



# MAJOR SOURCE OPERATING PERMIT

**PERMITTEE:** TWO RIVERS LUMBER CO., LLC.

**FACILITY NAME:** TWO RIVERS LUMBER – DEMOPOLIS FACILITY

**FACILITY/PERMIT NO.:** 105-S007

**LOCATION:** DEMOPOLIS, MARENGO 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:**

**Effective Date:**

**Expiration Date:**

## Table of Contents

<b>GENERAL PERMIT PROVISOS .....</b>	<b>1</b>
1. <u>Transfer</u> .....	1
2. <u>Renewals</u> .....	1
3. <u>Severability Clause</u> .....	1
4. <u>Compliance</u> .....	1
5. <u>Termination for Cause</u> .....	2
6. <u>Property Rights</u> .....	2
7. <u>Submission of Information</u> .....	2
8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u> .....	2
9. <u>Certification of Truth, Accuracy, and Completeness</u> .....	2
10. <u>Inspection and Entry</u> .....	2
11. <u>Compliance Provisions</u> .....	3
12. <u>Compliance Certification</u> .....	3
13. <u>Reopening for Cause</u> .....	4
14. <u>Additional Rules and Regulations</u> .....	4
15. <u>Equipment Maintenance or Breakdown</u> .....	5
16. <u>Operation of Capture and Control Devices</u> .....	5
17. <u>Obnoxious Odors</u> .....	6
18. <u>Fugitive Dust</u> .....	6
19. <u>Additions and Revisions</u> .....	6
20. <u>Recordkeeping Requirements</u> .....	7
21. <u>Reporting Requirements</u> .....	7
22. <u>Emission Testing Requirements</u> .....	7
23. <u>Payment of Emission Fees</u> .....	8
24. <u>Other Reporting and Testing Requirements</u> .....	9
25. <u>Title VI Requirements (Refrigerants)</u> .....	9
26. <u>Chemical Accidental Prevention Provisions</u> .....	9
27. <u>Display of Permit</u> .....	10
28. <u>Circumvention</u> .....	10
29. <u>Visible Emissions</u> .....	10
30. <u>Fuel-Burning Equipment</u> .....	10
31. <u>Process Industries – General</u> .....	10
32. <u>Averaging Time for Emission Limits</u> .....	10
33. <u>Open Burning</u> .....	11
34. <u>Permit Shield</u> .....	11
<b>EMISSION UNIT NO. 001 (SAWMILL AND GREEN END OPERATIONS).....</b>	<b>12</b>
<i>Summary Page</i> .....	12
<i>Unit Specific Provisos</i> .....	13
1. <u>Applicability</u> .....	13
2. <u>Emission Standards</u> .....	13
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	13
4. <u>Emission Monitoring</u> .....	13
5. <u>Recordkeeping and Reporting Requirements</u> .....	13

## Table of Contents

<b>EMISSION UNIT NOS. 002 &amp; 003 [TWO (2) CONTINUOUS DIRECT-FIRED KILNS]</b> .....	<b>15</b>
<i>Summary Page</i> .....	15
<i>Unit Specific Provisos</i> .....	16
1. <u>Applicability</u> .....	16
2. <u>Emission Standards</u> .....	16
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	17
4. <u>Emissions Monitoring</u> .....	17
5. <u>Recordkeeping and Reporting Requirements</u> .....	19
<b>EMISSION UNIT NO. 004 (PLANER MILL OPERATIONS)</b> .....	<b>20</b>
<i>Summary Page</i> .....	20
<i>Unit Specific Provisos</i> .....	21
1. <u>Applicability</u> .....	21
2. <u>Emission Standards</u> .....	21
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	21
4. <u>Emission Monitoring</u> .....	22
5. <u>Recordkeeping and Reporting Requirements</u> .....	22
<b>EMISSION UNIT NO. 005 (EMERGENCY FIRE PUMP ENGINE)</b> .....	<b>24</b>
<i>Summary Page</i> .....	24
<i>Unit Specific Provisos</i> .....	25
1. <u>Applicability</u> .....	25
2. <u>Emission Standards</u> .....	25
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	26
4. <u>Emission Monitoring</u> .....	26
5. <u>Recordkeeping and Reporting Requirements</u> .....	26
<b>EMISSION UNIT NO. 006 (EMERGENCY GENERATOR ENGINE)</b> .....	<b>28</b>
<i>Summary Page</i> .....	28
<i>Unit Specific Provisos</i> .....	29
1. <u>Applicability</u> .....	29
2. <u>Emission Standards</u> .....	29
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	29
4. <u>Emission Monitoring</u> .....	29
5. <u>Recordkeeping and Reporting Requirements</u> .....	30
<b>PROVISOS FOR FACILITY-WIDE FUGITIVE DUST PLAN</b> .....	<b>32</b>
1. <u>Applicability</u> .....	32
2. <u>Emission Standards</u> .....	32
3. <u>Compliance and Performance Test Methods and Procedures</u> .....	32
4. <u>Emission Monitoring</u> .....	32
5. <u>Recordkeeping and Reporting Requirements</u> .....	32
<b>APPENDIX A FUGITIVE DUST MANAGEMENT PLAN</b> .....	<b>33</b>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<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><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><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><b>4. <u>Compliance</u></b></p> <p><b>(a)</b> 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>(b)</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-.02(6)</p> <p>ADEM Admin. Code r. 335-3-16-.12(2)</p> <p>ADEM Admin. Code r. 335-3-16-.05(e)</p> <p>ADEM Admin. Code r. 335-3-16-.05(f)</p> <p>ADEM Admin. Code r. 335-3-16-.05(g)</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<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><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><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><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><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><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>ADEM Admin. Code r. 335-3-16-.05(h)</p> <p>ADEM Admin. Code r. 335-3-16-.05(i)</p> <p>ADEM Admin. Code r. 335-3-16-.05(j)</p> <p>ADEM Admin. Code r. 335-3-16-.05(k)</p> <p>ADEM Admin. Code r. 335-3-16-.07(a)</p> <p>ADEM Admin. Code r. 335-3-16-.07(b)</p>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<p>(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;</p> <p>(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;</p> <p>(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. <u>Compliance Provisions</u></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. <u>Compliance Certification</u></b></p> <p>The permittee shall submit a complete and accurate compliance certification by <b>November 17th</b> of each year for each annual reporting period of this permit (September 18<sup>th</sup> – September 17<sup>th</sup>).</p> <p>(a) The compliance certification shall include the following:</p> <p>(1) The identification of each term or condition of this permit that is the basis of the certification;</p> <p>(2) The compliance status;</p> <p>(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);</p> <p>(4) Whether compliance has been continuous or intermittent;</p> <p>(5) Such other facts as the Air Division may require to determine the compliance status of the source;</p>	<p>ADEM Admin. Code r. 335-3-16-.07(c)</p> <p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<p>(b) The compliance certification shall be submitted to:</p> <p style="text-align: center;">Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463</p> <p style="text-align: center;">and to:</p> <p style="text-align: center;">EPA Region 4 via email at EPA_R4_CAA_Reports@epa.gov or through the EPA's Compliance and Emissions Data Reporting Interface (CEDRI)</p> <p><b>13. <u>Reopening for Cause</u></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 ensure compliance with the applicable requirements.</p> <p><b>14. <u>Additional Rules and Regulations</u></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>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<p><b>15. <u>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> <ul 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> </ul> <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>16. <u>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>



## General Permit Provisos

Federally Enforceable Provisos	Regulations
<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><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><b>19. <u>Additions and Revisions</u></b></p> <p>Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code r. 335-3-16-.13 or 335-3-16-.14.</p>	<p>ADEM Admin. Code r. 335-3-1-.08</p> <p>ADEM Admin. Code r. 335-3-4-.02</p> <p>ADEM Admin. Code r. 335-3-16-.13 and 335-3-16-.14</p>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<p><b>20. <u>Recordkeeping Requirements</u></b></p> <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>	<p>ADEM Admin. Code r. 335-3-16-.05(c)2.</p>
<p><b>21. <u>Reporting Requirements</u></b></p> <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>	<p>ADEM Admin. Code r. 335-3-16-.05(c)3.</p>
<p><b>22. <u>Emission Testing Requirements</u></b></p> <p>Each point of emission which requires testing shall be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.</p>	<p>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p>The Air Division must be notified in writing at least <b>10 days</b> 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 require 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 <b>30 days</b> of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	<p>ADEM Admin. Code r. 335-3-1-.04</p>
<p><b>23. <u>Payment of Emission Fees</u></b></p> <ul style="list-style-type: none"> <li>(a) The permittee shall remit the annual Operating Permit Fees required by ADEM Admin. Code r. 335-1-7-.04 according to the schedule in ADEM Admin. Code r. 335-1-7-.05.</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>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<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><b>25. <u>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><b>26. <u>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>ADEM Admin. Code r. 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-16-.05(a)</p> <p>40 CFR Part 68</p>

## General Permit Provisos

Federally Enforceable Provisos	Regulations
<p><b>27. <u>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><b>28. <u>Circumvention</u></b></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminants emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p> <p><b>29. <u>Visible Emissions</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p> <p><b>30. <u>Fuel-Burning Equipment</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-5-.01.</p> <p><b>31. <u>Process Industries – General</u></b></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p> <p><b>32. <u>Averaging Time for Emission Limits</u></b></p> <p>Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.</p>	<p>ADEM Admin. Code r. 335-3-14-.01(1)(d)</p> <p>ADEM Admin. Code r. 335-3-1-.10</p> <p>ADEM Admin. Code r. 335-3-4-.01(1)</p> <p>ADEM Admin. Code r. 335-3-4-.03</p> <p>ADEM Admin. Code r. 335-3-5-.01</p> <p>ADEM Admin. Code r. 335-3-4-.04</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>

General Permit Provisos	
Federally Enforceable Provisos	Regulations
<p><b>33. <u>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><b>34. <u>Permit Shield</u></b></p> <p>A permit shield exists under this operating permit in accordance with ADEM Administrative Code r. 335-3-16-.10 in that compliance with the conditions in this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in the Regulatory Review Section of the application for this permit. Under this shield, it has been determined that requirements listed as non-applicable in such section are not applicable to this source.</p>	<p>ADEM Admin. Code r. 335-3-3-.01</p> <p>ADEM Admin. Code r. 335-3-16-.10</p>

## Emission Unit No. 001 (Sawmill and Green End Operations)

### Summary Page

**Description:** Green End Operations [Log Debarker (LD-1), Log Bucking (LB-1), Bark Hog (BH-1), and mechanical conveyors to the Bark Storage Bin (BSB-1)]

Sawmill (SM-1), Sawmill Chipper (SC-1), and mechanical conveyors to the Sawdust and Chip Storage Bins (SDSB-1 & CSB-1)

Truck loadout operations for storage bins (BSB-1, SDSB-1, & CSB-1)

**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 ID	Description	Pollutant	Emission limit	Regulation
LD-1	Fugitive Emissions	PM	N/A	N/A
LB-1				
BH-1				
SM-1				
SC-1				
BSB-1				
SDSB-1				
CSB-1				

**Emission Unit No. 001 (Sawmill and Green End Operations)**  
**Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This source is subject to the applicable requirements of 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>There are no emission standards for this process.</p>	
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) There are no compliance or performance test methods and procedures for this process.</p>	
<p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) At least once per week, the Permittee shall inspect the conveyer systems and transfer points for leaks.</p> <p>(b) The Permittee shall operate the conveyer systems in a manner to ensure materials are confined.</p> <p>(c) The Permittee shall inspect the conveyer belts at least once each calendar quarter for serviceability and repair them as necessary.</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) Records of emission monitoring performed shall be maintained in a permanent form on-site and available for inspection for at least five (5) years from the date of generation of each record. These records shall include:</p> <p>(1) The date, time, and results of each conveyer system and transfer point inspection and the name of the individual performing the inspection;</p> <p>(2) If the results of the inspection indicated that maintenance was needed, the date(s) and nature of maintenance performed.</p>	<p>ADEM Admin. Coder. 335-3-16-.05</p>



Federally Enforceable Provisos	Regulations
<p><b>(b)</b> A semiannual Monitoring Report, as required by General Permit Proviso No. 21, shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1<sup>st</sup> to June 30<sup>th</sup> and July 1<sup>st</sup> to December 31<sup>st</sup>). The report shall include the following information for this unit:</p> <p><b>(1)</b> A statement as to whether all emission monitoring was completed as required during the reporting period, and if not, the date(s) and reason(s) why emission monitoring was not performed;</p> <p><b>(2)</b> The date(s), nature, and results of any maintenance that was needed.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)3</p>

## Emission Unit Nos. 002 & 003 [Two (2) Continuous Direct-Fired Kilns]

### Summary Page

**Description:** 15.4 MBF/hr Continuous, Dual Path Direct-Fired Lumber Dry Kiln (DPK-1) with 38.8 MMBtu/hr Natural Gas-Fired Burner and associated 4 MMBtu/hr Natural Gas-Fired Kiln Condensate Evaporator (CE-1)

15.4 MBF/hr Continuous, Dual Path Direct-Fired Lumber Dry Kiln (DPK-2) with 38.8 MMBtu/hr Natural Gas-Fired Burner and associated 4 MMBtu/hr Natural Gas-Fired Kiln Condensate Evaporator (CE-2)

### Emission limitations:

Emission Point No.	Description	Pollutant	Emission limit	Regulation
DPK-1	Dual Path Kilns No. 1 and No. 2	VOC	3.80 lb/MBF (VOC as Carbon)	PSD/BACT
DPK-2		PM	1.30 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
CE-1	Condensate Evaporators No. 1 and No. 2	PM	0.07 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)
CE-2			$E = 1.38H^{0.44}$	ADEM Admin. Code r. 335-3-4-.03 (SIP)

**Emission Unit Nos. 002 & 003 [Two (2) Continuous Direct-Fired Kilns]  
Unit Specific Provisos**

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>(a) These units are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This source is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rates for PM established at 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) These units are subject to the applicable requirements of 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 10 to Subpart DDDD.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from DPK-1 or DPK-2 more than the amount determined by the following equation:</p> $E = 3.59P^{0.62} \quad (P < 30 \text{ TPH})$ <p style="text-align: center;">Or</p> $E = 17.31P^{0.16} \quad (P \geq 30 \text{ TPH})$ <p style="text-align: center;">where</p> <p>E = Emissions in pounds per hour</p> <p>P = Process weight in tons per hour.</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) and 335-3-11-.06(1)</p> <p>ADEM Admin. Code r. 335-3-4-.04</p>

Federally Enforceable Provisos	Regulations
<p>(b) The permittee shall not cause or allow particulate emissions from either natural gas burner (CE-1 or CE-2) to exceed the allowable emission rate as calculated using the following equation:</p> $E = 1.38H^{0.44}$ <p>Where E = Emissions in lb/million BTU</p> <p>H = Heat Input in millions of BTU/hr</p> <p>(c) The Permittee shall not cause or allow the particulate matter emission rate from each kiln to exceed 1.30 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5. Alternate test methods may be used provided prior approval by the Air Division is granted.</p> <p>(d) The Permittee shall not cause or allow the particulate matter emission rate from each evaporator to exceed 0.07 lb/hr, as measured in accordance with 40 CFR Part 60, Appendix A, Method 5. Alternate test methods may be used provided prior approval by the Air Division is granted.</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%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.</p> <p>(f) The permittee shall not cause or allow the volatile organic compound (VOC) emissions from each kiln to exceed 3.80 lb/MBF (measured as carbon).</p>	<p>ADEM Admin. Code r. 335-3-4-.03</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. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-14-.04</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><b>4. <u>Emissions Monitoring</u></b></p>	
<p>(a) The permittee shall follow proper maintenance and operating practices as recommended by the manufacturer, which include but may not be limited to the following:</p> <p>1) Proper operation practices:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>i. Operate kilns within a target temperature range of 220°F to 260°F depending on the dimensions of lumber being dried. Kiln temperature is the average of multiple continually monitored dry bulb measurements. Kiln temperature exceeding 260°F will result in a kiln shutdown. Records of high temperature shutdowns are maintained by the facility. Air Division should be notified within 48 hours or two (2) working days of shutdowns due to high temperature;</li> <li>ii. Lumber should be dried to a target moisture of 10% or greater. The moisture content of finished lumber will be automatically measured at the infeed of the grader for the Planer Mill. Moisture content measurements below 10% will be flagged in the data collection system. Records of average moisture content per production run below 10% will be maintained by the facility. Production runs with average moisture content below 10% will be reported to the Air division within 48 hours or two (2) working days.</li> </ul> <p><b>2) Proper maintenance practices</b></p> <ul style="list-style-type: none"> <li>i. Conduct daily routine maintenance to include cleaning debris from around kiln and pusher tracks, and visually inspect the primary air fan, gas train, and gas burner on the kiln burner;</li> <li>ii. Conduct weekly inspections of fan drives, belts, kiln fan shafts, cart pusher hydraulics fluid level, and routine maintenance to include the greasing kiln fan shafts, leak checks on hydraulics and connections;</li> <li>iii. Conduct quarterly inspections of plenum hatched, cleaning as necessary;</li> <li>iv. Conduct semiannual routine maintenance to include inspect fan bearings and grease as necessary, replace hydraulic filter on kiln cart pusher hydraulics, grease kiln cart pusher axial bearing and wheels, inspect baffles and brushes, and grease primary air fan electric motors on the kiln burner.</li> </ul>	

Federally Enforceable Provisos	Regulations
<p>v. Conduct annual routine maintenance to include grease kiln fan and cart pusher hydraulics electric motors, lubricate hinges on door baffles and man doors, hinge and linkage lubrication on kiln vents, complete natural gas system inspection of gas train and gas burner on the kiln burner.</p>	
<p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) The permittee shall maintain records documenting its compliance with the proper operating and maintenance and maintain records of the combined throughput for DPK-1 and DPK-2 on a monthly and 12-month rolling total basis.</p> <p>(b) Within ten (10) days of the end of each calendar month, the Permittee shall calculate the total combined throughput for DPK-1 and DPK-2 for the previous calendar month and the previous 12-month period.</p> <p>(c) The permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five years from the date of generation of each record.</p> <p>(d) If these kilns should exceed an applicable limit at any time, the permittee shall notify the Air Division in writing within two (2) working days of determining that the exceedance occurred.</p> <p>(e) The permittee shall submit a Semiannual Monitoring Report for these kilns to the Air Division as part of the Semiannual Monitoring Report as required by General Permit Proviso No. 21(a), shall be submitted no later than 60 days after the end of each semiannual reporting period (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). This report shall include a certification that all emission monitoring and recordkeeping was 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. 335-3-16-.05(c)</p>

**Emission Unit No. 004 (Planer Mill Operations)**  
**Summary Page**

**Description:** Planer Mill (PM-1) Operations with a Shavings Storage Bin (SSB-1) and a Cyclofilter (CF-1) [SMS]

**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
CF-1	Cyclofilter	PM	$E = 3.59(P)^{0.62}$ for P<30 TPH Or $E = 17.31(P)^{0.16}$ for P≥30 TPH	ADEM Admin. Code r. 335-3-4-.04
			0.048 lb/hr	ADEM Admin. Code r. 335-3-14-.04 (SMS)

**Emission Unit No. 004 (Planer Mill Operation)**  
**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 process is subject to synthetic minor source limits to restrict its potential to emit below the significant emission rate for PM established at ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas (Prevention of Significant Deterioration Permitting (PSD))".</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the emission of particulate matter in any one hour from each of these units in excess of the amount determined by the following equation:</p> $E = 3.59 P^{0.62} (P < 30 \text{ TPH})$ <p style="text-align: center;">Or</p> $E = 17.31 P^{0.16} (P \geq 30 \text{ TPH})$ <p style="text-align: center;">where <math>E</math> = Emissions in pounds per hour</p> <p style="text-align: center;"><math>P</math> = Process weight in tons per hour</p> <p>(b) The permittee shall not cause or allow the TSP emissions from this source to exceed 0.048 lb/hr.</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%. Opacity shall be determined by 40 CFR Part 60, Appendix A, Method 9.</p> <p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>(a) If testing is required, the emissions of total particulate matter from this unit shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.</p> <p>(b) If testing is required, the emissions of PM<sub>10</sub> and PM<sub>2.5</sub> from this unit shall be determined in accordance with EPA Reference Methods 201A.</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</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>



Federally Enforceable Provisos	Regulations
<p>(c) If testing is required, the opacity of emissions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.</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 cyclofilter exhaust a minimum of once <u>daily</u> during daylight hours for greater than normal visible emissions as determined by pervious observations.</p> <p>(b) Whenever observed visible emissions are greater than normal from the cyclofilter exhaust, corrective action to minimize emissions shall be initiated as soon as practicable but no longer than 24 hours from the time of the observation, followed by an additional observation to confirm that emissions are reduced to normal.</p> <p>(c) The cyclofilter shall be physically inspected for proper maintenance at least annually, but more frequently whenever observed visible emissions are greater than normal. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated within 24 hours of completing the inspection.</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 records of emission monitoring performed in a permanent form suitable for inspection, upon request, and on-site for at least five (5) years from the date of generation of each record. These records shall include:</p> <p style="padding-left: 40px;">(1) The date, time, and results of each <u>daily</u> observation for greater than normal visible emissions;</p> <p style="padding-left: 40px;">(2) The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed;</p> <p style="padding-left: 40px;">(3) The date(s) and time the cyclofilter was inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.</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 (January 1<sup>st</sup> – June 30<sup>th</sup> and July 1<sup>st</sup> – December 31<sup>st</sup>). The report shall include 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>

Federally Enforceable Provisos	Regulations
<p>(1) A statement as to whether all observations for greater than normal visible emissions were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed;</p> <p>(2) A statement as to whether the annual inspection of the cyclofilter was accomplished during the reporting period, and if so, the date and results of the inspection;</p> <p>(3) The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed or (2) an inspection of the cyclones indicated that cleaning or emissions-related maintenance was needed.</p>	

**Emission Unit No. 005 (Emergency Fire Pump Engine)**

**Summary Page**

**Description:** 321 bHp John Deere Compression Ignition Diesel-fired Internal Combustion  
Emergency Fire Pump Engine (ENG1)

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

**Emission limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
ENG1	321 bHp John Deere CI Diesel-fired Emergency Fire Pump Engine	PM	0.20 g/KW-hr	ADEM Admin. Code r. 335-10-.02(87) 40 CFR Part 60, Subpart IIII
		CO	3.5 g/KW-hr	
		NMHC+NO <sub>x</sub>	4.00 g/KW-hr	
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	40 CFR §63.6580

**Emission Unit No. 005 (Emergency Fire 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 an affected source under 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</p> <p>(c) This unit is subject to the applicable provisions of 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR Part 60, Subpart A as specified in Table 3 to Subpart IIII.</p> <p><b>2. <u>Emission Standards</u></b></p> <p>(a) The permittee shall not cause or allow the sum of emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NOx) to exceed 4.00 g/kW-hr from ENG1.</p> <p>(b) The permittee shall not cause or allow the emissions of carbon monoxide (CO) to exceed 3.5 g/KW-hr for ENG1.</p> <p>(c) The permittee shall not cause or allow the emissions of particulate matter (PM) to exceed 0.20 g/kW-hr from ENG1.</p> <p>(d) The permittee shall not purchase any diesel fuel for this unit that does not meet the following per-gallon standards of 40 CFR §80.510(b):</p> <p style="padding-left: 40px;">(1) Sulfur content shall not exceed 15 parts per million (ppm); and</p> <p style="padding-left: 40px;">(2) Cetane index shall be a minimum of 40 <u>or</u> the aromatic content shall not exceed 35 percent by volume.</p> <p>(e) The permittee shall not discharge more than one six-minute average opacity greater than 20% during any 60-minute period from this unit. At no time shall the permittee discharge a six-minute average opacity of particulate emissions greater than 40% from this unit.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06(103); 40 CFR Part 63, Subpart ZZZZ</p> <p>ADEM Admin. Code r. 335-3-10-.03(87) and 40 CFR Part 60, Subpart IIII</p> <p>40 CFR §60.4205(b)</p> <p>40 CFR §60.4205(b)</p> <p>40 CFR §60.4205(b)</p> <p>40 CFR §60.4207</p> <p>ADEM Admin. Code r. 335-3-4-.01(1)</p>

Federally Enforceable Provisos	Regulations
<p><b>3. <u>Compliance and Performance Test Methods and Procedures</u></b></p> <p>The permittee shall operate and maintain the certified stationary CI internal combustion engines according to the manufacturer's emission-related written instructions and shall keep records of conducted maintenance to demonstrate compliance.</p> <p><b>4. <u>Emission Monitoring</u></b></p> <p>(a) The permittee shall install and operate a non-resettable hour meter on this unit.</p> <p>(b) The permittee shall not operate this unit except as provided in 40 CFR §60.4211(f)(1) through (f)(3), which include but may not be limited to:</p> <p>(1) Emergency situations;</p> <p>(2) A total of 100 hours per year or less for the purposes allowed by 40 CFR §60.4211(f)(2)(i) -(iii), which include maintenance checks and readiness testing, emergency demand response, and periods where deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency; and</p> <p>(3) A total of 50 hours per year or less for the non-emergency situations allowed by 40 CFR §60.4211(f)(3); however, those 50 hours are counted towards the 100 hours per year allowed for maintenance checks and readiness testing, emergency demand response, and voltage or frequency deviations of 5 percent or greater.</p> <p><b>5. <u>Recordkeeping and Reporting Requirements</u></b></p> <p>(a) The permittee shall keep the following records for this unit in accordance with 40 CFR §60.4214. At a minimum, these records shall include:</p> <p>(1) A copy of all notifications submitted to comply with 40 CFR Part 60, Subpart IIII and all documentation supporting any notification;</p> <p>(2) For each period of operation, the permittee shall record the date and 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. The permittee shall subtotal the total number of hours the engine was operated during a calendar year by the reason the engine was in operation;</p>	<p>40 CFR §60.4206</p> <p>40 CFR §60.4209</p> <p>40 CFR §60.4211(f)</p> <p>ADEM Admin Code r. 335-3-16-.05(c) and 40 CFR §60.4214</p>

Federally Enforceable Provisos	Regulations
<p>(3) Documentation from the manufacturer that the engine is certified to meet the applicable emission standards; and</p> <p>(4) The dates and nature of maintenance performed.</p> <p>(b) The permittee shall maintain records of the sulfur content <u>and</u> either the Cetane index or aromatic content of the diesel fuel that is burned in this unit.</p> <p>(c) The permittee shall keep each required record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall keep each record readily accessible in hard copy or electronic form on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records off site for the remaining 3 years.</p> <p>(d) 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 period (July 1<sup>st</sup>-December 31<sup>st</sup> and January 1<sup>st</sup>-June 30<sup>th</sup>). The report shall include a statement certifying all emission monitoring was conducted as required during the reporting period. If all emission monitoring was not conducted, the report shall explain the reason(s) why it was not performed.</p>	<p>ADEM Admin Code r. 335-3-16-.05(c) and 40 CFR §60.4214</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. 006 (Emergency Generator Engine)**

**Summary Page**

**Description:** 7.5 kw Generac Propane-fired Internal Combustion Emergency Engine (ENG2)

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

**Emission limitations:**

<b>Emission Point No.</b>	<b>Description</b>	<b>Pollutant</b>	<b>Emission limit</b>	<b>Regulation</b>
ENG2	7.5 kw Generac Emergency Generator	CO	610 g/KW-hr	40 CFR Part 60, Subpart JJJJ
		NMHC+NO <sub>x</sub>	8.00 g/KW-hr	§60.4231(a)
		SO <sub>2</sub>	N/A	N/A
		VOC	N/A	N/A
		HAP	N/A	40 CFR §63.6580

## Emission Unit No. 006 (Emergency Generator Engine)

### Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<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."	ADEM Admin. Code r. 335-3-16-.03
(b) This unit is an affected source under 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.	ADEM Admin. Code r. 335-3-11-.06(103); 40 CFR Part 63, Subpart ZZZZ
(c) This unit is subject to the applicable provisions of 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.	ADEM Admin. Code r. 335-3-10-.02(88) and 40 CFR Part 60, Subpart JJJJ
<b>2. <u>Emission Standards</u></b>	
(a) The permittee shall not cause or allow the sum of emissions of non-methane hydrocarbons (NMHC) and nitrogen oxides (NOx) to exceed 8.00 g/kW-hr from ENG2.	40 CFR §60.4231(a)
(b) The permittee shall not cause or allow the emissions of particulate matter (CO) to exceed 610 g/kW-hr from ENG2.	40 CFR §60.4231(a)
(c) The permittee shall not discharge more than one six-minute average opacity greater than 20% during any 60-minute period from these units. At no time shall the permittee discharge a six-minute average opacity of particulate emissions greater than 40% from this unit.	ADEM Admin. Code r. 335-3-4-.01(1)
<b>3. <u>Compliance and Performance Test Methods and Procedures</u></b>	
The permittee shall operate and maintain the certified stationary SI internal combustion engines according to the manufacturer's emission-related written instructions and shall keep records of conducted maintenance to demonstrate compliance.	40 CFR §60.4234
<b>4. <u>Emission Monitoring</u></b>	
(a) The permittee shall install and operate a non-resettable hour meter on these units.	40 CFR §60.4237(c)
(b) The permittee shall not operate this unit except as provided in 40 CFR §60.4243 (d)(1) through (3), which include but may not be limited to:	40 CFR §60.4243 (d)(1)-(3)



Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> <li>(1) There is no time limit on the use of the emergency stationary ICE in emergency situations;</li> <li>(2) A total of 100 hours per year or less for the purposes allowed by 40 CFR §60.4243, which include maintenance checks and readiness testing, emergency demand response, and periods where deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency; and</li> <li>(3) A total of 50 hours per year or less for the non-emergency situations allowed by 40 CFR §60.4243; however, those 50 hours are counted towards the 100 hours per year allowed for maintenance checks and readiness testing, emergency demand response, and voltage or frequency deviations of 5 percent or greater.</li> </ul>	
<b>5. <u>Recordkeeping and Reporting Requirements</u></b>	
<ul style="list-style-type: none"> <li>(a) The permittee shall keep the following records for this unit in accordance with 40 CFR §60.4245. At a minimum, these records shall include: <ul style="list-style-type: none"> <li>(1) A copy of all notifications submitted to comply with 40 CFR Part 60, Subpart JJJJ and all documentation supporting any notification;</li> <li>(2) For each period of operation, the permittee shall record the date and 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. The permittee shall subtotal the total number of hours the engine was operated during a calendar year by the reason the engine was in operation;</li> <li>(3) Documentation from the manufacturer that the engine is certified to meet the applicable emission standards; and</li> <li>(4) The dates and nature of maintenance performed.</li> </ul> </li> </ul>	ADEM Admin Code r. 335-3-16-.05(c) and 40 CFR §60.4245
<ul style="list-style-type: none"> <li>(b) The permittee shall keep each required record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall keep each record readily accessible in hard copy or electronic form on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records off site for the remaining 3 years.</li> </ul>	ADEM Admin Code r. 335-3-16-.05(c)

Federally Enforceable Provisos	Regulations
<p>(c) The permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21(a), no later than 60 days after the end of each semiannual period (July 1<sup>st</sup>-December 31<sup>st</sup> and January 1<sup>st</sup>-June 30<sup>th</sup>). The report shall include a statement certifying all emission monitoring was conducted as required during the reporting period. If all emission monitoring was not conducted, the report shall explain the reason(s) why it was not performed.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

### Provisos for Facility-Wide Fugitive Dust Plan

Federally Enforceable Provisos	Regulations
<p><b>1. <u>Applicability</u></b></p> <p>This unit 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 No. 18 to prevent fugitive dust at the facility which travels 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, considering factors such as naturally wet conditions, visual observations for fugitive dust in areas listed with potential to generate fugitive dust, and if visible emissions traveling beyond the facility property line are observed, any necessary corrective actions shall be initiated within four (4) hours of observation.</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(a). This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.</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 Management Plan**

# FUGITIVE DUST PLAN

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## PURPOSE

Two Rivers Lumber Co. LLC (Two Rivers) will take all reasonable precautions to prevent fugitive dust emissions from the facility. This plan is developed to document the measures utilized on-site to reduce fugitive dust. It is provided to satisfy the requirements of the Alabama Department of Environmental Management (ADEM) associated with the renewal of Two Rivers' Major Source Operating Permit (MSOP) No. 105-S007.

## SCOPE

"Fugitive dust", as used in this document, refers to particulate matter that enters the atmosphere without first passing through a stack or duct designed to direct or control its flow. Fugitive dust from facilities such as Two Rivers can be generated by activities, including vehicular movement, handling or storing raw materials and products, and processing materials in open areas. The scope of this plan addresses the entire Two Rivers mill, from raw material receiving to mill operations and the shipping of finished products.

## FUGITIVE DUST SOURCES

Roads: Two Rivers roadways can generate fugitive dust. These are haul roads for raw materials, finished products, and byproducts. Most roads on site are paved, and others are surfaced to minimize dust generation. Limited access to the facility and posted speed limits serve safety purposes and help control dust.

Green Lumber Area: Logs are brought on-site by truck and stored in the log yard. The logs are debarked with the enclosed Debarker and processed through the enclosed Sawmill. Any piles from processing or cleanup are handled and stored in a manner that hinders the material from becoming airborne. Any green wood byproducts are managed as valuable byproducts.

Lumber Finishing: Dust collection from the enclosed Planer Mill is necessary as shavings are a valuable byproduct. The collection system should be maintained to ensure normal operation to minimize fugitive dust escape and buildup.

Residual Handling: Material transferred offsite is contained within an enclosed conveyance to prevent it from becoming airborne and minimize material loss and dust generation.

### **FUGITIVE DUST MINIMIZATION PROCEDURES**

Two Rivers' precautions to minimize fugitive dust include best practices for dust control measures. Such precautions include the following options, as needed, to minimize fugitive dust and ensure compliance with opacity limits included in MSOP No. 105-S007 and ADEM rules.

- Maintain surfaces of roads, parking areas, and yards
- Apply water or other dust suppressants to surface areas if necessary
- Clean surfaces and tires of vehicles to prevent out-tracking
- Limit vehicle access and speed
- Perform routine maintenance and cleaning of process equipment
- Enclose or cover conveyor systems
- Ensure good housekeeping practices to include routine cleanup of areas, minimization of debris build-up, and quick response to address any spillage of possibly dusty material
- Implement operational measures to reduce dust to include building enclosures and covered conveyance
- Personnel are trained on the housekeeping requirements for the facility
- Routine walkthroughs each operating day identify any area requiring attention

These options will be employed when necessary to minimize fugitive dust.

### **RESPONSIBILITY**

The Mill Manager is ultimately responsible for the housekeeping, maintenance, and operations that effectively control fugitive dust. Supervisors will ensure their areas are properly maintained through preventive maintenance and adequately cleaned through sufficient housekeeping. The EHS Manager is responsible for training personnel on the content of the Fugitive Dust Plan and updating this plan on an as-needed basis. All Two Rivers employees are expected to maintain a clean work environment and report any environmental issues, including excess fugitive dust, to supervision.

### **REPORTING**

Any fugitive dust emissions from the site that violate a permit condition or ADEM rule or regulation should be reported through procedures required by Two Rivers' MSOP.

### **REVISIONS**

Revision No.	Revision Date	Revised Section	Notes
0	March 12, 2025		Initial development of Plan