <i>Elements of a QIP:</i></p> <ul style="list-style-type: none"> (i) The owner or operator shall maintain a written QIP, if required, and have it available for inspection. (ii) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: <ul style="list-style-type: none"> A. Improved preventive maintenance practices. B. Process operation changes. C. Appropriate improvements to control methods. D. Other steps appropriate to correct control performance. E. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). <p>(3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.</p> <p>(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 34(a)(4)(i) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:</p> <ul style="list-style-type: none"> (i) Failed to address the cause of the control device performance problems; or (ii) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. <p>(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing</p>	

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<p>monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.</p> <p>(c) Reporting and Recordkeeping Requirements</p> <p>(1) <i>General reporting requirements</i></p> <p>(i) On and after the date specified in Section 34(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-16-.05(c)3.</p> <p>(ii) A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)3. and the following information, as applicable:</p> <p>A. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;</p> <p>B. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and</p> <p>C. A description of the actions taken to implement a QIP during the reporting period as specified in Section 34(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.</p> <p>(2) <i>General recordkeeping requirements.</i></p> <p>(1) The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)2. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 34(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of</p>	<p>40 CFR §64.9</p>

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<p>monitoring maintenance or corrective actions).</p> <p>(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.</p> <p>(d) Savings Provisions</p> <p>Nothing in this part shall:</p> <p>(1) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.</p> <p>(2) Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.</p> <p>(3) Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.</p>	<p>40 CFR §64.10</p>

Emission Unit Nos. 001 and 003 (Nos. 1 and 3 Boilers)

Summary Page

Description: 121.2 MMBtu/hr Kipper and Sons Wood-Fired Boiler controlled by a Ducon Venturi Scrubber

63.1 MMBtu/hr Kipper and Sons Wood-Fired Boiler controlled by a Ducon Venturi Scrubber

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
001	No. 1 Boiler Stack	PM	0.20 gr/dscf @ 50% excess air	ADEM Admin. Code r. 335-3-4-.08
			0.44 lb/MMBtu	ADEM Admin. Code r. 335-3-11-.06(107)
		SO ₂	4 lb/MMBtu	ADEM Admin. Code r. 335-3-5-.01(1)(b)
		HCL	0.022 lb/MMBtu (until October 6, 2025) 0.020 lb/MMBtu (after October 6, 2025)	ADEM Admin. Code r. 335-3-11-.06(107)
		Hg	5.7E-06 lb/MMBtu (until October 6, 2025) 5.4E-06 lb/MMBtu (after October 6, 2025)	ADEM Admin. Code r. 335-3-11-.06(107)
		CO	3,500 ppm @ 3% O ₂	ADEM Admin. Code r. 335-3-11-.06(107)
003	No. 3 Boiler Stack	PM	0.20 gr/dscf @ 50% excess air	ADEM Admin. Code r. 335-3-4-.08
			0.44 lb/MMBtu	ADEM Admin. Code r. 335-3-11-.06(107)
		SO ₂	4 lb/MMBtu	ADEM Admin. Code r. 335-3-5-.01(1)(b)
		HCL	0.022 lb/MMBtu (until October 6, 2025) 0.20 lb/MMBtu (after October 6, 2025)	ADEM Admin. Code r. 335-3-11-.06(107)
		Hg	5.7E-06 lb/MMBtu (until October 6, 2025) 5.1E-06 lb/MMBtu (after October 6, 2025)	ADEM Admin. Code r. 335-3-11-.06(107)
		CO	3,500 ppm @ 3% O ₂	ADEM Admin. Code r. 335-3-11-.06(107)

Emission Unit Nos. 001 and 003 (Nos. 1 and 3 Boilers)**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
1. <u>Applicability</u>	
(a) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03 “Major Source Operating Permits.”	ADEM Admin. Code r. 335-3-16-.03
(b) These units are subject to the applicable requirements of 40 CFR Part 64, Compliance Assurance Monitoring.	40 CFR Part 64
(c) These boilers are subject to the applicable requirements of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDDD.	40 CFR Part 63, Subpart DDDDD
2. <u>Emission Standards</u>	
(a) The Permittee shall not cause or allow the emission of particulate matter from each boiler to exceed 0.20 grains per dry standard cubic foot (gr/dscf), adjusted to fifty percent (50%) excess air.	ADEM Admin. Code r. 335-3-4-.08(2)(d)
(b) The Permittee shall not cause or allow the emission of sulfur dioxide from each boiler in excess of 4 lb/MMBtu heat input.	ADEM Admin. Code r. 335-3-5-.01(1)(b)
(c) The Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from each boiler. At no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from each boiler. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-4-.01
(d) Used oil, as defined in ADEM Administrative Code chap. 335-14-17, which is not a hazardous waste and that is generated on site due to spills, may be burned for energy recovery in these units. Waste oil may not be burned during periods of startup and shutdown.	ADEM Admin. Code chap. 335-14-17
(e) The Permittee shall not cause or allow the filterable particulate matter emissions from each boiler to exceed 0.44 pounds per million BTU heat input (lb/MMBtu).	40 CFR §63.7500; 40 CFR 63, Subpart DDDDD, Table 2
(f) The Permittee shall not cause or allow the hydrogen chloride (HCl) emissions from each boiler to exceed 0.022 lb/MMBtu (until October 6, 2025) and 0.020 lb/MMBtu (after October 6, 2025)	40 CFR §63.7500; 40 CFR 63, Subpart DDDDD, Table 2
(g) The Permittee shall not cause or allow the mercury (Hg) emissions from each boiler to exceed 0.0000057 lb/MMBtu (until October 6, 2025) and 0.0000054 lb/MMBtu (after October 6, 2025).	40 CFR §63.7500; 40 CFR 63, Subpart DDDDD, Table 2

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(h) The Permittee shall not cause or allow the CO emissions from each boiler to exceed 3,500 parts per million (ppm) by volume on a dry basis corrected to 3 percent oxygen, averaged over three (3) 1-hour minimum sampling time runs.	40 CFR §63.7500; 40 CFR 63, Subpart DDDDD, Table 2
3. <u>Compliance and Performance Test Methods and Procedures</u>	
(a) If testing is required, the total particulate emission rate from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1-.05
(b) If testing is required, the PM ₁₀ and PM _{2.5} emission rates from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202.	ADEM Admin. Code r. 335-3-1-.05
(c) If testing is required, the opacity from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-1-.05
(d) If testing is required, the hydrogen chloride emission rate from these units shall be determined in accordance with Method 26 or 26A at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-1-.05; 40 CFR 63, Subpart DDDDD, Table 5
(e) If testing is required, the mercury emission rate from these units shall be determined in accordance with Method 29, 30A, or 30B at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-1-.05; 40 CFR 63, Subpart DDDDD, Table 5
(f) If testing is required, the sulfur dioxide emission rate from these units shall be measured in accordance with Method 6 or 6C at 40 CFR Part 60, Appendix A.	ADEM Admin. Code r. 335-3-1-.05
(g) If testing is required, the carbon monoxide emission rate from these units shall be measured in accordance with Method 10 at 40 CFR Part 60, Appendix A. The span value of the reference monitor shall be 2 times the concentration of the applicable emission limit.	ADEM Admin. Code r. 335-3-1-.05; 40 CFR 63, Subpart DDDDD, Table 5
(h) Any compliance or performance test required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.	ADEM Admin. Code r. 335-3-1-.05

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<p>(i) The Permittee shall conduct a performance tune-up of each boiler quinquennially. Each subsequent tune-up shall be conducted no more than 61 months after the previous tune-up. If a unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. Each tune-up shall be conducted in accordance with the requirements of 40 CFR §63.7540(a)(10), which include, as applicable:</p> <ul style="list-style-type: none"> (1) Inspect the burner and clean or replace any components of the burner, as necessary; (2) 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; (3) Inspect the system controlling the air-to-fuel ratio and ensure that it is correctly calibrated and functioning properly; (4) Optimize total emissions of carbon monoxide. This optimization shall be consistent with the manufacturer's specifications, if available and with any NO_x requirement to which the unit is subject; (5) 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); (6) Maintain on-site and submit a report containing the following information: <ul style="list-style-type: none"> (i) 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; (ii) A description of any corrective actions taken as a part of the tune-up of the boiler. (iii) A description of any corrective actions taken as a part of the tune-up of the boiler. <p>(j) At all times, the Permittee must operate and maintain these units, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.</p> <p>(k) The Permittee must demonstrate initial compliance according to applicable requirements listed in 40 CFR §63.7510.</p> <p>(l) The Permittee must conduct all applicable performance tests according to 40 CFR §63.7520 on an annual basis except as</p>	<p>40 CFR §63.7515(d); 40 CFR §63.7540; 40 CFR 63, Subpart DDDDD, Table 3</p> <p>40 CFR §63.7500(a)(3)</p> <p>ADEM Admin. Code r. 335-3-11-.06[107]</p> <p>40 CFR §63.7515</p>

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<p>specified below:</p> <p>(1) Annual performance tests must be completed no more than 13 months after the previous performance test;</p> <p>(2) If performance tests for a given pollutant for a least 2 consecutive years show that the emissions are at or below 75 percent of the emission limit for the pollutant and there are no changes in the operation or air pollution control equipment that could increase emissions:</p> <p>(i) The Permittee may choose to conduct performance tests for the pollutant every third year;</p> <p>(ii) Each such performance test must be conducted no more than 37 months after the previous performance test;</p> <p>(iii) If a performance test shows emissions exceeded the emission limit or 75 percent of the emission limit for a pollutant, the Permittee must conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period meet the required level (at or below 75 percent of the emission limit).</p> <p>(iv) If the Permittee demonstrates compliance with the mercury, HCl, or TSM based on fuel analysis, the Permittee shall conduct a monthly fuel analysis according to §63.7521 for each type of fuel burned that is subject to an emission limit in Tables 1, 2, or 11 through 13 to Subpart DDDDD. The Permittee may comply with this monthly requirement by completing the fuel analysis any time within the calendar month as long as the analysis is separated from the previous analysis by at least 14 calendar days. If the Permittee burns a new type of fuel, a fuel analysis shall be conducted before burning the new type of fuel in the boiler. The Permittee shall meet all applicable continuous compliance requirements in §63.7540. If each of 12 consecutive monthly fuel analyses demonstrates 75 percent or less of the compliance level, the fuel analysis frequency may be decreased to quarterly for that fuel. If any quarterly sample exceeds 75 percent of the compliance level or a new type of fuel is burned, the Permittee shall return to monthly monitoring for that fuel, until 12 months of fuel analyses are again less than 75 percent of the compliance level. If sampling is conducted on one day per month, samples should be no less than 14 days apart, but if multiple samples are taken per month, the 14-day restriction does not apply.</p> <p>(m) The Permittee must establish applicable site-specific operating limits according to 40 CFR §63.7520 and Table 7 to 40 CFR 63, Subpart DDDDD.</p>	<p>40 CFR §63.7530(b)</p>

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(n) The Permittee shall conduct monthly analyses of the moisture content of the fuel utilized in the boilers to demonstrate that the boilers meet the definition of a hybrid suspension grate boiler as defined in 40 CFR §63.7575.	40 CFR §63.7575
4. Emission Monitoring	
(a) A properly maintained and operated continuous recording device shall be utilized to record the differential pressure (in units of inches of water, "in. H ₂ O") across the venturi scrubber. While a boiler is operating, the differential pressure across the venturi scrubber shall be recorded, at a minimum, every 15 minutes.	40 CFR §64.7
(b) A properly maintained and operated continuous recording device shall be utilized to record the water flow rate (in units of gallons per minute, "gal/min") to the venturi scrubber. While a boiler is operating, the water flow rate to the scrubber shall be recorded, at a minimum, every 15 minutes.	40 CFR §64.7
(c) The differential pressure and water flow rate monitoring devices shall be calibrated in accordance with manufacturer's recommendations and necessary parts maintained for routine repair.	40 CFR §64.7
(d) The Permittee must maintain the 30-day rolling average operating load of each boiler such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test.	40 CFR §63.7530(b); 40 CFR 63, Subpart DDDDD, Table 7
(e) The Permittee must operate the oxygen trim system for the boilers with the oxygen level set at or above the lowest hourly average oxygen concentration measured during the CO performance test.	40 CFR §63.7525(a); 40 CFR 63, Subpart DDDDD, Table 7
(f) Upon detecting an excursion or exceedance of any operating parameter as indicated by required monitoring, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.	40 CFR §64.7

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<p>(g) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.</p> <p>(h) If the permittee determines through emission testing that parametric monitoring values other than those specified above are more appropriate, the permittee shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s).</p>	<p>40 CFR §64.7</p> <p>40 CFR §64.7</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) All required records shall be maintained in a permanent form on-site and available for inspection for at least five (5) years from the date of generation of each record.</p> <p>(b) The Permittee shall maintain records of all emission monitoring performed to include:</p> <ol style="list-style-type: none"> (1) Collecting operating load data or steam generation every 15 minutes and the calculated 30-day rolling averages; (2) The date, time, nature, and results of any investigation conducted when excursions from an emission monitoring parameter threshold were observed; (3) The date(s), nature, and results of any corrective action taken when excursions from an emission monitoring parameter threshold were observed; (4) Scrubber liquid flow and pressure drop monitor readings and the calculated 30-day rolling averages; (5) Continuous monitoring of the minimum daily oxygen trim system set points; (6) The date and results of the annual calibrations of the scrubber liquid flow and pressure drop monitors. <p>(c) The Permittee shall maintain records of monthly fuel use by the boilers, including the type(s) of fuel, and the amount(s) used.</p> <p>(d) The Permittee shall maintain records that demonstrate the fuel combusted in these units exceeds a moisture content of 40 percent on an as-fired annual heat input basis as demonstrated by monthly fuel analysis.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c); 40 CFR §63.7560</p> <p>ADEM Admin. Code r. 335-3-16-.05(c); 40 CFR 63, Subpart DDDDD, Table 8</p> <p>40 CFR §63.7555(d)(1)</p> <p>40 CFR §63.10(b)(1)</p>

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<p>(e) The Permittee shall report the results of performance tests and the associated fuel analyses within 60 days after the completion of the performance tests. This report must also verify that the operating limits for the boiler have not changed or provide documentation of revised operating limits established according to 40 CFR §63.7530 and Table 7 to Subpart DDDDD, as applicable. The reports for all subsequent performance tests must include all applicable information required in 40 CFR §63.7550.</p> <p>(f) The Permittee shall maintain on-site and submit, if requested by the Administrator, a report pertaining to the tune-up containing the information in 40 CFR §63.7540 (a)(10)(vi)(A) through (C).</p> <p>(g) Records indicating quantity, duration, and date of used oil burned in the boiler shall be maintained for a period of five (5) years from the date of generation of each record.</p> <p>(h) A Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include the following information for these emission units:</p> <p style="padding-left: 40px;">(1) A statement describing the emission monitoring that was required during the reporting period, whether all emission monitoring was completed as required, and if not, the date(s) and reasons(s) why the monitoring was not performed; and</p> <p style="padding-left: 40px;">(2) The date(s), nature, and results of any corrective action taken when (1) a deviation from an emission monitoring parameter was observed or (2) an inspection of the control device indicated that cleaning or emission-related maintenance was needed.</p> <p>(i) A Semiannual Compliance Report (SCR), shall be submitted no later than January 31st and July 31st after the end of each semiannual reporting period. The report shall include but is not limited to the following information for these emission units:</p> <p style="padding-left: 40px;">(1) If there are no deviations from any emission limitation (emission limit and operating limit) and there are no deviations from the requirements for work practice standards for periods of startup and shutdown in Table 3 to this subpart that apply to the Permittee, a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system, and operating parameter monitoring systems, were out-of-control as specified in 40 CFR §63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period; and</p>	<p>40 CFR §63.7515(f)</p> <p>40 CFR §63.7540</p> <p>ADEM Admin. Code r. 335-14-17</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>40 CFR §63.7550(a), (b), and (c)</p> <p>40 CFR 63, Subpart DDDDD, Table 9</p>

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<p>(2) If there is a deviation from any emission limitation (emission limit and operating limit) where the Permittee is not using a CMS to comply with that emission limit or operating limit, or a deviation from a work practice standard for periods of startup and shutdown, during the reporting period, the report must contain the information in 40 CFR §63.7550(d); and</p> <p>(3) If there were periods during which the CMSs, including continuous emissions monitoring system, continuous opacity monitoring system, and operating parameter monitoring systems, were out-of-control as specified in 40 CFR §63.8(c)(7), or otherwise not operating, the report must contain the information in 40 CFR §63.7550(e).</p>	<p>40 CFR 63, Subpart DDDDD, Table 9</p> <p>40 CFR 63, Subpart DDDDD, Table 9</p>

Emission Unit Nos. 009, 010 and 011 (Veneer Dryers)

Summary Page

Description: Westmill 20-Section, Coe 16-Section and 12-Section Steam-Heated Veneer Dryers with Hot Zones vented to RCO

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
RCO	Hot Zones vented to RCO	PM	2.16 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		PM ₁₀	6.31 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		PM _{2.5}	4.78 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		VOC	11.76 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		HAP	Reduce emissions of total HAP from hot zones, measured as THC (as carbon) by 90 percent and minimize fugitive emissions	40 CFR §63.2240 [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]
009	Cool Zone of 20-Section Dryer	VOC	2.0 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		HAP	Minimize fugitive emissions	40 CFR §63.2241 [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]
010	Cool Zone of 16-Section Dryer	VOC	1.60 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		HAP	Minimize fugitive emissions	40 CFR §63.2241 [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]
011	Cool Zone of 12- Section Dryer	VOC	1.20 lb/hr	ADEM Admin. Code r. 335-3-14-.04
		HAP	Minimize fugitive emissions	40 CFR §63.2241 [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]

Emission Unit Nos. 009, 010 and 011 (Veneer Dryers)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03 "Major Source Operating Permits."</p> <p>(b) These sources are subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD, and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.2290 and Table 10 of Subpart DDDD</p> <p>(a) These sources are subject to synthetic minor limitations to restrict its potential emissions under ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".</p> <p>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in excess of the amount determined by the use of the following equation:</p> $E = 3.59P^{0.62}$ <p>where E = Emissions in lb/hr</p> <p>P = Process Weight in T/hr.</p> <p>(b) The Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from these sources. At no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from these sources. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(81) and ADEM Admin. Code r. 335-3-11-.06(1)</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p>

Federally Enforceable Provisos	Regulations
<p>(b) If testing is required, the total particulate emission rate from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(c) If testing is required, the PM₁₀ and PM_{2.5} emission rates from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5 and 40 CFR Part 51, Appendix M, Method 202.</p> <p>(d) If testing is required, opacity from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(e) If testing is required, the volatile organic emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A, and reported as Pinenes.</p> <p>(f) When required, the Permittee shall conduct each performance test to determine compliance with 40 CFR 63, Subpart DDDD, according to the requirements in 40 CFR §63.7(e)(1), the requirements in paragraphs (b) through (o) of 40 CFR §63.2262, and according to the methods specified in Table 4 to Subpart DDDD.</p> <p>(g) The Permittee shall be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart when these units are operating, except as specified in §63.2250(f).</p> <p>(h) The Permittee shall always operate and maintain these units, including air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required in accordance with 40 CFR §63.2250(g).</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>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p>
<p>4. <u>Emission Monitoring</u></p> <p>(a) The Permittee shall maintain the 3-hour block average firebox/combustion chamber temperature at or above the minimum established according to 40 CFR §63.2262.</p> <p>(b) The Permittee shall check the activity level of a representative sample of the catalyst in the RCO and take any necessary corrective action to ensure that the catalyst is performing within its design range in accordance with Tables 2 and 7 to Subpart DDDD.</p> <p>(c) The Permittee shall install, operate, and maintain a monitoring device for the firebox/combustion chamber temperature of the RCO according to the applicable requirements listed in 40 CFR §63.2269(a) through (b).</p>	<p>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p>

Federally Enforceable Provisos	Regulations
<p>(d) The Permittee shall monitor and collect data of the 3-hour block average firebox/combustion chamber temperature of the RCO according to the applicable requirements listed in 40 CFR §63.2270 and Table 7 to Subpart DDDD.</p> <p>(e) The Permittee shall reduce the firebox/combustion chamber temperature monitoring system data to the specified averages in units of the applicable requirement according to calculations in 40 CFR §63.2270.</p>	<p>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) The Permittee shall maintain all of the applicable records specified in 40 CFR §63.2282 and Tables 7 and 8 to Subpart DDDD. These records shall be in a form suitable and readily available for an expeditious review. Each record shall be retained for a period of 5 years from the date of generation of each record. Each record shall be retained on-site for at least 2 years from the date of generation of each record, and may be retained off-site for the remaining 3 years.</p> <p>(b) The Permittee shall submit all of the applicable notifications specified in 40 CFR §63.2280. These notifications include, but may not be limited to:</p> <p>(1) A written notification of the intent to conduct a performance test to the Air Division at least 60 days prior to conducting a performance test. The notification shall include a copy of the site-specific test plan required by 40 CFR §63.7(c)(2).</p> <p>(2) A written notification of the intent to modify or replace the control system for these sources to the Air Division at least 30 days prior to taking any action.</p> <p>(3) A written notification of the intent to change the continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for these sources or their control device to the Air Division at least 30 days prior to making any change.</p>	<p>ADEM Admin. Code r. 335-3-11-.06(81)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81)</p>
<p>(c) 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 1st – June 30th and July 1st– December 31st). The report shall include the following information for this emission unit:</p> <p>(1) A statement as to whether all monitoring was completed as required, and if not the date(s) and reason(s) why the monitoring was not performed; and</p> <p>(2) The date(s), time, nature, and results of any corrective action taken for monitoring excursions.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p>

Federally Enforceable Provisos	Regulations
<p>(d) The Permittee shall submit all of the applicable reports specified in 40 CFR §63.2281 and Table 9 to Subpart DDDD. These reports include, but may not be limited to a semiannual compliance report which contains the information in 40 CFR §63.2281(c) through (g), as applicable. The reporting period shall be commensurate with the Semiannual Monitoring Report noted above and submitted no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st– December 31st).</p>	<p>ADEM Admin. Code r. 335-3-11-.06(81)</p>

Emission Unit Nos. 012 and 013 (Plywood Presses)

Summary Page

Description: Two (2) 44-Opening, 30 MSF/hr Steam-Heated Plywood Presses

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
012	No. 1 Plywood Press Exhaust	PM	$E=3.59P^{0.62}$	ADEM Admin. Code r. 335-3-4-.04
		VOC	N/A	N/A
		HAP	N/A	N/A
013	No. 2 Plywood Press Exhaust	PM	$E=3.59P^{0.62}$	ADEM Admin. Code r. 335-3-4-.04
		VOC	N/A	N/A
		HAP	N/A	N/A

Emission Unit Nos. 012 and 013 (Plywood Presses)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) These processes are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) These processes are subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD, and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.2290 and Table 10 of Subpart DDDD</p> <p>(c) These sources are subject to synthetic minor limitations to restrict their potential emissions under ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".</p> <p>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter in excess of the amount determined by the use of the following equation:</p> $E = 3.59P^{0.62}$ <p>where E = Emissions in lb/hr</p> <p>P = Process Weight in T/hr.</p> <p>(b) The Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from these sources. At no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from these sources. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.</p> <p>(c) The combined production of plywood from these units shall not exceed 280,000 MSF on a 3/8" basis during any consecutive 12-month period.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the total particulate emission rate from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(81) and ADEM Admin. Code r. 335-3-11-.06(1)</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>(b) If testing is required, the emissions of PM₁₀ and PM_{2.5} from these units shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5, or 40 CFR Part 51, Appendix M, Method 201A and 40 CFR Part 51, Appendix M, Method 202.</p> <p>(c) If testing is required, the opacity from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(d) If testing is required, the volatile organic emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A.</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>4. <u>Emission Monitoring</u></p> <p>Within 10 days of the end of each month, the Permittee shall calculate the total production of plywood for the previous month and previous 12-month period and determine compliance with the production limit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) The Permittee shall maintain records of the monthly and 12-month rolling total production for these processes and shall retain the information in a form suitable for inspection for a period of five years from the date of generation of each record.</p> <p>(b) For the emission monitoring performed in accordance with Proviso No. 4 above, 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 1st – June 30th and July 1st – December 31st). The report shall include:</p> <p>(1) Each of the calculated 12-month rolling totals (SF) of plywood produced during the reporting period.</p> <p>(2) A statement as to whether any of the 12-month rolling totals (SF) of plywood production calculated during the reporting period exceeded 280,000 MSF, and if so, the date of the exceedance(es).</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>

Emission Unit Nos. 017, 021, and 022 (Plywood Mill Operations)

Summary Page

Description: Plywood Mill Operations Controlled by Three (3) Baghouses
Baghouse No. 1, EU-021 (Core Saw, Flying Saw, Panel Saw, and Dry Hog Inlet, PET saw)
Baghouse No. 2, EU-017 (Sander)
Baghouse No. 3, EU-022 (Spec Saw)

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
EU-021	Baghouse No. 1	PM	$E = 3.59(P)^{0.62}$	ADEM Admin. Code r. 335-3-4-.04(1)
EU-017	Baghouse No. 2	PM	$E = 3.59(P)^{0.62}$	ADEM Admin. Code r. 335-3-4-.04(1)
EU-022	Baghouse No. 3	PM	$E = 3.59(P)^{0.62}$	ADEM Admin. Code r. 335-3-4-.04(1)

Emission Unit Nos. 017, 021, and 022 (Plywood Mill Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) These sources are subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD, and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.2290 and Table 10 of Subpart DDDD</p> <p>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall not cause or allow the emission of particulate matter from these sources in excess of the amount determined by the use of the following equation:</p> $E = 3.59P^{0.62}$ <p>where E = Emissions in lb/hr</p> <p>P = Process Weight in T/hr.</p> <p>(b) The Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from these sources. At no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from these sources. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the total particulate emission rate from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the emissions of PM₁₀ and PM_{2.5} from this unit shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A or 40 CFR Part 60, Appendix A, Method 5.</p> <p>(c) If testing is required, the opacity from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(81) and ADEM Admin. Code r. 335-3-11-.06(1)</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.01</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>

Federally Enforceable Provisos	Regulations
<p>4. <u>Emission Monitoring</u></p> <p>(a) At least once per week during daylight hours, Permittee personnel shall observe the baghouses (while the process is operating) for visible emissions.</p> <p>(b) Whenever visible emissions are observed from the baghouses, corrective action shall be initiated as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been eliminated.</p> <p>(c) The baghouses shall be inspected for proper operation and cleaned at least annually, but more frequently whenever visible emissions are observed. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours from the completion of the inspection.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) For the emission monitoring performed in accordance with Section 4 above, the Permittee shall maintain records 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> <ol style="list-style-type: none"> (1) The date, time, and results of any monitoring performed; (2) The date(s), time, nature, and results of any corrective action taken when an excursion from a monitoring parameter occurs. (3) The dates, times and results of inspections and cleanings conducted on the baghouse systems. <p>(b) For the emission monitoring performed in accordance with Proviso No. 4 above, 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 1st – June 30th and July 1st – December 31st). The report shall include the following information for these emission units:</p> <ol style="list-style-type: none"> (1) A statement as to whether all observations for visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed; (2) A statement as to whether the annual inspection of the baghouse systems were accomplished during the reporting period, and if so, the date and results of the 	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>

Federally Enforceable Provisos	Regulations
<p>inspection;</p> <p>(3) The date(s), time, nature, and results of any corrective action taken when (1) visible emissions were observed from the baghouses or (2) an inspection of the baghouse system indicated that cleaning or emissions-related maintenance was needed.</p>	

Emission Unit Nos. 023, 025, 027, 028, and 029 (Miscellaneous Coating Operations)

Summary Page

Description: Plywood Patch Station, Logo Paint Station, Grade Stamping, Moldicide Station and Plyform Oil Station

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
023	Plywood Patch Station	HAP	N/A	N/A
025	Logo Paint Station	HAP	Use of Non-HAP Coatings	40 CFR Part 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]
027	Grade Stamping	HAP	Use of Non-HAP Coatings	40 CFR Part 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]
028	Moldicide Station	HAP	N/A	N/A
029	Plyform Oil Station	HAP	Use of Non-HAP Coatings	40 CFR Part 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)]

Emission Unit Nos. 023, 025, 027, 028, and 029 (Miscellaneous Coating Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) These miscellaneous coating operations are subject to the applicable requirements of 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD. The Logo Paint Station, Grade Stamping and Plyform Oil Station meet the definition of a Group 1 Miscellaneous Coating Operation. The Plywood Patch Station, and Moldicide Station do not meet the definition of a Group 1 Miscellaneous Coating Operation.</p> <p>2. <u>Emission Standards</u></p> <p>The permittee shall only use non-HAP coatings, as defined in 40 CFR §63.2292, for the Group 1 Miscellaneous Coating Operations (i.e. Logo Paint Station, Grade Stamping and Plyform Oil Station). <i>Non-HAP coating</i> means a coating with HAP contents below 0.1 percent by mass for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>If testing is required, the volatile organic emissions from these processes shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A.</p> <p>4. <u>Emission Monitoring</u></p> <p>For the Group 1 Miscellaneous Coating Operations (i.e. Logo Paint Station, Grade Stamping and Plyform Oil Station), the permittee shall maintain records (e.g. safety data sheets) showing that the coatings used in these operations are non-HAP coatings as defined in 40 CFR §63.2292.</p> <p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) For the Group 1 Miscellaneous Coating Operations (i.e. Logo Paint Station, Grade Stamping and Plyform Oil Station), the permittee shall maintain records (e.g. safety data sheets) showing that the coatings used in these operations are non-HAP coatings as defined in 40 CFR §63.2292.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(81) and ADEM Admin. Code r. 335-3-11-.06(1)</p> <p>ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD</p> <p>ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD</p>

Federally Enforceable Provisos	Regulations
<p>(b) The Permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso 21(a), no later than 60 days after the end of each reporting period (January 1st – June 30th and July 1st – December 31st). The report shall include a statement as to whether the coatings utilized in the Group 1 Miscellaneous Coating Operations during the reporting period were non-HAP coatings as defined in 40 CFR §63.2292.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p>

Emission Unit No. 024 (Plywood Resin Tank)

Summary Page

Description: 15,000-Gallon Resin Storage Tank

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
024	Plywood Resin Tank	HAP	N/A	N/A

Emission Unit No. 024 (Plywood Resin Tank)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
1. <u>Applicability</u>	
(a) This tank is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-16-.03
(b) This tank is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD, and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.2290 and Table 10 of Subpart DDDD	ADEM Admin. Code r. 335-3-11-.06(81) and ADEM Admin. Code r. 335-3-11-.06(1)
2. <u>Emission Standards</u>	
There are no applicable emissions standards associated with this tank.	N/A
3. <u>Compliance and Performance Test Methods and Procedures</u>	
There are no applicable testing requirements associated with this tank.	N/A
4. <u>Emission Monitoring</u>	
There are no applicable emission monitoring requirements associated with this tank.	N/A
5. <u>Recordkeeping and Reporting Requirements</u>	
There are no applicable recordkeeping or reporting requirements associated with this tank.	N/A

Emission Unit No. 016 Fuel House w/Cyclone

Summary Page

Description: Fuel House w/Cyclone

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
016A	Fuel House Cyclone	PM	$E = 3.59(P)^{0.62}$	ADEM Admin. Code r. 335-3-4-.04(1)
			9.5 lb/hr	ADEM Admin. Code r. 335-3-14-.04

Emission Unit No. 016 Fuel House w/Cyclone

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
1. <u>Applicability</u>	
(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-16-.03
(b) This unit is subject to synthetic minor limitations to restrict its potential emissions under ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".	ADEM Admin. Code r. 335-3-14-.04
2. <u>Emission Standards</u>	
(a) The Permittee shall not cause or allow the emission of particulate matter from this unit in excess of the amount determined by the use of the following applicable equation: $E = 3.59P^{0.62} \text{ (where } P < 30 \text{ T/hr) or}$ $E = 17.31(P)^{0.16} \text{ (where } P \geq 30 \text{ T/hr)}$ where E = Emissions in lb/hr P = Process Weight in T/hr.	ADEM Admin. Code r. 335-3-4-.04(1)
(b) The Permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from this unit. At no time shall the Permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from this unit. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-4-.01
(c) The Permittee shall not cause or allow the emission of particulate matter in any one hour from this unit in excess of 9.5 lb/hr.	ADEM Admin. Code r. 335-3-14-.04
3. <u>Compliance and Performance Test Methods and Procedures</u>	
(a) If testing is required, the total particulate emission rate from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1-.05
(b) If testing is required, the emissions of PM ₁₀ and PM _{2.5} from this unit shall be determined in accordance with 40 CFR Part 51, Appendix M, Method 201A or 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1-.05
(c) If testing is required, the opacity from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-1-.05

Federally Enforceable Provisos	Regulations
<p>4. <u>Emission Monitoring</u></p> <p>(a) At least once per week during daylight hours, Permittee personnel familiar with the processes shall observe the cyclone (while the process is operating) for greater than normal visible emissions as determined by previous observations of normal operations.</p> <p>(b) Whenever observed visible emissions are greater than normal from the cyclone, corrective action shall be initiated as soon as practicable but no longer than 24 hours from the time of observation, followed by an additional observation to confirm that emissions have been reduced to normal.</p> <p>(c) The cyclone shall be inspected for proper operation and cleaned at least annually, but more frequently whenever visible emissions are observed to be greater than normal. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours from the completion of the inspection.</p>	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) For the emission monitoring performed in accordance with Section 4 above, the Permittee shall maintain records 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"> (i) The date, time, and results of any monitoring performed; (ii) The date(s), time, nature, and results of any corrective action taken when an excursion from a monitoring parameter occurs. (iii) The dates, times and results of inspections and cleanings conducted on the cyclone system. <p>(b) For the emission monitoring performed in accordance with Proviso No. 4 above, 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 1st– June 30th and July 1st – December 31st). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> (i) A statement as to whether all observations for visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed; (ii) A statement as to whether the annual inspection of the cyclone system was accomplished during the reporting 	<p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin. Code r. 335-3-16-.05</p>

Federally Enforceable Provisos	Regulations
<p>period, and if so, the date and results of the inspection;</p> <p>(iii) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed from the cyclone or (2) an inspection of the cyclone system indicated that cleaning or emissions-related maintenance was needed.</p>	

Emission Unit No. 026 (Fire Water Pump)

Summary Page

Description: 230 Hp Diesel-Fired Fire Water Pump

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
026	Fire Water Pump	HAP	N/A	N/A

Emission Unit No. 026 (Fire Water Pump)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></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 applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 8 to Subpart ZZZZ.</p> <p>2. <u>Emission Standards</u></p> <p>(a) The Permittee shall comply with the applicable requirements of 40 CFR §63.6602 and Table 2c to Subpart ZZZZ, which include, but may not be limited to:</p> <p>(1) Meet the following work practice requirements, except during periods of startup:</p> <p>(i) Change oil and filter every 500 hours of operation or annually, whichever comes first;</p> <p>(ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and</p> <p>(iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</p> <p>(2) During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(103)</p> <p>40 CFR §63.6602</p>

Federally Enforceable Provisos	Regulations
<p>(3) If a unit is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.</p> <p>(b) The Permittee shall not operate this unit except as provided in §63.6640(f)(1) through (f)(4), which include but may not be limited to:</p> <p>(1) Emergency situations;</p> <p>(2) Maintenance checks and readiness testing, not to exceed 100 hours per year; and</p> <p>(3) Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing).</p>	
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p>	
<p>There are no performance test methods or procedures associated with this unit.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p>	
<p>(a) The Permittee shall operate and maintain this unit according to the manufacturer's emission-related written instructions <u>or</u> develop a maintenance plan that provides for, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</p>	<p>40 CFR §63.6625(e) & 40 CFR §63.6640(a)</p>
<p>(b) The Permittee shall install a non-resettable hour meter on this unit if one is not already installed.</p>	<p>40 CFR §63.6625(f)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) The Permittee shall keep records of the operation and maintenance of this unit in accordance with 40 CFR §63.6655. At a minimum, these records shall include:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c) and 40 CFR §63.6655</p>

Federally Enforceable Provisos	Regulations
<p>(1) For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as “emergency operation,” the records shall reflect what classified the operation as emergency;</p> <p>(2) The total number of hours the engine was operated during a calendar year subtotaled by the reason the engine was in operation;</p> <p>(3) The dates of each oil and filter change with the corresponding hour on the hour meter;</p> <p>(4) The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and</p> <p>(5) The dates and nature of other emission-related repairs and maintenance performed.</p> <p>(b) The Permittee shall maintain on-site for the life of this unit either a copy of the manufacturer’s emission-related operation and maintenance instructions for each unit or the maintenance plan developed in accordance with §63.6625(e) for each unit.</p> <p>(c) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63, Subparts A and ZZZZ for this unit recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on-site. The remaining 3 years of data may be retained off-site.</p> <p>(d) The Permittee shall report to the Air Division any failure to perform a work practice on the schedule required, including instances when the work practice standard was not performed due to emergency operation or unacceptable risk under a federal, state, or local law. The Permittee shall submit the report within two working days of the deviation and shall provide an explanation as to why the work practice requirement was not performed.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c), 40 CFR §63.6660, and 40 CFR §63.10(b)(1)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c) and 40 CFR §63.6640(b)</p>

Emission Unit No. 030 (Emergency Generator)

Summary Page

Description: 682 Hp Diesel-Fired Emergency Generator

Permitted Operating Schedule: 500 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
030	Emergency Generator	HAP	N/A	N/A

Emission Unit No. 030 (Emergency Generator)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
1. <u>Applicability</u>	
(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-16-.03
(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.	ADEM Admin. Code r. 335-3-11-.06(103)
(c) This unit is subject to synthetic minor limitations to restrict its potential emissions under ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".	ADEM Admin. Code r. 335-3-14-.04
2. <u>Emission Standards</u>	
(a) The Permittee shall not operate the emergency generator more than 500 hours during any 12-month consecutive period.	ADEM Admin. Code r. 335-3-14-.04
(b) This engine is an affected source under the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ. This engine is classified as an existing emergency compression ignition (CI) stationary RICE >500 HP located at a major source of HAP emissions. In accordance with §63.6590(b)(3), the permittee is <u>not</u> subject the requirements of this subpart and of subpart A of this part, including initial notification requirements, for this engine provided the permittee complies with the following criteria for this engine:	40 CFR Part 63, Subpart ZZZZ
(1) The permittee shall operate this engine in accordance with the criteria specified in the definition of "emergency stationary RICE" in §63.6675;	
(2) The permittee shall operate this engine only for the purposes and durations described in §63.6640(f)(1) through (4), which include emergency situations, maintenance checks and readiness testing, emergency demand response, and operation in non-emergency situations for up to 50 hours per year; and	
(3) The permittee shall not operate or shall not contractually obligate the engine to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii).	

Federally Enforceable Provisos	Regulations
<p>(c) If the permittee does not operate this engine according to the requirements in paragraphs §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.</p>	<p>40 CFR Part 63, Subpart ZZZZ</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p>	
<p>There are no performance test methods or procedures associated with this unit.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p>	
<p>There are no monitoring requirements associated with this unit.</p>	<p>N/A</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p>	
<p>(a) Should this unit exceed any operational limitation, at any time, the Permittee shall notify the Air Division within two working days of determining that the exceedance occurred.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>
<p>(b) The Permittee shall calculate and record this unit's hours of operation within ten days of the last day of each month. For a period of 5 years following the date of documentation, records of the unit's hours of operation shall be maintained in a form suitable for inspection and made readily available for review.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p>

Emission Unit No. 031 (Server and Scale House Emergency Generators)

Summary Page

Description: 23.6 Hp Propane-Fired Server Emergency Generator

21.5 Hp Propane Fired Scale House Emergency Generator

Permitted Operating Schedule: 8,760 hr/yr

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
031A	Server Emergency Generator	HAP	N/A	N/A
031B	Scale House Emergency Generator	HAP	N/A	N/A

Emission Unit No. 031 (Server and Scale House Emergency Generators)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) These units are 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.</p> <p>(c) These units are subject to the applicable requirements of the National Emission Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ.</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(88)</p>
<p>2. <u>Emission Standards</u></p> <p>There are no emission standards associated with these units.</p>	
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>There are no performance test methods or procedures associated with these units.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p> <p>There are no monitoring requirements associated with these units.</p>	<p>N/A</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>The Permittee shall maintain records of the date, time, duration, and purpose of operation each time these units are 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.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Provisos for Facility-Wide Fugitive Dust Plan

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></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>2. <u>Emission Standards</u></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>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>The Permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p> <p>4. <u>Emission Monitoring</u></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>5. <u>Recordkeeping and Reporting Requirements</u></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-.03</p> <p>ADEM Admin. Code r. 335-3-4-.02</p> <p>ADEM Admin. Code r. 335-3-16-.07</p> <p>ADEM Admin. Code r. 335-3-16-.05</p> <p>ADEM Admin Code r. 335-3-16-.05</p>

Appendix A

Fugitive Dust Plan

**BOISE CASCADE WOOD PRODUCTS
CHAPMAN PLYWOOD
CHAPMAN, ALABAMA**

Fugitive Dust Control Plan

Facility No. 203-S001

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

September 11, 2024

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APPENDICES

APPENDIX A	Facility Map
APPENDIX B	Inspection Sheet

1.0 GENERAL INFORMATION

This facility is located in Chapman, Butler County, Alabama. The approximate center of the plant site is at 31° 40' 20" N and 86° 42' 46" W (NAD27). 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 and plywood. The operations are described at Standard Industrial Classification (SIC) Code 2436. As a result of the 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. 203-S001. 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

There are several mechanical conveyance system is used to deliver wood residue fuel consisting of chips and sawdust to the wood-fired boilers 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 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. ***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. ***Dust Suppression*** - Boise will use water or other approved suppression liquids to 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. 203-S001.

3.3 Training

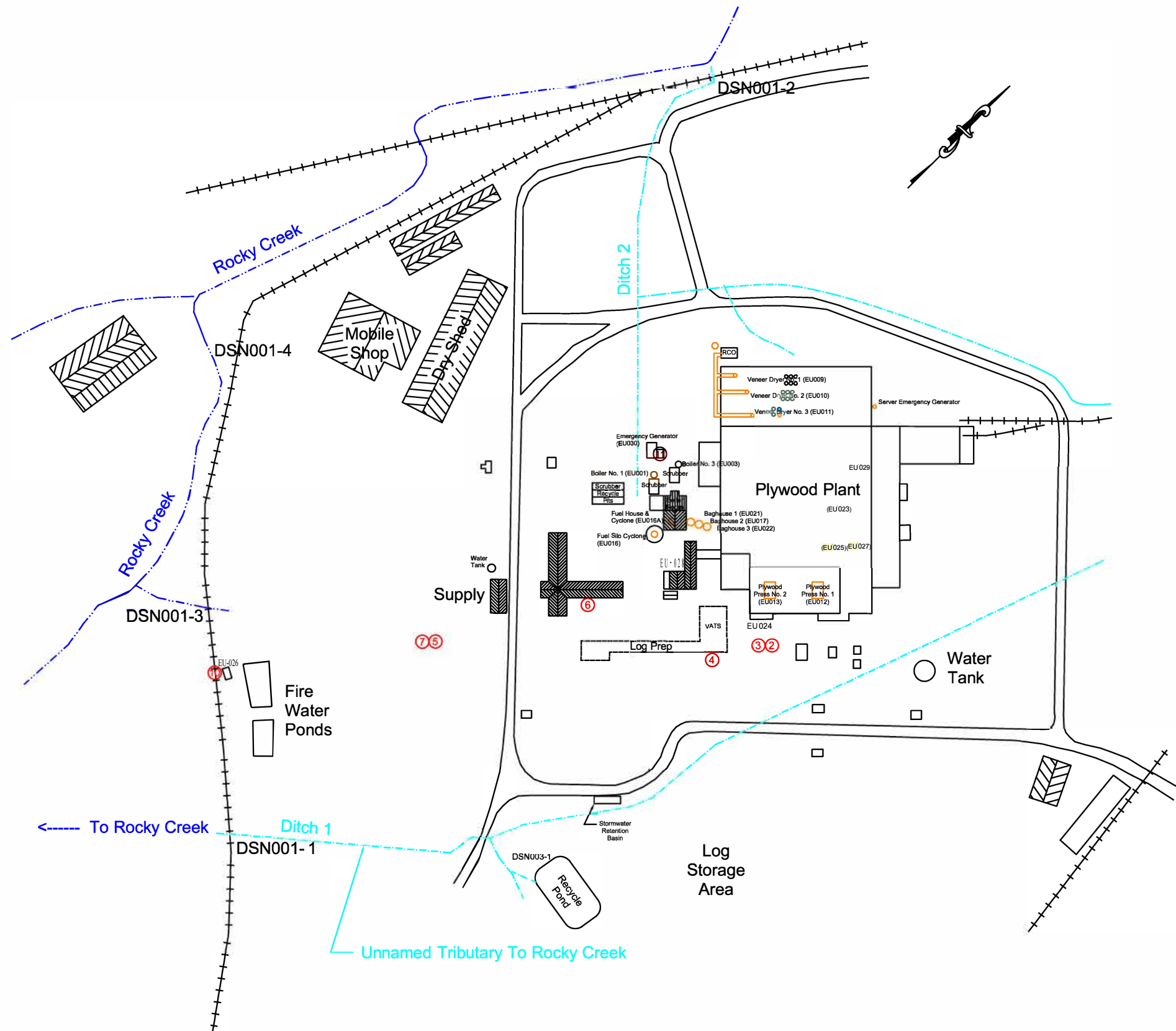
Initial training will be provided to the facility personnel responsible for fugitive dust control implementation and maintenance. Annual refresher training will be provided. The contents of this training will include fugitive dust sources, fugitive dust control measures, housekeeping practices, and the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

Revision Date	Description of Changes	Prepared By:

Appendix A



Emission Unit Legend

Boiler No. 1	EU-001
Boiler No. 3	EU-003
Veneer Dryer No. 1	EU-009
Veneer Dryer No. 2	EU-010
Veneer Dryer No. 3	EU-011
Plywood Press No. 1	EU-012
Plywood Press No. 2	EU-013
Plywood Baghouse No. 1	EU-021
Plywood Baghouse No. 2	EU-017
Plywood Baghouse No. 3	EU-022
Plywood Patch Station	EU-023
Logo Paint Station	EU-025
Grade Stamping	EU-027
Moldicide Station	EU-028
Plyform Oil Station	EU-029
Plywood Resin Tank	EU-024
Emergency Fire Pump Engine	EU-026
Emergency Generator	EU-030
Server Emergency Generator	

Tank Legend

②	Lube Oil Tank	3,000 gal
③	Lube Oil Tank	4,000 gal
④	Diesel Fuel Tank	250 gal
⑤	Gasoline Tank	1,000 gal
⑥	Used Oil Tank	2,000 gal
⑦	Diesel Fuel Tank	4,000 gal
⑩	Diesel Fuel Tank	250 gal
⑪	Diesel Fuel Tank	250 gal

Boise Cascade Wood Products, LLC
Chapman, Alabama

SCALE: 1" = 200'	APPROVED BY:	DRAWN BY: CHR
DATE: 06/27/2024		

Site Drawing

H. M. ROLLINS CO., INC. GULFPORT, MISSISSIPPI	DRAWING NUMBER 20240627
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Appendix B

Boise Cascade Wood Products
Chapman, Alabama
Weekly Fugitive Dust Control Inspection Sheet

		Fugitive Dust Sources			
		Mechanical Conveyance Systems		Roads	
Inspector	Date	Excessive Fugitive Dust Visible From System? Yes or No	Housekeeping Needed? Yes or No (If Yes, make entry below with actions taken.)	Excessive Fugitive Dust Visible From System? Yes or No	Housekeeping Needed? Yes or No (If Yes, make entry below with actions taken.)

Housekeeping Conducted (Include Source): _____
