

**Statement of Basis
Abbeville Fiber, LLC
Abbeville, Henry County, Alabama
Facility/Permit No. 606-S008**

This draft Title V Major Source Operating Permit (MSOP) is issued under the provisions of ADEM Admin. Code chap. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

An Air Permit for original construction of the site was issued on July 5, 2018. The application for this renewal was received on May 19, 2025. Addenda to the application were received on March 16, 2026, and May 6, 2026. The initial MSOP was issued on November 24, 2020, and this is the 1st renewal. The current MSOP, which became effective on November 24, 2020, expired on November 23, 2025.

The following modifications have been made to the current MSOP since its issuance:

February 11, 2021: Administrative Amendment to remove 223 BHP, Emergency Fire Water Pump Engine (EU 004) from the Title V MSOP as it was no longer in service.

March 21, 2022: Significant Modification to incorporate CDK-2 (Air Permit X006) into the Title V MSOP.

The facility is located in Henry County, which is currently listed as attainment/unclassifiable with all National Ambient Air Quality Standards (NAAQS). There are no current or ongoing enforcement actions against Abbeville Fiber necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov> (Search using Facility ID AL000000010670S008).

Permit History

Issuance No./ Permit No.	Issuance Date	Limit(s) Established	Limit(s) Basis/ Reasoning
Air Permit X003	July 5, 2018	Planer Mill w/Cyclone and Shavings Storage Bin: PM (Including PM ₁₀ and PM _{2.5}) 0.42 lb/hr	SMS Limit
Air Permit X005	February 18, 2020	55,000 MBF/yr Continuous Lumber Dry Kiln (CDK-1) with a 27 MMBtu/hr Wood-Fired Burner and 18 MMBtu/hr Natural Gas Burner*: PM (Including PM ₁₀ and PM _{2.5}) 1.31 lb/hr VOC 4.8 lb/MBF (WPP1) Facility lumber production limit of 104 MMBF/yr	PSD SMS Limit
Air Permit X006	February 18, 2020	55,000 MBF/yr Continuous Lumber Dry Kiln (CDK-2) with an 18 MMBtu/hr Natural Gas Burner: VOC 4.8 lb/MBF (WPP1) Facility lumber production limit of 104 MMBF/yr	PSD SMS Limit
Air Permit X007	April 23, 2026	Planer Mill w/Cyclone: Remove 0.42 lb/hr PM limit	Limit determined to be unnecessary

*Natural gas burner was never installed

Facility Operations

Abbeville Fiber (AF) produces southern pine dimensional lumber. The significant sources of air pollutants at this facility are a debarker, bark hog with storage bin, chipper with storage bin, sawmill, two (2) sawdust storage bins, a 55 MMBF/yr continuous lumber drying kiln (CDK-1) with a 27 MMBtu/hr wood-fired burner, a 55,000 MBF/yr Continuous Lumber Dry Kiln (CDK-2) with 18 MMBtu/hr Natural Gas Burner, and a planer mill with cyclone and shavings storage bin. Insignificant sources of emissions are fueling of rolling stock, a parts washer, and welding.

Incoming logs are stored on-site prior to processing. The logs are debarked and cut to length before being processed into dimensional lumber in the sawmill. The bark is routed to a hog and then to a bark bin. Scrap wood from the sawmill is sent to a chipper/screen then stored in a chip bin or on a chip pad. The bark and chips are shipped off site. Sawdust is collected in a sawdust bin and utilized in CDK-1 as fuel or sold. All sawmill conveyance systems are mechanical and considered fugitive sources.

After being sorted and stacked, the lumber is dried in the continuous dry kilns. As the green lumber enters the continuous kiln, it is slowly heated until it reaches the center of the kilns, where most of the drying takes place. CDK-1 is direct-fired by a wood-fired burner and CDK-2 is fired by a natural gas burner. Fuel for CDK-1 consists of sawdust generated in the sawmill. All air emissions exhaust through the open doorways at each end of the kilns and through exhaust stacks located just inside and above the doorway openings.

After being dried, the lumber is transported to the planer mill to be cut to finished size. The lumber is then graded, trimmed, sorted and stacked. Shavings from the planer mill are pneumatically conveyed to a cyclone and storage bin to be shipped off site. Finally, the lumber is forklifted to a warehouse to be shipped out.

Proposed Changes

Changes from the existing Title V MSOP would include removing the particulate emission limit (0.42 lb/hr) for the planer mill (EU 003). At the time of construction, the facility voluntarily requested this limit in lieu of the state regulatory allowable (10.1 lb/hr) as determined by process weight (ADEM Admin. Code r. 334-3-4-.04(1)). An application was received from AF on March 3, 2026, requesting the limit be removed as it was voluntarily requested and unnecessary. Air Permit X007 was issued to the facility on April 23, 2026, reflecting the removal of the limit. The conditions of Air Permit X007 would be incorporated into the MSOP as part of the permit renewal.

Federal Regulations

Title V

This facility is considered a major source under Title V regulations as the potential emissions of volatile organic compounds (248.72 TPY of VOC) exceed the 100 ton per year (TPY) major source threshold. It is a major source of hazardous air pollutants (HAPs) as the potential emissions of any single HAP (methanol) are greater than 10 TPY. The potential emissions for combined HAP are less than 25 TPY.

PSD

The facility is located in Henry County which is currently classified as an attainment area for all criteria pollutants. AF is not one of the 28 Major Source categories listed in ADEM Admin. Code r. 335-3-14-.04(2)(a)(1); therefore, the major source threshold of concern is 250 TPY for criteria pollutants. When CDK-2 was installed, the facility requested a synthetic minor VOC emission limit (4.8 lb/MBF) and a production limit (104 MMBF/yr) to ensure the project would not trigger PSD applicability. Based upon these limits, the facility is considered a synthetic minor source for PSD.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The National Emission Standards for Hazardous Air Pollutants requires that any facility regulated under section 112 of the Clean Air Act whose potential emission of hazardous air pollutants (HAPs) exceeds the major source threshold, unless the source is a specifically designated area source, must control these emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions under 40 CFR Part 63. AF is a major source for HAPs and an affected source under 40 CFR Part 63, Subpart DDDD, NESHAP: *Plywood and Composite Wood Products (PWCP MACT)*.

The PCWP MACT regulates HAP emissions from activities associated with the manufacture of plywood and other composite wood products, including stand-alone lumber kilns, in accordance with 40 CFR §63.2232. Processes that are not subject to the compliance options or work practice requirements specified in 40 CFR §63.2240, such as the lumber kilns, are specifically not required to comply with the compliance options, work practice requirements, performance testing, monitoring, startup/shutdown/maintenance (SSM) plans, and recordkeeping or reporting requirements of the subpart, or any other requirements in 40 CFR 63 Subpart A, except the initial notification requirements in 40 CFR §63.9(b) in accordance with 40 CFR §63.2252. The applications for construction of the kilns served as the initial notifications of the affected sources under the PCWP MACT.

New Source Performance Standards (NSPS)

None of the processes at the facility are affected sources under NSPS.

State Regulations

Particulate Standards

Fuel Burning Equipment

The CDK burners are not subject to ADEM Admin. Code r. 335-3-4-.03(1), because the kilns are direct fired, and therefore, not considered “fuel burning equipment”. There are no additional combustion sources at the facility.

Process Industries – General

All units and processes at the facility are subject to the State particulate matter emission standards for process industries as provided in ADEM Admin. Code r. 334-3-4-.04(1).

Visible Emissions

All units and processes are subject to the State visible emission standards of ADEM Admin. Code r. 335-3-4-.01(1), which states that no air emission source may emit particulate of an opacity greater than 20% (as measured by a six-minute average) more than once during any 60-minute period and at no time shall emit particulate of an opacity greater than 40% (as measured by a six-minute average).

Sulfur Dioxide

The CDK burners are not subject to the State sulfur dioxide emission standards as the units are direct-fired.

Fugitive Dust and Fugitive Emissions

ADEM Admin. Code r. 335-3-4-.02 requires that precautions be taken to prevent particulate matter from becoming airborne. This rule is applicable to Abbeville Fiber. The facility submitted a fugitive dust plan as part of the renewal application. The dust plan will be included in Appendix A of the permit.

Emission Testing and Monitoring

Dry Kilns

Testing

The US EPA recently documented the difficulty of stack testing kilns in their documentation of proposed PCWP MACT amendments. EPA stated within EPA PCWP MACT Proposed Rule Prepublication Copy for Federal Register Notice 5/5/23:

"For CDKs, direct measurement of total kiln exhaust flow is not technically feasible due to the significant volume of fugitive emissions from the kiln openings. In addition to being unable to measure total flow, many CDKs have no specific emission point (or conduit) in which to measure emissions concentration (*e.g.*, no outlet stack or hood, or in an indirect-fired kiln no kiln air return duct to a burner). This lack of a specific emission point for measurement of total kiln air flow and concentration is also an economic limitation, because even if outlet vents suitable for testing were present for a portion of exhaust, all such vents would need to be tested to ensure uniformity of concentration or to establish vent-specific concentrations, which would greatly increase source testing costs (while total flow would continue to remain uncertain, limiting usefulness of the data for prescribing or enforcing an emission standard)."

Based upon these findings, testing would not be required for the dry kilns to demonstrate compliance with emission limits.

Periodic Monitoring

To ensure that the lumber production limit for the kilns (104 MMBF/yr) is not exceeded, AF is required to calculate the kiln production on a monthly and 12-month rolling total basis. AF is also required to document that the facility is adhering to its maintenance plan for the kilns.

Planer Mill

Testing

I recommend that no emission testing be required for the planer mill because calculations indicate that it should be capable of complying with the applicable standards. If emission problems are observed in the future, testing may be required at that time.

Periodic Monitoring

To ensure proper operation of the planer mill, visual observations are required on a weekly basis, with corrective actions to be initiated as soon as practicable but not longer than 24 hours if greater than expected visible emissions are noted from the cyclone. Annual physical inspections of the cyclone are also required. Since cyclones on wood waste pneumatic systems are considered process equipment, CAM would not be required for the planer mill.

Recordkeeping and Reporting

Recordkeeping

AF is required to maintain records of its actions taken to comply with proper maintenance and operating practices. Records of weekly visual observations of the cyclone are also required, as well as records of monthly and 12-month rolling lumber production. These records are maintained on-site in a permanent form readily available for inspection.

Reporting

AF is required to submit Semiannual Monitoring Reports for the processes, which include a certification that all emission monitoring and proper maintenance and operating practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished.

Coastal Consistency

This facility is not located within the 10-foot contour range of Mobile and Baldwin Counties.

Public Notice

The issuance of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

I recommend that Abbeville Fiber's Title V MSOP be renewed with the requirements noted above pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review.



Lester Meredith
Chemical Branch
Air Division

May 18, 2026
Date

VLM/vlm