

# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** T.R. MILLER MILL COMPANY, INC.  
**FACILITY NAME:** T.R. MILLER MILL COMPANY, INC.  
**FACILITY/PERMIT NO.:** 502-S002  
**LOCATION:** BREWTON, ESCAMBIA 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:**

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

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<p><b>5. <u>Termination for Cause</u></b></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-.05(h)</p>
<p><b>6. <u>Property Rights</u></b></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(i)</p>
<p><b>7. <u>Submission of Information</u></b></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>ADEM Admin. Code r. 335-3-16-.05(j)</p>
<p><b>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></b></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>ADEM Admin. Code r. 335-3-16-.05(k)</p>
<p><b>9. <u>Certification of Truth, Accuracy, and Completeness</u></b></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>ADEM Admin. Code r. 335-3-16-.07(a)</p>
<p><b>10. <u>Inspection and Entry</u></b></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>ADEM Admin. Code r. 335-3-16-.07(b)</p>

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<p>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</p> <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><b>11. Compliance Provisions</b></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><b>12. Compliance Certification</b></p> <p>The permittee shall submit a complete and accurate compliance certification by <b>February 19<sup>th</sup></b> of each year for each annual reporting period of this permit (December 21<sup>st</sup> through December 20<sup>th</sup>).</p> <p>(a) The compliance certification shall include the following:</p> <ol style="list-style-type: none"> <li>(1) The identification of each term or condition of this permit that is the basis of the certification;</li> <li>(2) The compliance status;</li> <li>(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);</li> <li>(4) Whether compliance has been continuous or intermittent;</li> <li>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</li> </ol> <p>(b) The compliance certification shall be submitted to:</p>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</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 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><b>13. Reopening for Cause</b></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <p>(a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.</p> <p>(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.</p> <p>(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><b>14. Additional Rules and Regulations</b></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>ADEM Admin. Code r. 335-3-16-.13(5)</p> <p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
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<p><b><u>15. Equipment Maintenance or Breakdown</u></b></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"> <li>(1) Identification of the specific facility to be taken out of service as well as its location and permit number;</li> <li>(2) The expected length of time that the air pollution control equipment will be out of service;</li> <li>(3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period;</li> <li>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</li> <li>(5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period.</li> </ol> <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><b><u>16. Operation of Capture and Control Devices</u></b></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>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p> <p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>

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<p><b>17. <u>Obnoxious Odors</u></b></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>ADEM Admin. Code r. 335-3-1-.08</p>
<p><b>18. <u>Fugitive Dust</u></b></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. 335-3-4-.02</p>
<p><b>19. <u>Additions and Revisions</u></b></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>

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<b>20. <u>Recordkeeping Requirements</u></b>	
<p>(a) Records of required monitoring information of the source shall include the following:</p> <ul style="list-style-type: none"> <li>(1) The date, place, and time of all sampling or measurements;</li> <li>(2) The date analyses were performed;</li> <li>(3) The company or entity that performed the analyses;</li> <li>(4) The analytical techniques or methods used;</li> <li>(5) The results of all analyses; and</li> <li>(6) The operating conditions that existed at the time of sampling or measurement.</li> </ul> <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>	ADEM Admin. Code r. 335-3-16-.05(c)2.
<b>21. <u>Reporting Requirements</u></b>	
<p>(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).</p> <p>(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.
<b>22. <u>Emission Testing Requirements</u></b>	
Each point of emission which requires testing shall be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)

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<p>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.</p> <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"> <li>(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.</li> <li>(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).</li> <li>(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.</li> <li>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</li> </ul> <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><b>23. <u>Payment of Emission Fees</u></b></p> <ul style="list-style-type: none"> <li>(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.</li> <li>(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.</li> </ul> <p><b>24. <u>Other Reporting and Testing Requirements</u></b></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-1-7-.04</p> <p>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-3-1-.04(1)</p>

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<p><b><u>25. Title VI Requirements (Refrigerants)</u></b></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><b><u>26. Chemical Accidental Prevention Provisions</u></b></p> <p>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:</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 §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><b><u>27. Display of Permit</u></b></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>
<p><b><u>28. Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>ADEM Admin. Code r. 335-3-1-.10</p>

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<p><b><u>29. Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>ADEM Admin. Code r. 335-3-4-.01(1)</p>
<p><b><u>30. Fuel-Burning Equipment</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-5-.01.</p>	<p>ADEM Admin. Code r. 335-3-4-.03</p> <p>ADEM Admin. Code r. 335-3-5-.01</p>
<p><b><u>31. Process Industries – General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p>	<p>ADEM Admin. Code r. 335-3-4-.04</p>
<p><b><u>32. Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>
<p><b><u>33. Open Burning</u></b></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. 335-3-3-.01</p>

**Emission Unit No. 002 (Sawmill Boiler No. SB-1)****Summary Page**

**Description:** 68 MMBtu/hr Babcock & Wilcox wood-fired boiler with multiclone

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
SB-1	Boiler exhaust	TSP	0.20 gr/dscf @ 50% excess air	ADEM Admin. Code r. 335-3-4-.08 (SIP)
			0.44 lb/MMBtu	40 CFR Part 63 Subpart DDDDD
		SO <sub>2</sub>	4.0 lb/MMBtu	ADEM Admin. Code r. 335-3-5-.01 (SIP)
		CO	3500 ppm @ 3% O <sub>2</sub>	40 CFR Part 63 Subpart DDDDD
		Hg	5.7x10 <sup>-6</sup> lb/MMBtu (Until October 6, 2025)	40 CFR Part 63 Subpart DDDDD
			5.4x10 <sup>-6</sup> lb/MMBtu (After October 6, 2025)	
		HCL	0.022 lb/MMBtu (Until October 6, 2025)	40 CFR Part 63 Subpart DDDDD
			0.020 lb/MMBtu (After October 6, 2025)	
		NO <sub>x</sub>	N/A	N/A
		VOC	N/A	N/A

**Emission Unit No. 002 (Sawmill Boiler No. SB-1)****Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<b>1. <u>Applicability</u></b>	
(a) This boiler 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 boiler is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(107)], and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A, as provided in 40 CFR §63.7565 and Table 10 of Subpart DDDDD.	ADEM Admin. Code r. 335-3-11-.06 (107); 40 CFR 63 Subpart DDDDD
<b>2. <u>Emission Standards</u></b>	
(a) The permittee shall not cause or allow emissions of TSP from this 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 emissions of sulfur dioxide from this boiler to exceed 4.0 lb/MMBtu of heat input.	ADEM Admin. Code r. 335-3-5-.01(b)
(c) 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 boiler. 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. 335-3-4-.01
(d) The permittee shall only use untreated wood to fire this boiler. Approval must be received from the Air Division prior to burning any other type of fuel.	ADEM Admin. Code r. 335-3-16-.05(a)
(e) The permittee shall not cause or allow the point source emissions from the boilers to exceed any of the following limitations, except as provided under 40 CFR §63.7522 and during startup and shutdown, as required by 40 CFR §63.7500, and 40 CFR 63 Subpart DDDDD, Table 2.	40 CFR 63 Subpart DDDDD
(i) Hydrogen Chloride (HCl): 0.22 lb per MMBtu of heat input (until October 6, 2025) and 0.20 lb per MMBtu of heat input (after October 6, 2025);	
(ii) Mercury (Hg): 5.7E <sup>-06</sup> lb per MMBtu of heat input (until October 6, 2025) and 5.4E <sup>-06</sup> lb per MMBtu of heat input (after October 6, 2025);	
(iii) Carbon Monoxide (CO) [or CEMS] – 3,500 ppm by volume on a dry basis corrected to 3 percent oxygen, averaged over three (3) one-hour minimum sampling time runs; and	



Federally Enforceable Provisos	Regulations
(iv) Filterable Particulate Matter (PM): 0.44 lb per MMBtu of heat input.	
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>	
(a) If testing is required, the particulate matter (as TSP) emission rate shall be measured 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 sulfur dioxide emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 6.	ADEM Admin. Code r. 335-3-1-.05
(c) Opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-1-.05
(d) 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.	ADEM Admin. Code r. 335-3-1-.05
(e) The permittee shall maintain a minimum of two (2) personnel trained to determine visible emissions in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code r. 335-3-1-.05
(f) If testing is required, the carbon monoxide emission rate from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 10.	40 CFR 63 Subpart DDDDD Table 5
(g) If testing is required, the Hydrogen Chloride (HCl) emission rate from this process shall be determined in accordance with Method 26 or 26A at 40 CFR Part 60, Appendix A.	40 CFR 63 Subpart DDDDD Table 5
(h) If testing is required, the Mercury (Hg) emission rate from this process shall be determined in accordance with Method 29, 30A or 30B at 40 CFR Part 60, Appendix A.	40 CFR 63 Subpart DDDDD Table 5
(i) The permittee must conduct all applicable performance tests according to 40 CFR §63.7520 on an annual basis except as specified below:	40 CFR §63.7515
(i) Annual performance tests must be completed no more than 13 months after the previous performance test	
(ii) If performance tests for a given pollutant for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit for the pollutant and there are no changes to the operation or air pollution control equipment that could increase emissions,	40 CFR §63.7515(b) and (c)
(1) The permittee may choose to conduct performance tests for the pollutant every third year.	
(2) Each such performance test must be conducted no more than 37 months after the previous performance test	

Federally Enforceable Provisos	Regulations
<p>(3) 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>(j) The permittee shall conduct a tune-up of the boiler every 5 years to demonstrate continuous compliance. as specified, but not limited to:</p> <ul style="list-style-type: none"> <li>(i) Inspect the burner, and clean or replace any components of the burner as necessary</li> <li>(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available</li> <li>(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly</li> <li>(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject</li> <li>(v) Measure the concentrations in the effluent stream of CO 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). Measurements may be taken using a portable CO analyzer; and</li> <li>(vi) Maintain on-site and submit, if requested by the Administrator, a report containing the information in 40 CFR §63.7540 (10)(vi)(a) through (c).</li> </ul> <p>(k) Each tune-up, specified in §63.7540(a)(12), must be conducted no more than 72 months after the previous tune-up.</p> <p>(l) The permittee must operate the oxygen trim system for the boiler with the oxygen level set at or above the lowest hourly average oxygen concentration measured during the CO performance test.</p> <p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) While the boiler is operating, the permittee shall determine the opacity of the boiler's exhaust in accordance with Method 9 at least once per day.</p>	<p>40 CFR §63.7540(a)(12)</p> <p>40 CFR §63.7540(a)(12)</p> <p>40 CFR §63.7525(a)(7)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(b) If the Method 9 test results of a daily reading indicate visible emissions of greater than 10% opacity, the boiler operator shall immediately undertake the necessary procedures to return the boiler to its normal operating condition. Once the boiler has been returned to its normal operating condition, an additional Method 9 test shall be conducted on the boiler/multiclone. If the additional Method 9 test indicates visible emissions of greater than 10% opacity, the above steps shall be repeated until a Method 9 test indicates that visible emissions are no greater than 10% opacity.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p>	
<p>(a) The permittee shall maintain the following records for this emission unit in a permanent form and readily available for inspection for at least five (5) years from the date of generation of each record:</p> <ul style="list-style-type: none"> <li>(i) The date, time, and results of each visual emission observation (Method 9) including the name/initials of the observer;</li> <li>(ii) The date(s), time, duration, and cause of any opacity exceeding the 10% corrective action level;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken;</li> <li>(iv) The certificates for the qualified visible emission observers; and</li> <li>(v) Process records and operator's log verifying the boiler's operating parameters.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the reporting period (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(i) A statement as to whether all visible 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;</li> <li>(ii) The date(s), time, duration, and cause of any opacity exceeding the 10% corrective action level;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>(c) A Semiannual Compliance Report (SCR), shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>) to include the information specified in Table 9 of 40 CFR 63, Subpart DDDDD, and 40 CFR §63.7550(c).</p>	<p>40 CFR §63.7550</p>

Federally Enforceable Provisos	Regulations
<p>(d) As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). Records can be kept off site for the remaining 3 years</p>	<p>40 CFR §63.7560(b)</p>

**Emission Unit No. 023 (Sawmill Boiler No. SB-2)****Summary Page****Description:** 35.62 MMBtu/hr Industrial wood-fired boiler with multiclone

**Permitted Operating Schedule:** 
$$\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

**Emission limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
SB-2	Boiler exhaust	TSP	0.20 gr/dscf @ 50% excess air	ADEM Admin. Code r. 335-3-4-.08 (SIP)
			0.22 lb/MMBtu and 334,075 MMBtu/yr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
			0.44 lb/MMBtu	40 CFR Part 63 Subpart DDDDD
		PM <sub>10</sub>	0.20 lb/MMBtu and 334,075 MMBtu/yr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
		SO <sub>2</sub>	4.0 lb/MMBtu heat input	ADEM Admin. Code r. 335-3-5-.01 (SIP)
		VOC	0.017 lb/MMBtu	ADEM Admin. Code r. 335-3-14-.04 (BACT)
		CO	3500 ppm @ 3% O <sub>2</sub>	40 CFR Part 63 Subpart DDDDD
		Hg	5.7x10 <sup>-6</sup> lb/MMBtu (Until October 6, 2025) 5.4x10 <sup>-6</sup> lb/MMBtu (After October 6, 2025)	40 CFR Part 63 Subpart DDDDD
		HCL	0.022 lb/MMBtu (Until October 6, 2025) 0.020 lb/MMBtu (After October 6, 2025)	40 CFR Part 63 Subpart DDDDD
		NO <sub>x</sub>	N/A	N/A

**Emission Unit No. 023 (Sawmill Boiler No. SB-2)****Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<b>1. <u>Applicability</u></b>	
(a) This boiler 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 boiler is subject to a Best Available Control Technology (BACT) limit for volatile organic compounds (VOC) established pursuant to the applicable requirements of 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
(c) This boiler is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP and PM <sub>10</sub> established at ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD))".	ADEM Admin. Code r. 335-3-14-.04
(d) This boiler is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters 40 CFR Part 63, Subpart DDDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(107)] and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.7565 and Table 10 of Subpart DDDDD. Pursuant to 40 CFR §63.7495(b) the facility must comply with this rule no later than January 31, 2016.	ADEM Admin. Code r. 335-3-11-.06 (107)  40 CFR 63 Subpart DDDDD
<b>2. <u>Emission Standards</u></b>	
(a) The permittee shall not cause or allow emissions of TSP from this 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 emissions of sulfur dioxide from this boiler to exceed 4.0 lb/MMBtu of heat input.	ADEM Admin. Code r. 335-3-5-.01(b)
(c) 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 boiler. 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. 335-3-4-.01
(d) The permittee shall not cause or allow emissions of TSP from this boiler to exceed 0.22 lb/MMBtu of heat input.	ADEM Admin. Code r. 335-3-14-.04
(e) The permittee shall not cause or allow emissions of PM <sub>10</sub> from this boiler to exceed 0.20 lb/MMBtu of heat input.	ADEM Admin. Code r. 335-3-14-.04

Federally Enforceable Provisos	Regulations
<p>(f) The permittee shall not cause or allow emissions of VOC from this boiler to exceed 0.017 lb/MMBtu of heat input.</p> <p>(g) The permittee shall not cause or allow the heat input to this boiler to exceed 334,075 MMBtu during any consecutive 12-month period.</p> <p>(h) The permittee shall only use untreated wood to fire this boiler. Approval must be received from the Air Division prior to burning any other type of fuel.</p> <p>(i) The permittee shall not cause or allow the point source emissions from this boiler to exceed any of the following limitations, except as provided under 40 CFR §63.7522 and during startup and shutdown as required by 40 CFR §63.7500(f).</p> <p style="padding-left: 40px;">(i) Hydrogen Chloride (HCl): 0.22 lb per MMBtu of heat input (until October 6, 2025) and 0.20 lb per MMBtu of heat input (after October 6, 2025);</p> <p style="padding-left: 40px;">(ii) Mercury (Hg): 5.7E<sup>-06</sup> lb per MMBtu of heat input (until October 6, 2025) and 5.4E<sup>-06</sup> lb per MMBtu of heat input (after October 6, 2025);</p> <p style="padding-left: 40px;">(iii) Carbon Monoxide (CO) [or CEMS]: 3,500 ppm by volume on a dry basis corrected to 3 percent oxygen, averaged over three (3) one-hour minimum sampling time runs, and;</p> <p style="padding-left: 40px;">(iv) Filterable Particulate Matter (PM): 0.44 lb per MMBtu of heat input.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p> <p>40 CFR Part 63, Subpart DDDDD</p>
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p>	
<p>(a) If testing is required, the particulate matter (as TSP) emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the PM<sub>10</sub> emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5 or 40 CFR Part 51, Appendix M, Method 201 or 201A, as appropriate.</p> <p>(c) If testing is required, the VOC emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 25A.</p> <p>(d) If testing is required, the sulfur dioxide emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 6.</p> <p>(e) Opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</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. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>(f) If testing is required, the carbon monoxide emission rate from this process shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 10.</p> <p>(g) If testing is required, the Hydrogen Chloride (HCl) emission rate from this process shall be determined in accordance with Method 26 or 26A at 40 CFR Part 60, Appendix A.</p> <p>(h) If testing is required, the Mercury (Hg) emission rate from this process shall be determined in accordance with Method 29, 30A or 30B at 40 CFR Part 60, Appendix A.</p> <p>(i) 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.</p> <p>(j) The permittee shall maintain a minimum of two (2) personnel trained to determine visible emissions in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(k) The permittee must conduct all applicable performance tests according to 40 CFR §63.7520 on an annual basis except as specified below:</p> <p>(i) Annual performance tests must be completed no more than 13 months after the previous performance test</p> <p>(ii) If performance tests for a given pollutant for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit for the pollutant and there are no changes to the operation or air pollution control equipment that could increase emissions</p> <p>(1) The permittee may choose to conduct performance tests for the pollutant every third year</p> <p>(2) Each such performance test must be conducted no more than 37 months after the previous performance test</p> <p>(3) 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>(l) The permittee shall conduct a tune-up of the boiler to demonstrate continuous compliance every 5 years, as specified, but not limited to:</p> <p>(i) Inspect the burner, and clean or replace any components of the burner as necessary</p>	<p>40 CFR 63 Subpart DDDDD Table 5</p> <p>40 CFR 63 Subpart DDDDD Table 5</p> <p>40 CFR 63 Subpart DDDDD Table 5</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>40 CFR §63.7515</p> <p>§63.7540(a)(12)</p>



Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available</li> <li>(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly</li> <li>(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject</li> <li>(v) Measure the concentrations in the effluent stream of CO 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). Measurements may be taken using a portable CO analyzer; and</li> <li>(vi) Maintain on-site and submit, if requested by the Administrator, a report containing the information in 40 CFR §63.7540 (10)(vi)(a) through (C).</li> <li>(m) Each tune-up, specified in §63.7540(a)(12), must be conducted no more than 72 months after the previous tune-up.</li> <li>(n) The permittee must operate the oxygen trim system for the boiler with the oxygen level set at or above the lowest hourly average oxygen concentration measured during the CO performance test.</li> </ul>	
<b>4. <u>Emission Monitoring</u></b>	
(a) While the boiler is operating, the permittee shall determine the opacity of the boiler's exhaust in accordance with Method 9 at least once per day.	ADEM Admin. Code r. 335-3-16-.05(c)
(b) If the Method 9 test results of a daily reading indicate visible emissions of greater than 10% opacity, the boiler operator shall immediately undertake the necessary procedures to return the boiler to its normal operating condition. Once the boiler has been returned to its normal operating condition, an additional Method 9 test shall be conducted on the boiler/multiclone. If the additional Method 9 test indicates visible emissions of greater than 10% opacity, the above steps shall be repeated until a Method 9 test indicates that visible emissions are no greater than 10% opacity.	ADEM Admin. Code r. 335-3-16-.05(c)
(c) The permittee shall conduct emission testing for particulate matter at least once every five (5) years with no greater than 60 months elapsing between tests unless an extension of time is granted by the Air Division in advance.	ADEM Admin. Code r. 335-3-16-.05(c)

Federally Enforceable Provisos	Regulations
<p>(d) The permittee shall utilize a properly calibrated, maintained, and operated device to continuously measure and record the steam flow from the boiler. The data collected shall be used to calculate the heat input to the boiler.</p> <p>(e) Within ten (10) days of the end of each calendar month, the permittee shall calculate the heat input to the boiler on for the previous month and previous 12-month period to determine compliance with the heat input limitation.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p>	
<p>(a) The permittee shall maintain the following records for this emission unit in a permanent form and readily available for inspection for at least five (5) years from the date of generation of each record:</p> <ul style="list-style-type: none"> <li>(i) The date, time, and results of each visual emission observation (Method 9) including the name/initials of the observer;</li> <li>(ii) The date(s), time, duration, and cause of any opacity exceeding the 10% corrective action level;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken;</li> <li>(iv) The certificates for the qualified visible emission observers;</li> <li>(v) Process records and operator's log verifying the boiler's operating parameters; and</li> <li>(vi) The heat input to the boiler on a monthly and 12-month rolling total basis and the data utilized to calculate these totals.</li> </ul> <p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(i) A statement as to whether all visible 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;</li> <li>(ii) The date(s), time, duration, and cause of any opacity exceeding the 10% corrective action level;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken; and</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(iv) The monthly and 12-month rolling totals of the heat input to the boiler.</p> <p>(c) A Semiannual Compliance Report (SCR), shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>) to include the information specified in Table 9 of 40 CFR 63, Subpart DDDDD, and 40 CFR §63.7550(c).</p> <p>(d) As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). Records can be kept off site for the remaining 3 years.</p>	<p>40 CFR §63.7550</p> <p>40 CFR §63.7560(b)</p>

**Emission Unit No. 003 (Continuous Dry Kiln No. TP-1)****Summary Page**

**Description:** Continuous Dry Kiln with a 25 MMBtu/hr wood-fired burner and an 18 MMBtu/hr natural gas-fired backup burner utilized to dry poles and pilings

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
TP-1	Kiln openings on ends	TSP	$E=3.59P^{0.62}$ <b>or</b> $E = 17.31P^{0.16}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
			0.88 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
		PM <sub>10</sub>	0.792 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
		SO <sub>2</sub>	4.0 lb/MMBtu heat input	ADEM Admin. Code r. 335-3-5-.01 (SIP)
		HAP	N/A	40 CFR Part 63 Subpart DDDD
		CO	N/A	N/A
		NOX	N/A	N/A
		VOC	N/A	N/A

## Emission Unit No. 003 (Continuous Dry Kiln No. TP-1)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for TSP and PM<sub>10</sub> established at ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD))."</p> <p>(c) 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.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD</p>
<p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from this unit in excess of the amount determined by the following equation:</p> $E = 3.59P^{0.62} \text{ (P < 30 tons per hour) } \textbf{or}$ $E = 17.31P^{0.16} \text{ (P } \geq \text{ 30 tons per hour)}$ <p>where E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow emissions of TSP from this unit to exceed 0.88 lb/hr.</p> <p>(c) The permittee shall not cause or allow emissions of PM<sub>10</sub> from this unit to exceed 0.792 lb/hr.</p> <p>(d) The permittee shall not cause or allow emissions of sulfur dioxide from this boiler to exceed 4.0 lb/MMBtu of heat input.</p> <p>(e) 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%.</p> <p>(f) The permittee shall not operate both the wood-fired and natural gas burners simultaneously to provide heat to the kiln.</p>	<p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-5-.01(b)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p>

Federally Enforceable Provisos	Regulations
(g) The permittee shall only use untreated wood or natural gas to fire this kiln. Approval must be received from the Air Division prior to burning any other type of fuel.	ADEM Admin. Code r. 335-3-16-.05(a)
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>	
There are no unit specific compliance and performance test methods or procedures applicable to this process.	N/A
<b>4. <u>Emission Monitoring</u></b>	
There are no unit specific emission monitoring requirements applicable to this unit.	N/A
<b>5. <u>Recordkeeping and Reporting Requirements</u></b>	
There are no unit specific recordkeeping and reporting requirements applicable to this unit.	N/A

## Emission Unit No. 026 (Continuous Dual Path Lumber Dry Kiln DPK-1)

### Summary Page

**Description:** 100,000 MBF/yr Continuous, Dual Path, Indirect-Heated Lumber Dry Kiln

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DPK-1	Kiln roof vents	TSP	E=3.59P <sup>0.62</sup> <b>or</b> E = 17.31P <sup>0.16</sup>	ADEM Admin. Code r. 335-3-4-.04 (SIP)
		VOC (as WPP1)	4.43 lbs/MBF	ADEM Admin. Code r. 335-3-14-.04
		HAP	N/A	40 CFR Part 63 Subpart DDDD
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A

**Emission Unit No. 026 (Continuous Dual Path Lumber Dry Kiln DPK-1)****Unit Specific Provisos**

<b>Federally Enforceable Provisos</b>	<b>Regulations</b>
<b>1. <u>Applicability</u></b>  (a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."  (b) This unit is subject to a Best Available Control Technology (BACT) limit for volatile organic compounds (VOC) established pursuant to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".  (c) 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. 335-3-16-.03  ADEM Admin. Code r. 335-3-14-.04  ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD
<b>2. <u>Emission Standards</u></b>  (a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from each unit in excess of the amount determined by the following equation:  $E = 3.59P^{0.62} \text{ (P < 30 tons per hour) } \textbf{or}$ $E = 17.31P^{0.16} \text{ (P } \geq 30 \text{ tons per hour)}$ where E = Emissions in pounds per hour  P = Process weight in tons per hour.  (b) The Permittee shall not cause or allow the VOC emissions from the kiln to exceed 4.430 lb/MBF, measured as WPP1.  (c) 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%.	ADEM Admin. Code r. 335-3-4-.04(1)        ADEM Admin. Code r. 335-3-14-.04  ADEM Admin. Code r. 335-3-4-.01
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>  There are no unit specific compliance and performance test methods or procedures applicable to this process.	N/A



Federally Enforceable Provisos	Regulations
<p><b>4. <u>Emission Monitoring</u></b></p> <p>There are no unit specific emission monitoring requirements applicable to this unit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) The permittee shall develop and submit to the Air Division a site-specific operating and maintenance plan for this kiln. The plan shall identify key parameters to be monitored which are related to VOC emissions from the kiln and the frequency and/or averaging period of the monitoring. Upon Air Division concurrence with the plan, the permittee shall begin implementation of the proposed monitoring and recordkeeping.</p> <p>(b) The permittee shall maintain records documenting its compliance with the proper maintenance and operating practices as determined by their operating and maintenance plan.</p> <p>(c) If this unit 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.</p> <p>(d) 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.</p> <p>(e) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.</p> <p>(f) 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 (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall certify whether all maintenance activities were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-16-05(c)2</p> <p>ADEM Admin. Code r. 335-3-16-05(c)</p>

**Emission Unit No. 027 (Continuous Dual Path Dry Kiln DPK-2)****Summary Page**

**Description:** 100,000 MBF/yr Continuous, Dual Path, Indirect-Heated Lumber Dry Kiln

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DPK-2	Kiln roof vents	TSP	$E=3.59P^{0.62}$ <b>or</b> $E = 17.31P^{0.16}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
		VOC (as WPP1)	4.43 lbs/MBF	ADEM Admin. Code r. 335-3-14-.04 (BACT)
		HAP	N/A	40 CFR Part 63 Subpart DDDD
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A

## Emission Unit No. 027 (Continuous Dual Path Lumber Dry Kiln DPK-2)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to a Best Available Control Technology (BACT) limit for volatile organic compounds (VOC) established pursuant to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]".</p> <p>(c) 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.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from each unit in excess of the amount determined by the following equation:</p> $E = 3.59P^{0.62} \quad (P < 30 \text{ tons per hour}) \text{ or}$ $E = 17.31P^{0.16} \quad (P \geq 30 \text{ tons per hour})$ <p>where      E = Emissions in pounds per hour</p> <p>              P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow the VOC emissions from the kiln to exceed 4.430 lb/MBF, measured as WPP1.</p> <p>(c) 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%.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>There are no unit specific compliance and performance test methods or procedures applicable to this process.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-11-.06(81); 40 CFR Part 63, Subpart DDDD</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>N/A</p>

Federally Enforceable Provisos	Regulations
<p><b>4. <u>Emission Monitoring</u></b></p> <p>There are no unit specific emission monitoring requirements applicable to this unit.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) The permittee shall develop and submit to the Air Division a site-specific operating and maintenance plan for this kiln. The plan shall identify key parameters to be monitored which are related to VOC emissions from the kiln and the frequency and/or averaging period of the monitoring. Upon Air Division concurrence with the plan, the permittee shall begin implementation of the proposed monitoring and recordkeeping.</p> <p>(b) The permittee shall maintain records documenting its compliance with the proper maintenance and operating practices as determined by their operating and maintenance plan.</p> <p>(c) If this unit 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.</p> <p>(d) 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.</p> <p>(e) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.</p> <p>(f) 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 (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall certify whether all maintenance activities were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.</p>	<p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-16-05(c)2</p> <p>ADEM Admin. Code r. 335-3-16-05(c)</p>

**Emission Unit No. 010 (Planer Mill)****Summary Page**

**Description:** Planer Mill Pneumatic Conveyance System w/ Cyclofilter and Closed Loop Cyclone

**Permitted Operating Schedule:**  $\frac{8,760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
PMCF-	Cyclofilter	TSP	$E=3.59P^{0.62}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
			8.6 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A

## Emission Unit No. 010 (Planer Mill)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) 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. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD))."</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from this process in excess of the amount determined by the following equation:</p> $E = 3.59P^{0.62} \text{ (P < 30 tons per hour)}$ <p>where E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow emissions of TSP from this process to exceed 8.6 lb/hr.</p> <p>(c) 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%.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If testing is required, total particulate emissions from this unit shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(c) 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.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</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. 335-3-14-.04</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><b>4. <u>Emission Monitoring</u></b></p> <p>(a) While the process is operating, someone familiar with the process shall observe the visible emissions from the cyclofilter at least <u>daily</u> during daylight hours.</p> <p>(b) Whenever any visible emissions are observed from the cyclofilter, the observer shall note the occurrence and notify the appropriate operations supervisor. The supervisor shall immediately investigate the cause of the exceedance. If it is determined that the exceedance is caused by operator error, operational procedures shall be modified to prevent a recurrence of the error. If the exceedance is determined to be the result of a mechanical failure, the system shall be immediately modified or repaired to return the system to its normal operation. Once the system has been returned to its normal operating condition, an additional visible emissions observation shall be conducted on the cyclofilter. If the observation notes any visible emissions from the cyclofilter, the above steps shall be repeated until an observation indicates no visible emissions are noted from the cyclofilter.</p> <p>(c) The cyclone and cyclofilter shall be inspected for proper operation at least annually but more frequently whenever visible emissions are observed. If the inspection indicates that cleaning or emission-related maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours after completing the inspection.</p> <p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(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:</p> <p>(i) The date, time, and results of each emission observation;</p> <p>(ii) The date(s), time, duration, and cause of any excursion from a monitoring parameter;</p> <p>(iii) The dates of the annual inspections of the cyclone and cyclofilter and whether the inspection indicated that cleaning or emission-related maintenance was needed;</p> <p>(iv) The date(s), time, nature, and results of emission-related corrective action(s) taken (including cleaning).</p> <p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall include the following information for this emission unit:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(i) 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;</li> <li>(ii) The date(s), time, duration, and cause of any excursions from a monitoring parameter;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken (including cleaning).</li> </ul>	



## Emission Unit No. 011 (Box Factory)

### Summary Page

**Description:** Box Factory with pneumatic conveyance system utilizing four cyclones

$$\text{Permitted Operating Schedule: } \frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
BFC-1	Box Factory Cyclone Exhaust	TSP	$E=4.10P^{0.67}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
BFC-2	Box Factory Cyclone Exhaust	TSP	$E=4.10P^{0.67}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
BFC-3	Box Factory Cyclone Exhaust	TSP	$E=4.10P^{0.67}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
BFC-4	Box Factory Cyclone Exhaust	TSP	$E=4.10P^{0.67}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
BFC-1 through BFC-4	Box Factory Cyclone Exhaust	CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A

## Emission Unit No. 011 (Box Factory)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p>
<p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from this process in excess of the amount determined by the following equation:</p> $E = 4.10P^{0.67}$ <p>where E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</p> <p>(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%.</p>	<p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p>
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If testing is required, the particulate matter (as TSP) emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the opacity of stack emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</p> <p>(c) 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.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>
<p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) While the process is operating, someone familiar with the process shall observe the visible emissions from each cyclone at least <u>daily</u> during daylight hours for greater than normal emissions from the cyclone, as determined by previous observations of normal operations.</p> <p>(b) Whenever observed visible emissions are greater than normal from a cyclone, the observer shall note the occurrence and notify the appropriate operations supervisor. The supervisor shall immediately investigate the cause of the exceedance. If it is determined that the exceedance is caused by operator error,</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>



## Emission Unit No. 012 (Specialty Shop)

### Summary Page

**Description:** Specialty shop with pneumatic conveyance system utilizing a cyclone

**Permitted Operating Schedule:**  $\frac{4,800 \text{ Hours}}{\text{Year}}$

#### Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
SSC-1	Cyclone Exhaust	TSP	$E=3.59P^{0.62}$	ADEM Admin. Code r. 335-3-4-.04 (SIP)
			5.47 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A

**Emission Unit No. 012 (Specialty Shop)**  
**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) 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. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration (PSD))."</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter (as TSP) in any one hour from this process in excess of the amount determined by the following equation:</p> $E = 3.59P^{0.62} \text{ (P < 30 tons per hour)}$ <p>where E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</p> <p>(b) The permittee shall not cause or allow emissions of TSP from this process to exceed 5.47 lb/hr.</p> <p>(c) 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%.</p> <p>(d) The permittee shall not cause or allow the hours of operation of this process to exceed 4,800 hours during any consecutive 12-month period.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If testing is required, the particulate matter (as TSP) emission rate shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the opacity of stack emissions 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. 335-3-14-.04</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-14-.04</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> <p>ADEM Admin. Code r. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>(c) 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.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p>
<p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) While the process is operating, someone familiar with the process shall observe the visible emissions from the cyclone at least <u>daily</u> during daylight hours for greater than normal emissions from the cyclone, as determined by previous observations of normal operations.</p> <p>(b) Whenever observed visible emissions are greater than normal from the cyclone, the observer shall note the occurrence and notify the appropriate operations supervisor. The supervisor shall immediately investigate the cause of the exceedance. If it is determined that the exceedance is caused by operator error, operational procedures shall be modified to prevent a recurrence of the error. If the exceedance is determined to be the result of a mechanical failure, the system shall be immediately modified or repaired to return the system to its normal operation. Once the system has been returned to its normal operating condition, an additional visible emissions observation shall be conducted on the cyclone. If the observation notes greater than normal visible emissions from the cyclone, the above steps shall be repeated until an observation indicates no greater than normal visible emissions are noted from the cyclone.</p> <p>(c) The cyclone shall be inspected for proper operation at least annually but more frequently whenever observed visible emissions are greater than normal. If the inspection indicates that cleaning or emission-related maintenance is needed, such action shall be initiated as soon as practicable but no longer than 24 hours after completing the inspection.</p> <p>(d) Within ten (10) days of the end of each calendar month, the permittee shall calculate the operating hours of the process for the previous calendar month and previous 12-month period to determine compliance with the operating hour limitation.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(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:</p> <p>(i) The date, time, and results of each emission observation;</p> <p>(ii) The date(s), time, duration, and cause of any excursion from a monitoring parameter;</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(iii) The dates of the annual inspections of the cyclone (SSC-1) and whether the inspection indicated that cleaning or emission-related maintenance was needed;</li> <li>(iv) The date(s), time, nature, and results of emission-related corrective action(s) taken (including cleaning); and</li> <li>(v) The hours of operation for this process on a monthly and 12-month rolling total basis.</li> </ul> <p>(b) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual reporting period (December 21<sup>st</sup> – June 20<sup>th</sup> and June 21<sup>st</sup> – December 20<sup>th</sup>). The report shall include the following information for this emission unit:</p> <ul style="list-style-type: none"> <li>(i) A statement as to whether all 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;</li> <li>(ii) The date(s), time, duration, and cause of any excursions from a monitoring parameter;</li> <li>(iii) The date(s), time, nature, and results of any emission-related corrective action(s) taken (including cleaning); and</li> <li>(iv) The monthly and 12-month rolling totals of the hours of operation for this process calculated during the reporting period.</li> </ul>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

## Emission Unit No. 013 (Sawmill Operations)

### Summary Page

**Description:** Sawmill (equipment consists of rip saws, band saws, edger, and trim saw)

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
FUG	Sawmill operations (Fugitive Emissions)	TSP	N/A	N/A
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A



## Emission Unit No. 013 (Sawmill Operations)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<b>1. <u>Applicability</u></b>  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>2. <u>Emission Standards</u></b>  The emission standards for this unit are outlined in the Provisos for Facility-Wide Fugitive Dust Plan below.	ADEM Admin. Code r. 335-3-4-.02
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>  The unit specific compliance and performance test methods for this unit are outlined in the Provisos for Facility-Wide Fugitive Dust Plan below.	ADEM Admin. Code r. 335-3-16-.07
<b>4. <u>Emission Monitoring</u></b>  The emission monitoring requirements for this unit are outlined in the Provisos for Facility-Wide Fugitive Dust Plan below.	ADEM Admin. Code r. 335-3-16-.05
<b>5. <u>Recordkeeping and Reporting Requirements</u></b>  The recordkeeping requirements for this unit are outlined in the Provisos for Facility-Wide Fugitive Dust Plan below.	ADEM Admin. Code r. 335-3-16-.07

## Emission Unit No. 024 (Gasoline Storage Tank)

### Summary Page

**Description:** 9,000 gallon fixed-roof gasoline storage tank (T-6) with submerged fill pipe

**Permitted Operating Schedule:**  $\frac{24 \text{ Hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

### Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
T-6	Tank vents	VOC	N/A	N/A
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A

## Emission Unit No. 024 (Gasoline Storage Tank)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<b>1. <u>Applicability</u></b>  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>2. <u>Emission Standards</u></b>  The permittee shall not cause or allow gasoline to be placed into this tank except by the use of a submerged fill pipe.	ADEM Admin. Code r. 335-3-6-.03(2)
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>  There are no unit specific test methods and procedures applicable to this tank.	N/A
<b>4. <u>Emission Monitoring</u></b>  There are no unit specific emission monitoring requirements applicable to this tank.	N/A
<b>5. <u>Recordkeeping and Reporting Requirements</u></b>  There are no unit recordkeeping and reporting requirements emission monitoring requirements applicable to this tank.	N/A

**Emission Unit No. 025 (240 HP Diesel-fired Emergency Fire Water Pump Engine)**  
**Summary Page**

**Description:** 240 HP Diesel-fired Emergency Fire Water Pump Engine

**Permitted Operating Schedule:**  $\frac{24 \text{ hours}}{\text{Day}} \times \frac{7 \text{ Days}}{\text{Week}} \times \frac{52 \text{ Weeks}}{\text{Year}} = \frac{8760 \text{ Hours}}{\text{Year}}$

**Emission limitations:**

Emission Point No.	Description	Pollutant	Emission limit	Regulation
E-1	240 HP Engine Exhaust for fire water pump	PM	N/A	N/A
		CO	N/A	N/A
		NO <sub>x</sub>	N/A	N/A
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	N/A

**Emission Unit No. 025 (240 HP Diesel-fired Emergency Fire Water Pump Engine)**

## Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This unit is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ, and the applicable requirements of 40 CFR Part 63, Subpart A, General Provisions as provided in Table 8 to Subpart ZZZZ.</p> <p><b>2. <u>Emission Standards</u></b></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:</p> <p>(i) Change oil and filter every 500 hours of operation or annually, whichever comes first, or utilize an oil analysis program in accordance with 40 CFR §63.6625(i) to extend the specified oil change requirement;</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 Part 63, Subpart ZZZZ</p> <p>40 CFR §63.6602</p>

Federally Enforceable Provisos	Regulations
<p>(3) If this 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. Sources must report any failure to perform the work practice on the schedule required and the federal, state, or local law under which the risk was deemed unacceptable.</p> <p>(b) Utilize fuel for this engine as required in 40 CFR §63.6604(b).</p> <p>(c) Operate the engine only as provided in 40 CFR §63.6640(f)(1-3), which includes:</p> <p>(1) Emergency situations (no time limit);</p> <p>(2) Maintenance checks and readiness testing, not to exceed 100 hours per calendar 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><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>There are no performance test methods or procedures associated with this unit.</p>	<p>N/A</p>
<p><b>4. <u>Emission Monitoring</u></b></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>(b) The permittee shall install a non-resettable hour meter if one is not already installed.</p>	<p>40 CFR §63.6625(e) &amp; 40 CFR §63.6640(a)</p> <p>40 CFR §63.6625(f)</p>
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></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)</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 this 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 this unit or the maintenance plan for this unit developed in accordance with 40 CFR §63.6625(e).</p> <p>(c) The permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 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. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.</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>40 CFR §63.6625(e)</p> <p>40 CFR §63.6660, and 40 CFR §63.10(b)(1)</p> <p>40 CFR §63.6640(b)</p>

## Provisos for Facility-Wide Fugitive Dust Plan

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This facility is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p><b>2. <u>Emission Standards</u></b></p> <p>The permittee shall take reasonable precautions as directed in General Proviso 18 to prevent fugitive dust at the facility which travel beyond the facility property line and cause a nuisance.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>The permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p> <p><b>4. <u>Emission Monitoring</u></b></p> <p>The permittee shall conduct weekly visual observations for fugitive dust in areas listed with the potential to generate fugitive dust, considering factors such as naturally wet conditions. If visible emissions are observed traveling beyond the facility property line, any necessary corrective actions shall be initiated within four (4) hours of observation.</p> <p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>The permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of Proviso 4. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</p>	<p>ADEM Admin. Code r. 335-3-16-.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**

**T. R. Miller Mill Co., Inc.**  
**Brewton, Alabama**

**Fugitive Dust Plan**  
**November 1, 2025**

*(Implementation of this plan will begin upon Title V Permit renewal issuance)*

T. R. Miller Mill, Co., Inc., shall take reasonable precautions to prevent particulate matter from creating a fugitive dust nuisance beyond the facility property line.

In general, fugitive dust might originate from some unpaved roads, material conveyance systems, or storage piles. T. R. Miller will employ monthly inspections in areas that might create fugitive dust and travel beyond the property line. Corrective actions will be initiated if inspections indicate this may be occurring.

Corrective actions employed could include periodic wetting of areas or slowing vehicular traffic. Other actions could be utilized based on the nature of the source of any fugitive dust nuisance. The inspection sheet will describe any actions taken if a fugitive dust nuisance is identified that may travel beyond the facility property line.

## **VEHICULAR TRAFFIC**

### Lumber Division

The majority of the routine traffic at the Lumber Division utilizes paved roads. In areas that do not utilize paved roads, visible inspections will be used to identify and address any fugitive dust nuisance issues that could travel beyond the facility boundary.

### Pole Division

The road to the Pole Division is paved, but the storage yard is unpaved. T. R. Miller will utilize visible inspections to identify and address any fugitive dust nuisance issues that could travel beyond the facility boundary.

## **MATERIAL HANDLING AND STORAGE PILES**

### Lumber Division

The majority of the Lumber Division utilizes the pneumatic transfer of wood byproducts, and the permit already has provisions in place regarding this transfer. There is limited handling of wood byproducts using mechanical conveyance outside, primarily the mechanical conveyance to the boiler fuel pile. This area will be included in the routine visible inspections. The boiler fuel pile and the boiler ash pile will also be included.

### Pole Division

The fuel supply to the direct-fired kiln uses mechanical conveyance. This conveyance is covered, so fugitive dust is not expected. The fuel pile is also protected from wind on three sides and is roofed. The fuel dumps into an enclosed silo reducing any potential for fugitive dust. This system will be part of the visible inspections. The ash pile sourced from combustion in the direct-fired kiln will also be included.

**T. R. Miller Mill Company, Inc.**  
**Brewton, AL**  
**Fugitive Dust Control Plan WEEKLY Inspection Sheet**  
**QUARTER:\_\_\_\_\_ YEAR:\_\_\_\_\_**

Weekly Inspection Date	Inspector	Lumber Division				Pole Division			
		Vehicular Traffic		Material Handling and Storage Piles		Vehicular Traffic		Material Handling and Storage Piles	
		Fugitive dust nuisance observed beyond facility property line?	Housekeeping or Corrective Actions Needed?	Fugitive dust nuisance observed beyond facility property line?	Housekeeping or Corrective Actions Needed?	Fugitive dust nuisance observed beyond facility property line?	Housekeeping or Corrective Actions Needed?	Fugitive dust nuisance observed beyond facility property line?	Housekeeping or Corrective Actions Needed?
Housekeeping or Corrective Actions Implemented (if needed)									
Date	Lumber Division				Pole Division				