



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: NSSG HOLDINGS, LLC

FACILITY NAME: SCOTCH GULF LUMBER, LLC - FULTON

FACILITY/PERMIT NO.: 102-S003

LOCATION: FULTON, CLARKE COUNTY, ALABAMA

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

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

Issuance Date: DRAFT

Effective Date: DRAFT

Expiration Date: DRAFT

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General Permit Provis

	Federally Enforceable Provisos	Regulations
1.	<u>Transfer</u>	
	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. 335-3-1613(1)(a)5.	ADEM Admin. Code r. 335-3-1602(6)
2.	Renewals	
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code r. 335-3-1612(2)
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3.	Severability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code r. 335-3-1605(e)
4.	Compliance	
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code r. 335-3-1605(f)
	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code r. 335-3-1605(g)

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General	Permit	Provisos
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	Federally Enforceable Provisos	Regulations
5.	Termination for Cause	
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code r. 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code r. 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Air Division, within 30 days or for such other reasonable time as the Air Division may set, any information that the Air Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Air Division copies of records required to be kept by this permit.	ADEM Admin. Code r. 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code r. 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness	
	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	ADEM Admin. Code r. 335-3-1607(a)
10	. Inspection and Entry	
	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	ADEM Admin. Code r. 335-3-1607(b)

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General Permit Provisos	
Federally Enforceable Provisos	Regulations
(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. Compliance Provisions	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	ADEM Admin. Code r. 335-3-1607(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. Compliance Certification	
The permittee shall submit a complete and accurate compliance certification by December 22nd of each year for each annual reporting period of this permit (October 24 th through October 23 rd .	ADEM Admin. Code r. 335-3-1607(e)
(a) The compliance certification shall include the following:	
(1) The identification of each term or condition of this permit that is the basis of the certification;	
(2) The compliance status;	
(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. 335-3-1605(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;	
(b) The compliance certification shall be submitted to:	

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Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463	
and to:	
EPA Region 4 via email at EPA_R4_CAA_Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)	
3. Reopening for Cause	
Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:	ADEM Admin. Code 1 335-3-1613(5)
(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 no 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.	g 1 r
(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.	r ,
(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 of conditions of this permit.	e
(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	

This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

§22-28-16(d), <u>Code of Alabama 1975</u>, as amended

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Federally Enforceable Provisos Regulations 15. Equipment Maintenance or Breakdown (a) In case of shutdown of air pollution control equipment (which ADEM Admin. Code r. operates pursuant to any permit issued by the Director) for 335-3-1-.07(1),(2) 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: (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. (b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected. 16. Operation of Capture and Control Devices All air pollution control devices and capture systems for which §22-28-16(d), Code of this permit is issued shall be maintained and operated at all times Alabama 1975, as in a manner to minimize the emissions of air contaminants. amended Procedures for ensuring that the above equipment is properly operated and maintained to minimize the emission of air contaminants shall be established.

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17. Obnoxious Odors			
This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	ADEM Admin. Code r. 335-3-108		
18. Fugitive Dust			
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code r. 335-3-402		
(b) Plant or haul roads and grounds shall be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:			
(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;			
(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;			
(3) By paving;			
(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.			
Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Air Division prior to utilization.			
19. Additions and Revisions			
Any modifications to this source shall comply with the modification procedures in Rules 335-3-1613 or 335-3-1614.	ADEM Admin. Code r. 335-3-1613 and 335-3-1614		

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20. <u>Re</u>	cordkeeping Requirements	
(a)	Records of required monitoring information of the source shall include the following:	ADEM Admin. Code r. 335-3-1605(c)2.
	(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.	
(b)	Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21. <u>Re</u>	porting Requirements	
(a)	Reports to the Air Division of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code r. 335-3-1604(9).	ADEM Admin. Code r. 335-3-1605(c)3.
(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report shall include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22. <u>En</u>	nission Testing Requirements	
wit equ pro	ch point of emission which requires testing shall be provided h sampling ports, ladders, platforms, and other safety aipment to facilitate testing performed in accordance with occdures established by Part 60 of Title 40 of the Code of deral Regulations, as the same may be amended or revised.	ADEM Admin. Code r. 335-3-105(3) and 335-3-104(1)

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The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.	
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	ADEM Admin. Code r. 335-3-104
(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 require 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.	
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.	ADEM Admin. Code r. 335-3-104
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.	

23. Payment of Emission Fees

(a) The permittee shall submit 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.

ADEM Admin. Code r. 335-1-7-.04

ADEM Admin. Code r. 335-1-7-.05

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24. Other Reporting and Testing Requirements	
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.	ADEM Admin. Code r. 335-3-104(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.	ADEM Admin. Code r. 335-3-1605(a)
No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.	
The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR § 82.166. Reports shall be submitted to the US EPA and the Department as required.	
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR § 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:	40 CFR Part 68
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.	
(b) The owner or operator shall submit one of the following:	
(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a) or,	
(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27. Display of Permit	
This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.	ADEM Admin. Code r. 335-3-1401(1)(d)

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28. <u>Circumvention</u>	
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 contaminants emitted, conceals or dilutes any emission of the air contaminant which would otherwise violate the Division 3 rules and regulations.	ADEM Admin. Code r. 335-3-110
29. Visible Emissions	
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.	ADEM Admin. Code r. 335-3-401(1)
30. Fuel-Burning Equipment	
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. 335-3-403.	ADEM Admin. Code r. 335-3-403
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. 335-3-501.	ADEM Admin. Code r. 335-3-501
31. Process Industries - General	
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. 335-3-404.	ADEM Admin. Code r. 335-3-404
32. Averaging Time for Emission Limits	
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.	ADEM Admin. Code r. 335-3-105
33. Open Burning	
Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.	ADEM Admin. Code r. 335-3-301

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34. Permit Shield	

General Permit Provisos

A permit shield exists under this operating permit in accordance with ADEM Administrative Code r. 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in the Regulatory Review Section of the application for this permit. Under this shield, it has been determined that requirements listed as non-applicable in such a section are not applicable to this source.

ADEM Admin. Code r. 335-3-16-.10

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Emission Unit No. 006 (Green Sawdust Fuel Silo No. 1 with Target Box) Summary Page

Description: Green Fuel Silo with Pneumatic Conveyance System to a Target Box

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8,760 \text{ Hours}}{\text{Year}}$$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
EU 006	Green Fuel Silo No. 1 with Target Box	TSP	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
			0.9 lb/hr	ADEM Admin. Code r. 335-3-1404 SMS
		PM ₁₀	0.0133 lb/hr	ADEM Admin. Code r. 335-3-1404 SMS
		PM _{2.5}	0.0009 lb/hr	ADEM Admin. Code r. 335-3-1404 SMS

Emission Unit No. 006 (Green Sawdust Fuel Silo No. 1 with Target Box) Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	Applicat	pility	
		This source is subject to the applicable requirements of Rule 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code r. 335-3-1603
	i	This process is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP, PM_{10} and $PM_{2.5}$ established at ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD)).	ADEM Admin. Code r. 335-3-1404
2.	Emissio	n Standards	
	1	The permittee shall not cause or allow the emission of particulate matter (as TSP) in any one hour from any process in excess of the amount determined by the following equations:	ADEM Admin. Code r. 335-3-404(1)
		E= 17.31P ^{0.16} (P≥30 TPH) or	
		E= 3.59P ^{0.62} (P<30 TPH)	
		Where:	
		E = Emissions (in pounds per hour)	
		P = Process weight (in tons per hour)	
	1	The permittee shall not cause or allow visible emissions with a six-minute average opacity greater than 20% to be emitted more than once during any 60-minute period. The permittee shall not cause or allow visible emissions with a six-minute average opacity of greater than 40% to be emitted at any time.	ADEM Admin. Code r. 335-3-401
		The permittee shall not cause or allow emissions of TSP from this process to exceed 0.9 lb/hr.	ADEM Admin. Code r. 335-3-1404
		The permittee shall not cause or allow emissions of PM_{10} from this process to exceed 0.0133 lb/hr.	ADEM Admin. Code r. 335-3-1404
		The permittee shall not cause or allow emissions of $PM_{2.5}$ from this process to exceed 0.0009 lb/hr.	ADEM Admin. Code r. 335-3-1404
3.	Complia	nce and Performance Test Methods and Procedures	
	,	If testing is required, Total particulate emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-105

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	Federally Enforceable Provisos	Regulations
(b	If testing is required, PM_{10} emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A.	ADEM Admin. Code r. 335-3-105
(c) If testing is required, $PM_{2.5}$ emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A.	ADEM Admin. Code r. 335-3-105
(d	Opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105
(e	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, (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source in in compliance.	ADEM Admin. Code r. 335-3-105
4. Emiss	ion Monitoring	
(a	While the process is operating, someone familiar with the process shall observe the visible emissions from the target box, fuel silo vents and exhaust at least weekly during daylight hours for any visible emissions.	ADEM Admin. Code r. 335-3-1605(c)
(b	Whenever visible emissions are observed, 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.	ADEM Admin. Code r. 335-3-401
(c	The target box and associated pneumatic lines shall be physically inspected to assure that the device has been properly maintained and operates as designed at least annually, but more frequently whenever visible emissions are observed from the target box, fuel silo's vents and exhaust. If the results of the inspection indicate that cleaning or maintenance is needed, such action should be initiated, as soon as practicable but no longer than 24 hours from the completion of inspection.	
5. Recor	lkeeping and Reporting Requirements	
(a	The permittee shall maintain the following records for this process in a permanent form and readily available for inspection for at least five (5) years from the date of generation of each record:	ADEM Admin. Code r. 335-3-1605(c)
	(1) The date, time, and results of each visible emissions observation;	
	(2) The date(s), time, duration, and cause of any excursion from a monitoring parameter;	

Federally Enforceable Provisos	Regulations
(3) The dates of the annual inspections of the target box and pneumatic lines and whether the inspection indicated that cleaning or emission-related maintenance was needed; and	
(4) The date(s), time, nature, and results of emission-related corrective action(s) taken (including cleaning).	
(b) The permittee shall submit a Semiannual Monitoring Report to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1 st – June 30 th and July 1 st – December 31 st). This report shall include:	ADEM Admin. Code r. 335-3-1605(c)
(1) A statement as to whether all emission observations were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;	
(2) The date(s), time, nature, and results of any corrective action taken when (1) any visible emissions were observed from the target box or the silo vents, or (2) an inspection indicated that cleaning or emissions-related maintenance was needed; and	
(3) A statement as to whether the annual inspection of the target boxes and associated pneumatic lines was accomplished during the reporting period, and if so, the date and results of the inspection	

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Emission Unit No. 007 (Continuos Dry Kiln No. 4) Summary Page

Description: One 100 MMBF/yr Continuous Direct-Fired Lumber Dry Kiln (CDK) with a

Sawdust-fired 40 MMBtu/hr Burner

Operating Capacity: 11.4 MBF/hr

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8,760 \text{ Hours}}{\text{Year}}$$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		TQD	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
	Description Pollutant Emission limit $E=3.59P^{0.62} \text{ or } E=17.31P^{0.16}$ 1.6 lb/hr PM ₁₀ PM_{10} $PM_{2.5}$ 1.13 lb/hr SO_2 $4.0 \text{ lb/MMBturbeat input}$	1.6 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)	
ODK 4		PM ₁₀	1.2 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
CDK-4 (EU007)	Continuous Dry Kiln # 4	PM _{2.5}	1.13 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
		SO_2	4.0 lb/MMBtu heat input	ADEM Admin. Code r. 335-3-404 (SIP)
		VOC	4.0 lb/MBF as WPP1	ADEM Admin. Code r. 335-3-1106 (BACT)
		НАР	N/A	40 CFR Part 63 Subpart DDDD

Emission Unit No. 007 (Continuous Dry Kiln) Unit Specific Provisos

	Federally Enforceable Provisos	Regulations
1.	Applicability	
	(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-31603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b) This unit is subject to the applicable requirements of 40 CFR Part 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR Part 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD.	ADEM Admin. Code r. 335-3-1106(81); 40 CFR Part 63, Subpart DDDD
	(c) This process is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP, PM_{10} and $PM_{2.5}$ established at ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))."	ADEM Admin. Code r. 335-3-1404
2.	Emission Standards	
	(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each unit in excess of the amount determined by the following applicable equation:	ADEM Admin. Code r. 335-3-404
	E= 17.31P ^{0.16} (P≥30 TPH) or	
	E= 3.59P ^{0.62} (P<30 TPH)	
	Where:	
	E = Emissions (in pounds per hour)	
	P = Process weight (in tons per hour)	
	(b) The permittee 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 shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-401
	(c) The permittee shall not cause or allow the VOC emissions from the kiln to exceed 4.0 lb/MBF, measured as WPP1 (WPP1= [(VOC as C) \times 1.13] + formaldehyde +[0.35 \times methanol]).	ADEM Admin. Code r. 335-3-1106(81)
	(d) The permittee shall not cause or allow the particulate matter emission rate (TSP) from the kiln to exceed 1.6 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1404
	(e) The permittee shall not cause or allow the particulate matter emission rate (PM_{10}) from the kiln exhaust to exceed 1.2 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1404

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		Federally Enforceable Provisos	Regulations
	(f)	The Permittee shall not cause or allow the particulate matter emission rate ($PM_{2.5}$) from the kiln exhaust to exceed 1.13 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-1404
	(g)	The permittee is limited to the use of untreated wood to fire this kiln. Approval must be received from the Air Division prior to burning any other type of fuel.	ADEM Admin. Code r. 335-3-1605(a)
3.	Co	mpliance and Performance Test Methods and Procedures	
	(a)	If testing is required, the particulate emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-105
	(b)	If testing is required, PM_{10} emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A.	ADEM Admin. Code r. 335-3-105
	(c)	If testing is required, $PM_{2.5}$ emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A and Method 202.	ADEM Admin. Code r. 335-3-105
	(d)	Opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105
	(e)	If testing is required, the volatile organic compound emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A. An alternative test method may be utilized provided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	(f)	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. 335-3-105
4.	<u>En</u>	nission Monitoring	
		The permittee shall use proper maintenance and operating practices for this unit as recommended by the manufacturer, which include and may not be limited to the following:	ADEM Admin. Code r. 335-3-1106(81)
		(1) Operate kilns within an average kiln temperature range of 220-260°F. The average kiln temperature shall be continuously monitored by a dry bulb/ wet bulb temperature sensor.	

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(2) Utilize proper kiln feed rates, which would be between 3-9 feet/hour depending upon the dimensions and moisture content of lumber being dried and other variables such as air flow, weather, time of year and target moisture content.	
(3) Lumber moisture content shall be maintained at greater than 6% to prevent overdrying of lumber	
(4) Conduct daily routine maintenance to include visual inspection, cleaning debris from kiln and pusher tracks, grease kiln cart's wheels, check pusher system for proper operation, calibrate moisture content equipment and temperature probes, inspect fuel feed and lubricate bearing as needed, maintain control room cleanliness and proper temperature;	
(5) Conduct weekly routine maintenance to include inspect kiln for damage and repair as needed, check and lubricate man escape door latches, grease fan shaft bearings, clean tracks through kiln, inspect fans, check hydraulic oil levels, check motor mount bolts, check conduit flex;	
(6) Conduct monthly routine maintenance to include checking for leaks in the kiln pipework, check controller cabinet for dust and debris, check gaskets and refractory for damage, check welded joint, check grates for damage or blocked holes;	
(7) Conduct quarterly routine maintenance to include checking pusher system for proper operation, clean tracks through kiln and inspect fans, bearings, and shafts, replacing as necessary, and testing of fire suppression systems;	
(8) Conduct semiannual routine maintenance to include checking electrical connections and inspecting the kiln building and foundation for damage and repair.	
5. Record Keeping and Reporting Requirements	
(a) If this kiln should exceed an applicable limit at any time, the Permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.	ADEM Admin. Code r. 335-3-1404
(b) The permittee shall maintain records documenting its compliance with proper operating and maintenance practices.	ADEM Admin. Code r. 335-3-11-0.6(81)
(c) The permittee shall maintain records of kiln production, including monthly production and 12-month rolling totals. Within 10 days of the end of each calendar month, records of the total through put for the last calendar month shall be recorded and the rolling 12-month total should be updated.	ADEM Admin. Code r. 335-3-14.04
(d) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.	ADEM Admin. Code r. 335-3-1605(c)

Federally Enforceable Provisos	Regulations
(e) The permittee shall submit a Semiannual Monitoring Report for this kiln to the Air Division, no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). This report shall include a certificate that all proper operating and maintenance practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.	ADEM Admin. Code r. 335-3-1605(c)

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Emission Unit No. 008 (Planer Mill with Pneumatic Conveyance System) Summary Page

Description: Planer Mill with Pneumatic Conveyance System to Quad Pack Cyclones and High Efficiency Cyclones series

Permitted Operating Schedule:
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8,760 \text{ Hours}}{\text{Year}}$$

Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
		TSP	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
			0.78 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
008A	Quad Pack Cyclone	PM ₁₀	0.78 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
		PM _{2.5}	0.78 lb/hr ADEM Admin. Code r. 335-3-1404 (SMS)	r. 335-3-1404
		VOC	N/A	N/A
		N/A	N/A	
		TSP	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
			E=17.31P ^{0.16} 0.32 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
008B	High Efficiency Cyclone	PM ₁₀	0.32 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
		PM _{2.5}	0.32 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)
		VOC	N/A	N/A
		HAP	N/A	N/A

Emission Unit No. 008 (Planer Mill Pneumatic Conveyance System) Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	<u>Ap</u>	plicability	
	(a)	This process is subject to the applicable requirements of ADEM Admin. Code r. 335316.03, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(b)	This process is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP, PM10 and PM2.5 established at ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))."	ADEM Admin. Code r. 335-3-1404
2.	Em	nission Standards	
	(a)	The permittee shall not cause or allow the emission of particulate matter in any one hour from each unit in excess of the amount determined by the following applicable equation:	ADEM Admin. Code r. 335-3-404(1)
		E= 17.31P ^{0.16} (P≥30 TPH) or	
		E= 3.59P ^{0.62} (P<30 TPH)	
		Where:	
		E = Emissions (in pounds per hour)	
		P = Process weight (in tons per hour)	
	(b)	The permittee shall not cause or allow the discharge of more than one 6-minute average opacity greater than 20% in any 60-minute period from this process. At no time shall the permittee cause or allow the discharge of a 6-minute average opacity of particulate emissions greater than 40%.	ADEM Admin. Code r. 335-3-401
	(c)	The permittee shall not cause or allow the particulate matter emission rate (TSP) from the Quad Pack Cyclone exhaust to exceed $0.78\ \mathrm{lb/hr}$	ADEM Admin. Code r. 335-3-1404
	(d)	The permittee shall not cause or allow the particulate matter emission rate (PM $_{\rm 10}$) from the Quad Pack Cyclone exhaust to exceed 0.78 lb/hr	ADEM Admin. Code r. 335-3-1404
	(e)	The permittee shall not cause or allow the particulate matter emission rate (PM $_{2.5}$) from the Quad Pack Cyclone exhaust to exceed 0.78 lb/hr	ADEM Admin. Code r. 335-3-1404
	(f)	The permittee shall not cause or allow the particulate matter emission rate (TSP) from the High Efficiency Cyclone exhaust to exceed $0.32\ lb/hr$	ADEM Admin. Code r. 335-3-1404

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		Fodovolis Enforceblo Duessines	Domintions
		Federally Enforceable Provisos	Regulations
	(g)	The permittee shall not cause or allow the particulate matter emission rate (PM $_{10}\!$) from the High Efficiency Cyclone exhaust to exceed 0.32 lb/hr	ADEM Admin. Code r. 335-3-1404
	(h)	The permittee shall not cause or allow the particulate matter emission rate (PM $_{2.5}$) from the High Efficiency Cyclone exhaust to exceed 0.32 lb/hr	ADEM Admin. Code r. 335-3-1404
3.	Co	mpliance and Performance Test Methods and Procedures	
	(a)	If testing is required, Total particulate emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5. An alternative test method may be utilized provided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	(b)	If testing is required, PM10 emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A. An alternative test method may be utilized provided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	(c)	If testing is required, PM2.5 emissions from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 201A. An alternative test method may be utilized provided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	(d)	Opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105
	(e)	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. 335-3-105
4.	En	nission Monitoring	
	(a)	While the process is operating, someone familiar with the process shall observe the visible emissions from all cyclones associated with this process a minimum of once daily during daylight hours for greater than normal visible emissions as determined by previous observations.	ADEM Admin. Code r. 335-3-1605
	(b)	Whenever observed emissions are greater than normal, the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation followed by an additional observation to confirm that visible emissions have been reduced to normal.	ADEM Admin. Code r. 335-3-1605

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		Federally Enforceable Provisos	Regulations
		The cyclones shall be physically inspected to ensure that the device has been properly maintained and operates as designed at least annually, but more frequently whenever observed visible emissions are greater than normal. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated within 24 hours of completing the inspection.	ADEM Admin. Code r. 335-3-1605
5.	Rec	cordkeeping and Reporting Requirements	
		The permittee shall maintain records, including dates, times, and results of all visual observations; corrective actions taken; and cyclone inspections, cleanings, and emissions-related maintenance in a permanent form suitable for inspection for a period of at least five (5) years from the date of generation of each record. The records shall be made available for inspection upon request.	ADEM Admin. Code r. 335-3-1605
		The permittee shall submit a Semiannual Monitoring Report for the Planer Mill Operations to the Air Division, 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:	ADEM Admin. Code r. 335-3-1605(c)
		(1) Certify whether the emission monitoring requirements were accomplished as required, and if not, describe the date and reason any required monitoring was not accomplished;	
		(2) Provide the date, time, and duration of any instance that greater than normal emissions were observed from the planer mill or planer shavings storage bin, or any instance of the presence of any visible emissions from the baghouse exhaust;	
		(3) Provide the nature and date of any corrective actions taken or preventative measures adopted following an observation of greater than normal emissions, or the presence of visible emissions from the baghouse exhaust; and	
		(4) Provide the dates of any physical inspections and/or cleanings of the cyclone performed during the reporting period.	

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Emission Unit Nos. 009 and 010 (Continuos Dry Kilns No. 5 and No. 6) Summary Page

Description: Two 100 MMBF/yr Continuous Direct-Fired Lumber Dry Kiln (CDK) with

Sawdust-fired 40 MMBtu/hr Burners

Operating Capacity: 11.4 MBF/hr

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

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation	
		TOP.	TSP	E=17.31P ^{0.16} or E=3.59P ^{0.62}	ADEM Admin. Code r. 335-3-404 (SIP)
		191	1.6 lb/hr	ADEM Admin. Code r. 335-3-1404 (SMS)	
CDK-5 (EU009)	Continuous Dry Kiln No. 5	VOC	4.0 lb/MBF as WPP1	ADEM Admin. Code r. 335-3-1404 (BACT)	
		SO_2	4.0 lb/MMBtu heat input ADEM Admin. Code input 335-3-404 (SIP)	ADEM Admin. Code r. 335-3-404 (SIP)	
	HAP N	N/A	40 CFR Part 63 Subpart DDDD		
	E=17.31P ^{0.16} or E=3.59P ^{0.62}	ADEM Admin. Code r. 335-3-404 (SIP)			
		131	1.6 lb/hr ADEM Admin. Code r. 335-3-1404 (SMS)		
CDK-6 (EU010)	Continuous Dry Kiln No. 6	VOC	4.0 lb/MBF as WPP1	ADEM Admin. Code r. 335-3-1404 (BACT)	
		SO_2	4.0 lb/MMBtu heat input	ADEM Admin. Code r. 335-3-404 (SIP)	
		НАР	N/A	40 CFR Part 63 Subpart DDDD	

Emission Unit 009 and 010 (Continuous Dry Kilns No. 5 and No. 6) Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	Applica	bility	
	(a)	This source is subject to the applicable requirements of Rule 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code r. 335-3-1603
	(b)	These units are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR Part 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD.	ADEM Admin. Code r. 335-3-1106(81); 40 CFR Part 63, Subpart DDDD
	(c)	This process is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP established at ADEM Admin. Code r. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD)).	ADEM Admin. Code r. 335-3-1404
2.	Emissi	on Standards	
	(a)	The permittee shall not cause or allow the emission of particulate matter (as TSP) in any one hour from any process more than the amount determined by the following equations:	ADEM Admin. Code r. 335-3-404(1)
		E= $17.31P^{0.16}$ (P ≥ 30 TPH) or	
		E= 3.59P ^{0.62} (P<30 TPH)	
		Where:	
		E = Emissions (in pounds per hour)	
		P = Process weight (in tons per hour)	
	(b)	The permittee shall not cause or allow visible emissions with a six-minute average opacity greater than 20% to be emitted more than once during any 60-minute period. The permittee shall not cause or allow visible emissions with a six-minute average opacity of greater than 40% to be emitted at any time. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-401
	(c)	The permittee shall not cause or allow emissions of TSP from this process to exceed 1.6 lb/hr.	ADEM Admin. Code r. 335-3-1404
	(d)	The permittee shall not cause or allow the VOC emissions from each kiln to exceed 4.0 lb/MBF, measured as WPP1.	ADEM Admin. Code r. 335-3-1404
	(e)	The Permittee shall not cause or allow the dried lumber production through either CDK to exceed 100,000 MBF during any consecutive 12-month period.	ADEM Admin. Code r. 335-3-1404

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		Federally Enforceable Provisos	Regulations
3.	Compliar	nce and Performance Test Methods and Procedures	
	n	E testing is required, the particulate emission rate shall be neasured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code r. 335-3-105
	ra	testing is required, the volatile organic compound emission ate shall be measured in accordance with 40 CFR Part 60, ppendix A, Method 25A.	ADEM Admin. Code r. 335-3-105
	co s co n re	ny compliance or performance tests required shall be onducted and data reduced in accordance with the test nethods and procedures contained in each specific permit ondition unless the Director (1) specifies or approves, in pecific cases, the use of a reference method with minor hanges in methodology, (2) approves the use of an equivalent nethod, or (3) approves the use of an alternative method, the esults of which he has determined to be adequate for adicating whether a specific source is in compliance.	ADEM Admin. Code r. 335-3-105
4.	Emission	Monitoring	
	p n	The permittee shall use proper maintenance and operating ractices for these units as recommended by the nanufacturer, which include but may not be limited to the following:	ADEM Admin. Code r. 335-3-1404
	(1	Operate kilns within an average kiln temperature range of 220-260°F. The average kiln temperature shall be continuously monitored by a dry bulb/wet bulb temperature sensor.	
	(2	2) Utilize proper kiln feed rates, which would be estimated at 3-9 feet/hr. depending upon the dimension and moisture content of lumber being dried and other variables such as air flow, weather, time of year and target moisture.	
	(3	3) Lumber moisture content shall be maintained at greater than 6% to prevent overdrying of lumber.	
	(4	1) Conduct daily routine maintenance to include checking lumber entrance/exit baffle, ensure kiln controls to confirm alarms are operational, and inspect wet-bulb wicks, replace as necessary;	
	(5	5) Conduct weekly routine maintenance to include draining water from transducers and air supplies;	
	(€	6) Conduct quarterly routine maintenance to include checking pusher system for proper operation, clean tracks through kiln and inspect fans, bearings, and shafts, replace as necessary;	

	Federally Enforceable Provisos	Regulations
	(7) Conduct semiannual routine maintenance to include checking electrical connections and inspect building and foundation for damage;	
	(8) Conduct annual routine maintenance to include inspect controller cabinet for dust and small debris, check calibration of all transducers, valves, and vent controls, check fan bearing taper locks for looseness or extensive wear, inspect all steam traps, and repair or replace as needed.	
5. Record	keeping and Reporting Requirements	
(a)	If the kilns should exceed an applicable limit at any time, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.	ADEM Admin. Code r. 335-3-1404
(b)	The permittee shall maintain records documenting its compliance with the proper operating and maintenance practices.	ADEM Admin. Code r. 335-3-1404
(c)	The permittee shall maintain records of kiln production, including monthly production and 12-month rolling totals. Within ten (10) days of the end of each calendar month, records of the total throughput for the last calendar month shall be recorded and the rolling 12-month total updated.	
(d)	The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.	ADEM Admin. Code r. 335-3-1605(c)
(e)	The permittee shall submit a Semiannual Monitoring Report, as required by General Proviso No. 21 (a) of Scotch Gulf Lumber, Fulton's Title Major Source Operating Permit (January 1st-June 30th and July 1st-December 31st). The report for these CDKs shall include a certification that all preventive maintenance activities were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.	ADEM Admin. Code r. 335-3-1605(c)

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Emission Unit Nos. 011 and 012: 2 Green Sawdust Fuel Silos No. 2 and No. 3 with Target Boxes

Summary Page

Description: Green Fuel Sawdust Silo No. 2 and No. 3 each equipped with a Pneumatic

Conveyance System to a Target Box

Operating Schedule: 24 hours/day, 7 days/week, 52 weeks/year

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
EUO11	Green Fuel Silo No. Two with Target Box	TSP	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
EU011			1.6 lb/hr	ADEM Admin. Code r. 335-3-404 (SIP)
DVO10	Green Fuel Silo No. Three with Target Box	TOP.	E=3.59P ^{0.62} or E=17.31P ^{0.16}	ADEM Admin. Code r. 335-3-404 (SIP)
EU012		TSP	1.6 lb/hr	ADEM Admin. Code r. 335-3-404 (SIP)

Emission Unit Nos. 011 and 012 (Green Sawdust Fuel Silo No. 2 and No. 3 each with a Target Box)

Unit Specific Provisos

Fe	ederally Enforceable Provisos	Regulations
1. Applicability		
	te is subject to the applicable requirements of Rule 03, "Major Source Operating Permits".	ADEM Admin. Code r. 335-3-1603
restrict its for TSP est Permits	ess is subject to synthetic minor source limits to potential to emit below the significant emission rates ablished at ADEM Admin. Code r. 335-3-1404, "Air Authorizing Construction in Clean Air Areas n of Significant Deterioration (PSD)).	ADEM Admin. Code r. 335-3-1404
2. Emission Standar	<u>ds</u>	
particulate	ittee shall not cause or allow the emission of e matter (as TSP) in any one hour from any process the amount determined by the following equations:	ADEM Admin. Code r. 335-3-404(1)
	E= 17.31P ^{0.16} (P≥30 TPH) or	
	E= 3.59P ^{0.62} (P<30 TPH)	
	Where:	
E =	Emissions (in pounds per hour)	
P =	Process weight (in tons per hour)	
six-minute more than shall not o average op	ttee shall not cause or allow visible emissions with a average opacity greater than 20% to be emitted once during any 60-minute period. The permittee cause or allow visible emissions with a six-minute acity of greater than 40% to be emitted at any time. ill be determined by 40 CFR Part 60, Appendix A,	ADEM Admin. Code r. 335-3-401
	ttee shall not cause or allow emissions of TSP from as to exceed 1.6 lb/hr.	ADEM Admin. Code r. 335-3-1404
3. Compliance and P	Performance Test Methods and Procedures	
unit shall Appendix	s required, the total particulate emissions from this be determined in accordance with 40 CFR Part 60, A, Method 5. An alternative test method may be ovided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
rate shall Appendix	s required, the volatile organic compound emission be measured in accordance with 40 CFR part 60, A, Method 25A. An alternative test method may be ovided prior approval is granted by the Air Division.	ADEM Admin. Code r. 335-3-105
	stack emissions shall be determined in accordance FR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-105

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		Federally Enforceable Provisos	Regulations
4.	Emissi	on Monitoring	
	(a)	While the process is operating, someone familiar with the process shall observe the visible emissions from each target box, fuel silo vents and exhaust at least weekly during daylight hours for any visible emissions.	ADEM Admin. Code r. 335-3-1605(c)
	(b)	Whenever visible emissions are observed from the fuel silos, corrective action shall be initiated as soon as practical 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.	ADEM Admin. Code r. 335-3-1605(c)
	(c)	The target boxes and associated pneumatic conveyance lines shall be physically inspected to ensure the device has been properly maintained and operates as designed at least annually, but more frequently whenever visible emissions are observed from the target box, fuel silo's vents and exhaust. If the results of the inspection indicate that cleaning and/or maintenance is needed, such action should be initiated, as soon as practical but no longer than 24 hours from the completion of inspection.	ADEM Admin. Code r. 335-3-1605(c)
5.	Record	keeping and Reporting Requirements	
	(a)	The permittee shall maintain the following records for this process in a permanent form and readily available for inspection for at least five (5) years from the date of generation of each record:	ADEM Admin. Code r. 335-3-1605(c)
		(1) The date, time, and results of each visible emissions observation;	
		(2) The date(s), time, duration, and cause of any excursion from a monitoring parameter;	
		(3) The date(s), time, nature, and results of emission-related corrective action(s) taken (including cleaning).	
	(b)	The permittee shall submit a Semiannual Monitoring Report to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1st- June 1st and July 1st – December 31st). This report shall include:	ADEM Admin. Code r. 335- 3-16 .05(c)
	l	(1) A statement as to whether all emission observations were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;	
	1	(2) The date(s), time, nature, and results of any corrective action taken when (1) any visible emissions were observed from target boxes or the fuel silo vents, or (2) an inspection indicated that cleaning or emissions-related maintenance was needed; and	

Federally Enforceable Provisos	Regulations
(3) A statement as to whether the annual inspection of the target boxes and associated pneumatic lines were accomplished during the reporting period, and if so, the date and results of the inspection.	

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Emission Unit 013 (Emergency Diesel Fire Pump Engine) Summary Page

600 bhp (448 kW_{mj} Clarke Compression Ignition Diesel-fired Reciprocating Internal Combustion Engine (Emergency Engine No. One) (NSPS) **Description:**

Operating Schedule: 24 hrs/day, 7 days/week, 52 weeks/yr, 8,760 hours per year

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
		NOx +	4.0 g/kW-hr	
		NMHC	(3.0 g/HP-hr)	40 CFR 60, Subpart IIII
	600 bhp (Emergency Engine No. One) CO (2.6 g/HP-hr) 0.20 g/kw-hr (0.15 g/HP-hr) HAP N/A	СО	3.5 g/KW-hr	40.000.00.1
			(2.6 g/HP-hr)	40 CFR 60, Subpart IIII
EU 013		O+2 a)	0.20 g/kw-hr	40.000.00.1
		PM	(0.15 g/HP-hr)	40 CFR 60, Subpart IIII
		НАР	N/A	40 CFR 63.6580 [Adopted by reference at ADEM Admin. Code r. 335-3-1106(103)]

Emission Unit 013 (Emergency Diesel Fire Pump Engine) Unit Specific Provisos

		Federally Enforceable Provisos	Regulations
1.	<u>Applica</u>		
	(a)	This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
	(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. 335-3-1106; 40 CFR § 63, Subpart A; 40 CFR 63, Subpart ZZZZ
	(c)	This unit is subject to the applicable requirements of the 40 CFR, Subpart IIII the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.	ADEM Admin. Code r. 335-3-1003; 40 CFR §60, Subpart A; 40 CFR §60, Subpart III
2.	Emissi	on Standards	
	(a)	The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.	40 CFR §63, Subpart ZZZZ
	(b)	The permittee shall not operate these units except as follows:	40 CFR §63.6640(f)(1) through (4)
		(1) Emergency Situations;	
		(2) Maintenance checks and readiness testing, not to exceed 100 hours per year; and	
		(3) Non-emergency situations, not to exceed 50 hours per year allowed for maintenance checks and readiness testing. The 50 hours per year cannot be used for peak shavings or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	
		(4) 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 been abated.	
	(c)	The permittee shall not cause or allow the emissions from these units to exceed the applicable emission standards in 40 CFR §89.112, specifically:	40 CFR §60.4205(b); 40 CFR §60.4202(d)
		(1) The sum of the emissions of non-methane hydrocarbons (NMHC) and Nitrogen Oxides (NOX) shall not exceed 4.0 g/kW-hr;	

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	Federally Enforceable Provisos	Regulations
	(2) Carbon Monoxide (CO) emissions should not exceed 3.5 g/kW-hr;	
	(3) Particulate matter (PM) emissions shall not exceed 0.20 g/kW-hr;	
(d)	The permittee should operate and maintain this unit according to the manufacturer's instructions.	40 CFR §60.4206; 40 CFR §60.4211(a)
(e)	The permittee shall not burn any diesel in this unit that does not meet the following per-gallon standards of 40 CFR $\S 80.51(b)$	40 CFR §60.4207(b)
	(1) Sulfur content shall not exceed 15 parts per million (ppm).	
	(2) Cetane index shall be a minimum of 40 or the aromatic content shall not exceed 35 percent volume.	
3. <u>Compli</u>	ance and Performance Test Methods and Procedures	
	re are no performance test methods or procedures associated this unit.	
4. Emissic	on Monitoring	
(a)	The permittee shall operate and maintain this unit according to the manufacturer's emission-related written instructions or 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.	40 CFR §63.6640(a)
(b)	No later than the applicable compliance date for each engine, the permittee shall install a non-resettable hour meter if one is not already installed.	40 CFR §60.4209 (a)
5. Record	keeping and Reporting Requirements	
(a)	To demonstrate compliance with the operational limitations, the permittee shall keep records of the operation and maintenance of these units in accordance with 40 CFR §63.6655. At a minimum, these records should include:	ADEM Admin. Code r. 335-3-1605(c); 40 CFR §63.6655
	(1) The total number of hours the engine operated during a calendar year subtotaled by the reason the engine was in operation;	
	(2) The dates of each oil and filter change with the corresponding hour on the hour meter; and	
	(3) The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and	
	(4) The dates and nature of other emission-related repairs and maintenance performed.	

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	Federally Enforceable Provisos	Regulations
(b)	The permittee shall maintain on-site for the life of this unit either a copy often manufacturer's emission-related operation and maintenance instructions for this unit.	ADEM Admin. Code r. 335-3-1605(c)
(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 3 years of data must be retained on-site.	ADEM Admin. Code r. 335-3-1605(c); 40 CFR §63.6660
(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 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 fulfilled.	ADEM Admin. Code r. 335-3-1605(c)
(e)	The permittee shall demonstrate compliance with fuel limitations by maintaining records of sulfur contents and cetane index or aromatic content of fuel.	ADEM Admin. Code r. 335-3-1605(c)

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Provisos for Facility-Wide Fugitive Dust Plan

	Federally Enforceable Provisos	Regulations
1.	<u>Applicability</u>	
	This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-1603, "Major Source Operating Permits."	ADEM Admin. Code r. 335-3-1603
2.	Emission Standards	
	The permittee shall take reasonable precautions as directed in General Proviso No. 18 to prevent fugitive dust at the facility which travels beyond the facility property line and cause a nuisance.	ADEM Admin. Code r. 335-3-402
3.	Compliance and Performance Test Methods and Procedures	
	The permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.	ADEM Admin. Code r. 335-3-1607
4.	Emission Monitoring	
	The permittee shall conduct weekly, considering factors such as naturally wet conditions, visual observations for fugitive dust in areas listed with potential to generate fugitive dust, and if visible emissions traveling beyond the facility property line are observed, any necessary corrective actions shall be initiated within four (4) hours of observation.	ADEM Admin. Code r. 335-3-1605
5.	Recordkeeping and Reporting Requirements	
	The permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of Proviso 4(a). 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.	ADEM Admin Code r. 335-3-1605

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Appendix A

Fugitive Dust Management Plan

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Facility Wide Fugitive Dust Emission Plan Scotch Gulf Lumber, LLC - Fulton



Purpose:

The purpose of this Fugitive Dust Emission Plan is to prevent and/or reduce emanating fugitive dust from the Fulton, Alabama facility during periods of operation.

2) Scope:

A Fugitive Dust Plan is created for the purpose of protecting the health of the residents in Fulton, Alabama. This fugitive dust plan is designed to prevent and/or reduce fugitive dust from emanating from plant roads, grounds, stockpiles, etc. during operating hours.

3) Responsibilities:

The Permittee will maintain the facility or haul roads and grounds while in operation in the following manner so that dust will not become airborne.

- By the application of water at 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;
- By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- By paving;
- By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.

4) Episode Criteria:

A minimum of one, or a combination, of the listed responsibilities above shall be utilized to minimize airborne dust from the facility or haul roads and grounds.

5) Corrective Action:

Should one, or a combination, of the above methods of responsibilities fail to adequately reduce airborne dust from the facility or haul roads and grounds, alternative methods shall be employed by the permittee, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. All alternative methods employed by the permittee will be sent to the Alabama department of Environmental Management for approval prior to utilization.

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