

PRELIMINARY DETERMINATION
Westervelt Lumber-Thomasville L.L.C.
Thomasville Mill
Facility No. 102-S014

Introduction

On May 07, 2026, Trinity Consultants submitted, on behalf of The Westervelt Company, Inc. (Westervelt Thomasville), a Prevention of Significant Deterioration (PSD) permit application. In the application, Westervelt Thomasville proposes to add a new sawmill and kiln at the existing lumber mill site located in Clarke County, near Thomasville, Alabama. An initial application was received on May 7, 2026, and requested supporting documentation was received on June 1, 2026, and August 3, 2026. Once construction is complete, the facility will have the capability of producing an additional 116,800 MBF/yr of dimensional softwood lumber, increasing the total dried lumber production at the facility to 467,200 MBF/yr. Air Permit Nos. X005 and X006 would be issued for the proposed Kiln No. 4 and Sawmill No. 2, respectively, pending the resolution of any comments that may be received during the public comment period and EPA review.

Current Facility Description

The Thomasville Mill facility produces planed lumber from logs. Processes at the facility consist of log preparation and debarking, sawmill, sawmill chipper, materials transfer to truck loadout bins, three (3) 116.8 MMBF/yr continuous lumber dry kilns (CDK-1, CDK-2, CDK-3) each with a 45 MMBtu/hr natural gas-fired burner, planer mill with cyclofilter baghouse, four (4) diesel-fired emergency generator engines, and a diesel-fired emergency fire pump engine.

Incoming logs are stored on-site prior to processing. Logs are cut to desired length and debarked before being routed through the sawmill. Bark from the debarker is sold off-site as a by-product. Logs entering the sawmill are converted into various sizes of green timber or dimensional lumber to be sold as is or dried in the lumber kilns. Trimmings and defect pieces from the sawmill are chipped and sold as by-products. Emissions from the green end processes, sawmill, and the residuals storage bins are considered fugitive in nature.

Packs of green lumber from the sawmill are stacked onto carts for one of the three lumber drying kilns. The current dry kilns are direct-fired continuous kilns each with the capacity to produce 116.8 million board feet per year (MMBF/yr) dried lumber and each are equipped with a 45 MMBtu/hr direct-fired natural gas burner.

Each current dry kiln (3) is known as counter-flow, direct-fired Kilns, with the capacity to produce 116.8 million board feet per year (MMBF/yr) dried lumber. Each kiln is equipped with a 45 MMBtu/hr direct-fired natural gas burner. Lumber is moved in and out on dual tracks in opposite directions. The hot, dry, exiting lumber warms up the cool, wet, entering lumber.

As wet wood slowly enters the kiln, it is warmed up by waste heat and steam coming from the drying process. The wood moves into the center zone, where intense heat and heavy airflow rapidly extract moisture to dry the timber to exact specifications. As the dried lumber moves past

the center area, the incoming green lumber is preheated and conditioned by warm and dry air passing through the opposing dry lumber. Finally, the wood slowly passes through the exit, cooling down while releasing controlled moisture so the wood does not crack or warp. By continuously recycling the heat from cooling wood to preheat new wood, the current kilns avoid the thermal spikes and wasted energy associated with traditional batch kilns.

The dried lumber is processed through the planer mill to the desired final thickness, width, and length. Trim blocks convey lumber to the trim block hog, and hogged shavings and other fines are pneumatically conveyed to the planer mill's Cyclofilter. Finished lumber is then stored for shipment by truck.

Proposed Project

The proposed project includes the following:

- Installation of a continuous direct-fired kiln with a new natural gas-fired burner, CDK 4 (X005).
- Installation of a new sawmill, Sawmill No. 2 (X006).

Westervelt Thomasville proposes constructing and operating a new sawmill, Sawmill No. 2 (Air Permit (X006) as well as a new 116.8 MBF continuous direct-fired kiln (CDK 4) equipped with a 45 MMBtu/hr natural gas-fired burner (Air Permit No. X005).

Logs would continue to be processed through the existing log debarker (FD01) and chipper (FC01) before being conveyed to the sawmills. Sawmill No. 2 would operate in parallel with existing Sawmill No. 1 as part of the overall process flow. No physical modifications to existing units are proposed as part of this project.

The proposed CDK4 and its associated natural gas-fired burner would be identical to the existing kilns currently permitted at this facility. The addition of Sawmill No. 2 and CDK 4 would increase the facility's overall lumber capacity and the volume of board feet processed through the planer mill. As a result, throughput increases are also expected for supporting operations, including byproduct generation from the debarker and chipper, material handling and transfer activities and planer mill operations.

Westervelt Thomasville would retain the existing Synthetic Minor Source (SMS) TSP limits, as well as the PM₁₀ and PM_{2.5} BACT limits, for all affected supporting operations.

Applicability: Federal Regulations

Title V

This facility is considered a major source under Title V regulations because potential emissions for volatile organic compounds (VOC) exceed the 100 tons per year (TPY) major source threshold (934.6 TPY). The facility is considered a major source for Hazardous Air Pollutants (HAP) because the potential emissions of methanol (37.6 tpy) exceed the 10 TPY major source

threshold and the potential emissions of combined HAP (62.6 tpy) exceed the 25 TPY major source threshold.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

NESHAP requires that any facility whose potential emission of hazardous air pollutants (HAPs) exceed 10 TPY of a single hazardous air pollutant (HAP) or 25 of combined HAPs must control these emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. The NESHAP standards are established for source categories and prescribed based on whether the source is “existing” or “new”. This facility would be considered a “new” source.

40 CFR Part 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (PWCP MACT)

The facility is a major source for Hazardous Air Pollutants (HAPs) and an affected source under NESHAP Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: PCWP MACT. The PCWP MACT regulates HAP emissions from activities associated with the manufacture of plywood and other composite wood products and includes lumber kilns located at PCWP manufacturing facilities. The U.S. Environmental Protection Agency (EPA) finalized amendments to the PCWP MACT that became effective July 6, 2026.

The proposed 116.8 MMBF Continuous Direct-fired kiln (Kiln No. 4) is considered an affected source under the PCWP MACT because it is a lumber kiln located at a PCWP manufacturing facility that is a major source for HAPs. The proposed kiln would commence construction after May 18, 2023, and is subject to the applicable requirements for affected sources that commenced construction after May 18, 2023. In accordance with 40 CFR §63.2233(e)(1), the applicable compliance options and operating requirements apply as of July 6, 2026, or upon initial startup, whichever is later.

The requirements specific to lumber kilns include the applicable general requirements in 40 CFR §63.2253 and work practice requirements in 40 CFR §63.2241. These requirements include provisions addressing lumber kiln operation, burner tune-ups, and work practices to minimize over drying of lumber. The applicable monitoring, operation, maintenance and continuous compliance demonstration requirements are specified in 40 CFR §63.2269, 40 CFR §63.2270 and 40 CFR 63.2271.

The natural gas burner used to direct-fire Kiln No. 4 is not equipped with a bypass stack, and the exhaust from the natural gas burner cannot be vented to the atmosphere without first passing through the lumber kiln. The definition listed in 40 CFR §63.2292 defines a combustion unit bypass stack as a bypass or abort stack through which a combustion unit’s exhaust stream routinely used to direct-fire a lumber kiln is vented to the atmosphere without first passing through a lumber kiln. Kiln No. 4 does not have a combustion unit bypass stack. The combustion unit bypass stack monitoring requirements in 40 CFR §63.2269(k) and the bypass stack usage reporting requirement in 40 CFR §63.2281(c)(10) do not apply to Kiln No. 4

The proposed kiln is also subject to the notification requirements listed in 40 CFR §63.2280(a), (b) and (g)(3). The Permittee shall submit the required initial notification in accordance with 40 CFR §63.2280(a) and (b). The construction application may satisfy the initial notification requirement if it contains all information required by the applicable provisions of 40 CFR §63.2280(a) and (b). Additionally, the Permittee is required to submit a Notification of Compliance Status no later than 30 days following the completion of each initial compliance demonstration in accordance with 40 CFR §63.2280(d)(1).

New Source Performance Standards (NSPS)

No applicable NSPS has been promulgated for the proposed project at this facility.

Prevention of Significant Deterioration (PSD)

This facility is located in Clarke County which is currently classified as an attainment area for all criteria pollutants. Westervelt Thomasville is not one of the 28 Major Source categories listed in ADEM Admin Code r. 335-3-14-.04(2)(a)1; therefore, the applicable PSD criteria pollutant major source threshold is 250 TPY. The facility is currently a major PSD source; therefore, emissions from this proposed project would be compared to the PSD Significant Emission Rates (SERs) to determine if the project is a major modification and would need to undergo PSD review.

The facility initially underwent PSD review during the permitting of current operations in November 2019. VOC emissions resulting from the proposed CDK 4 would exceed the pollutant specific significance emission rate (SER) of 40 TPY (233.6 TPY of VOC), therefore triggering PSD review for VOC emissions.

Pre-emissions	Current TPY	Post Project Emissions TPY (Includes Fugitive Emissions)
Filterable PM	24.34	37.9
Total PM ₁₀	19.87	28.3
Total PM _{2.5}	10.59	14.1
NO _x	29.49	39.15
CO	49.1	65.4
VOC	701.0	934.6
SO ₂	0.35	0.47
CO _{2e}	69,328	92,408
Total HAP	47.0	62.6
Max Individual HAP	28.2	37.6

Emissions Summary (TPY)

Proposed Potential Emission Units	PM (Filterable)	PM₁₀	PM_{2.5}	NO_x	CO	VOC	SO₂
Kiln No. 4 Gas Burner	0.37	1.47	1.47	9.66	16.23		0.12
Continuous Kiln No. 4	0.76	1.28	1.28			233.6	
Planer Mill Baghouse (Associated Increases)	1.34	1.34	0.48				
<i>Fugitive Emission Sources</i>							

Log Preparation							
Sawmill No. 2	3.52	1.27	0.39				
Debarking	1.52	0.84	0.01				
Chipper	1.52	0.84	0.01				
Material Transfer	1.49	0.70	0.10				
Road Travel	0.32	0.06	0.02				
Total Proposed Emissions (TPY)	10.84	7.80	3.76	9.66	16.23	233.6	0.12
PSD Significant Emission Rate (TPY)	25	15	10	40	100	40	40
PSD Triggered?	No	No	No	No	No	Yes	No

Sources subject to PSD must satisfy the following requirements before being allowed to initiate construction:

1. Provide opportunity for public participation in the permitting process relative to the air quality impact the source would have if it were built.
2. Obtain a permit which sets forth emission limitations.
3. Demonstrate that the emissions from the source would not cause or contribute to a violation of the PSD increment or the NAAQS.
4. Apply the best available control technology (BACT), which is defined in terms of an emission limitation, based on the maximum degree of reduction of each pollutant which is determined to be technically and economically achievable for that particular source.
5. Analyze the impairment to visibility, soils, and vegetation that might occur as a result of operation of the source.
6. Analyze the air quality impacts projected due to the growth associated with the facility.
7. Conduct any ambient air quality monitoring necessary to determine the effect of the emissions on air quality.

Public Participation

To satisfy the public participation requirement, a copy of the preliminary determination (this engineering analysis) and the permit applications provided on the ADEM website for at least 30 days of public review. After the 30-day public comment period and within 5 days of the PSD permit issuance, the final determination will be made available on the ADEM website. The final determination consists of copies of the signed permits, any comments received during the public comment period, and any responses made to those comments.

BACT Determination

During a PSD review, new and modified sources must be assessed for Best Available Control Technology, or BACT, if their potential emissions increase is significant. BACT is an emission limit based on the maximum pollutant reduction achievable considering energy, economic, and environmental impacts. BACT is determined on a unit by unit, pollutant by pollutant basis. The BACT limit can be no less stringent than any applicable New Source Performance Standard

(NSPS), National Emission Standard for Hazardous Air Pollutants (NESHAP), or other applicable standard.

For the proposed project, BACT must be determined for VOC emissions from the continuous lumber drying kiln. Westervelt Thomasville utilized the “top-down” approach for the BACT analysis. This approach considers the most stringent control option available and determines its technical feasibility for the emission unit in question. If the option is not rejected, the applicant must analyze the option based upon economic, environmental, and energy considerations. Below are the five basic steps of a top-down BACT review procedure as identified by the US EPA in March 15, 1990, Draft BACT Guidelines:

- Step 1. Identify all control technologies
- Step 2. Eliminate technically infeasible options
- Step 3. Rank remaining control technologies by control effectiveness
- Step 4. Evaluate most effective controls and document results
- Step 5. Select BACT

TABLE I
AVAILABLE CONTROL TECHNOLOGIES

Pollutant	Control Technology
VOC	Adsorption, Biofiltration, Condensation, Thermal Oxidation, Wet Scrubbing, Proper Maintenance and Operating Practices

The facility offers the following emission levels as BACT:

Table II

Emission Unit	Pollutant	Selected BACT	Emission Operating Limit
Continuous Kiln	VOC	Proper Maintenance and Operating Practices	4.0 lb/MBF as WPP1

BACT determination for VOC

Step 1. Identify all control technologies:

Westervelt Thomasville examined the feasibility of the following control technologies: adsorption, biofiltration, condensation, thermal oxidation, wet scrubbing, and proper maintenance and operating practices.

Adsorption

Regenerative adsorption systems are typically batch operations involving two or more fixed adsorption beds. The VOC-laden gases pass through the adsorption bed where the VOC molecules are physically bound to the pore space in the adsorbent by Van der Waals nuclear forces. The cleaned gas is discharged to the atmosphere. The batch nature of the adsorption process concludes when the adsorbent bed becomes saturated with VOC

and must be regenerated. Regeneration of the adsorbent is commonly done using thermal swing or vacuum process. Thermal swing regeneration utilizes steam to displace the captured VOC molecules. Then the VOC-laden steam must be treated separately. Vacuum regeneration utilizes lowering of the vapor pressure to remove the VOC molecules from the adsorbent. The typical VOC inlet concentration required for effective adsorption falls in the range of 400 to 2,000 ppmv, and adsorbers and their follow-up control devices (i.e. condenser or decanter) are typically capable of achieving VOC control efficiencies greater than 95 percent.

Biofiltration

Biofiltration is an air pollution control technology in which off-gases containing biodegradable organic compounds are vented, under controlled temperature and humidity, through a biologically active material. As an air stream passes through the biofilter, the contaminants in the air stream partition from the gaseous phase to the liquid phase of the biofilter. Once contaminants pass into the liquid phase, they become available for the complex oxidation process by the microorganisms inhabiting the biofilter.

Condensation

Condensers operate by lowering the temperature of the exhaust gas streams containing condensable VOC to a temperature at which the target VOC's vapor pressure is lower than its entering partial pressure. Cooling the exhaust stream to a temperature below the saturation point removes the latent heat from the exhaust and allows the VOC to condense on the surface of the condenser tubes for collection and recycle to the process or disposal. Condensers are most effective in single component systems involving emission streams with a high percentage of a condensable VOC, because less heat must be removed from the exhaust gas to reduce the sensible heat of non-condensable gases and the required condenser temperature to achieve high levels of recovery. Since the control efficiency of a condenser is dynamic based on the outlet temperature and inlet concentration of VOC in the exhaust stream, condensers exhibit a wide range of VOC control efficiency from as low as 50 percent to as high as 99 percent.

Thermal Oxidation

A thermal oxidizer supplies sufficient combustion air and supplemental fuel at a suitable temperature to allow for oxidation of VOC and other combustible compounds present in the exhaust stream within the combustion chamber. Oxidizers are categorized by either a thermal or catalytic design and can be further subdivided into units with and without exhaust gas heat recovery. Regenerative Thermal Oxidation (RTO) utilizes beds of high-density packed heat transfer media to recover and store heat and typically operate at a final oxidation temperature between 1400°F and 2000°F. Catalytic thermal oxidation utilizes a catalyst bed (usually a noble metal), where combustible compounds can be oxidized at a fast rate and a lower temperature range (600°F to 1000°F). The exhaust gases from the combustion chamber are used to heat another media bed, periodically reversing the air flow to preheat the VOC-laden gas stream. Depending on the system requirements and the characteristics of the contaminated stream, an RTO is able to achieve VOC removal efficiency ranges from 95 to 99%, with lower control efficiencies associated with lower concentration flows.

Wet Scrubbing

Scrubbing of gas or vapor pollutants from a gas stream is usually accomplished in a packed column (or other type of column) where pollutants are absorbed by counter-current flow of a scrubbing liquid. A VOC laden gas stream with relatively high-water solubility is required in order for the wet scrubber to be effective.

Proper Maintenance and Operating Practices

VOC emissions can be reduced through proper maintenance and operating practices of the proposed lumber drying kiln. The manufacturer's recommendations should be used when determining the appropriate operating specifications and developing a schedule for routine maintenance of the kiln. This method involves no add-on pollution controls.

Step 2. Eliminate technically infeasible options:

Adsorption

Adsorption is not practical because of the high moisture content of the exhaust stream from the lumber drying kiln. At high moisture contents, the water vapor and VOC compounds would compete with each other for the adsorption media's active sites; therefore, greatly reducing the capture efficiency of the control device. Therefore, this control technology would not be a feasible means of VOC control. ADEM concurs with this determination.

Biofiltration

Most microorganisms used in biofiltration typically can survive and flourish in a temperature range less than 105°F; however, the temperature of the exhaust streams of the kiln would be approximately 145°F. Furthermore, the primary VOC in the exhaust stream is terpenes, which are highly viscous and would easily foul the biofilter media. Because of the nature of the long-chained hydrocarbons in the exhaust stream, a biofilter with a reasonable footprint/retention time, would have a reduced control efficiency relative to a unit treating streams with large concentrations of methanol or formaldehyde. Westervelt Thomasville has determined that biofiltration is a technically infeasible option. ADEM concurs with this determination.

Condensation

Condensation requires that the exhaust stream be cooled to a low enough temperature for the vapor pressure to be lower than the VOC concentration. The VOC in the kilns' exhaust stream is primarily terpenes; therefore, the temperature at which these compounds would start to become liquid is -40°F. At that temperature, the water vapor in the exhaust stream would freeze, which would clog the unit. Therefore, this control technology would not be a feasible means of VOC control. ADEM concurs with this determination.

Thermal Oxidation

The high moisture content and low exit temperature in the exhaust streams would make an RTO technically infeasible. While regenerative catalytic oxidizers can operate at lower temperatures than the RTO, the exit temperature of the exhaust stream from the kiln is too low for this option to be feasible. These conditions can adversely affect the

RTO's performance and require substantial fuel to maintain operating temperatures required for efficient VOC destruction.

Additionally, the operation of an RTO would result in an increase in natural gas consumption and increase emissions of related pollutants including NO_x from natural gas combustion. Furthermore, particulate matter and other contaminants in the exhaust stream would cause a loss of catalytic activity.

Wet Scrubbing

While some VOCs that will be present in the exhaust stream are highly soluble in water, other VOCs, most notably α -pinene, are only very slightly soluble in water due to the lower Henry's Law constant as described in Perry's Chemical Engineer's Handbook. Lower Henry's Law constant VOCs would require much longer residence time within a scrubber packed column and would eliminate this as a technically viable solution for the constant stream that would need to be handled by a continuous kiln. Westervelt Thomasville has determined that wet scrubbing is a technically infeasible option. ADEM concurs with this determination.

Proper Maintenance and Operating Practices

Proper maintenance and operating practices are a technically feasible option for minimizing VOC emissions from the kiln and is considered further in the BACT determination.

Step 3 Rank remaining control technologies by control effectiveness:

Rank	Control Technology	Potential Control Efficiency
1	Proper Maintenance and Operating Practices	Base Case

Step 4. Evaluate most effective controls and document results:

Proper Maintenance and Operating Practices

The only remaining technology is proper maintenance and operating practices of the kiln. Proper maintenance and operating practices can effectively minimize VOC formation and would be considered BACT for VOC for the proposed continuous kiln. ADEM concurs with this determination.

Step 5. Select BACT:

Westervelt Thomasville proposes the following emission level as BACT:

Pollutant	BACT Determination	BACT Emission Limit	Equivalent Emissions
VOC	Proper Maintenance and Operating Practices	4.0 lb/MBF VOC as WPP1 *	53.33 lb/hr (at max. cap. 116.8 MMBF/yr)

* VOC as WPP1: Total VOC = VOC as C $\times$ 1.133 + (1 – 0.65) Methanol + Formaldehyde

A search of EPA RACT/BACT/LAER Clearinghouse indicated that no facilities utilize add-on controls for lumber drying kiln, and the proposed VOC emission limit of 4.0 lb/MBF (VOC as WPP1) is similar to other BACT determinations for continuous kilns in the wood products industry. The Air Division concurs that the proposed proper maintenance and operating practices and an emission limit of 4.0 lb/MBF (VOC as WPP1) represent BACT for the proposed kiln.

The facility submitted an updated Work Practice and Preventative Maintenance Program (OMP) for the proposed kiln, which identifies the maintenance and operating practices that will be implemented to ensure proper kiln operating practices and minimize emissions. These practices would be incorporated into the permit as enforceable conditions. The updated kiln OMP includes the following practices:

CDK-4 Work Practice and Preventative Maintenance Plan- Westervelt Thomasville, LLC

1. Conduct daily routine maintenance: (Operator Rounds)
 - a. Clean debris from around kiln and pusher tracks.
 - b. Visually inspect the primary air fan, gas train, and gas burner.
 - c. Visually inspect and lubricate kiln cart pusher axle bearings as needed.
 - d. Lubricate kiln cart's wheels as needed.
2. Conduct weekly inspections of:
 - a. Fan drive systems.
 - b. Cart pusher hydraulic system oil level and hose connections.
3. Conduct monthly routine maintenance:
 - a. Grease pawl manifold on the kiln cart pusher.
 - b. Inspect kiln fan shafts and lubricate as needed.
 - c. Inspect and clean the primary air fan and inlet filters on the kiln burner.
4. Conduct quarterly inspections:
 - a. Inspect plenum hatches, cleaning, as necessary.
 - b. Inspect all applicable temperature monitoring system components for integrity and all electrical components for continuity, oxidation, and galvanic corrosion.
5. Conduct semiannual routine maintenance:
 - a. Inspect fan bearings and lubricate as needed.
 - b. Replace hydraulic filter on kiln cart pusher hydraulic system.
 - c. Inspect baffles and brushes.
 - d. Lubricate primary air fan electric motors on the kiln burner.
 - e. Validate the reading of each dry bulb temperature sensor.
6. Conduct annual routine maintenance:
 - a. Lubricate kiln fan electric motors as needed.
 - b. Lubricate kiln cart pusher hydraulic system electric motors.

- c. Lubricating kiln cart pusher hydraulic system electric motors
 - d. Lubricate kiln vent hinges and linkage as needed.
 - e. Inspect the natural gas train and gas burner system.
 - f. Kiln shutdown for internal cleaning.
7. Lumber moisture content will be maintained at greater than 6% to prevent over drying of lumber. The moisture content of finished lumber will be automatically measured in the grader infeed system. Moisture content below 6% will be recorded in the applicable data collection system. Records of average moisture content per production run will be maintained in the operating system software. Production runs with average moisture content below 6% will be reported to ADEM's Air Division in the Semiannual Monitoring Report for that reporting period.
8. At least annually, review the charge optimization practices used during the preceding year to reduce over drying lumber and revise the practices as necessary in accordance with 40 CFR 63.2253(3). The Permittee shall document the results of the review, and identify any corrective actions performed.
9. At least annually, conduct a tune-up of the combustion unit used to directly fire Kiln No. 4 in accordance with 40 CFR §63.2241(d) and the procedures specified in 40 CFR §63.2271(c).
10. Operate the kiln with a maximum dry bulb temperature limit of 245°F and continuously monitor and record the dry bulb temperature during the kiln drying cycle, at a minimum, at least 4 times per hour (i.e. every 15 minutes) in accordance with 40 CFR §63.2269(a)(b) and (m). Additionally, calculate the daily block dry bulb temperature from the recorded readings in accordance with CF 63.2270(h)(1), maintaining the dry bulb temperature below 245°F and following the parameters required in 40 CFR 63.2270(b), (c) and (f). Kiln temperatures exceeding 245°F will result in a kiln shutdown. Records of high temperature shutdown events are maintained in the system operating software. Should the unit shut down due to high temperature, ADEM will be notified within two working days of determining the exceedance occurred. All such events will be submitted to ADEM's Air Division in the Semiannual Monitoring Report for that reporting period and properly noted in the appropriate section of this process's SCR and ACC.
11. At least annually, conduct an inspection on Kiln No. 4 to verify the integrity of the air flow and heat distribution components, including but not limited to, baffles, fans, vents, heating coils, or temperature sensors in accordance with 40 CFR 63.2253(a)(1) through (3).
12. Maintain proper documentation of the tasks described above in the facility maintenance software system.

Modeling

Modeled Emission Rates for Precursors (MERPs) were addressed for Ozone. Emissions from the proposed Westervelt facility in Thomasville, AL are not expected to cause or contribute to a violation of a NAAQS or PSD Increment. A detailed discussion of the modeling analysis is included as Appendix A.

Additional Impacts

Additional impact analyses assess the impacts of air, ground, and water pollution on soils, vegetation, and visibility caused by any increase in emissions of any regulated pollutant resulting from the modification under review and from associated growth. The depth of the analysis depends on existing air quality, the quantity of emissions, and the sensitivity of local soils, vegetation, and visibility in the source's impact area. Westervelt Thomasville addressed the impacts of the proposed project with respect to growth, soils and vegetation, and visibility.

No sensitive aspects of the soil and vegetation surrounding the facility have been identified. Since the proposed ambient concentrations of the criteria pollutants after completion of this project would be expected to be below the NAAQS and Class II increment (see Air Quality Dispersion Modeling Analysis in Appendix B), no harmful effects to either soil or vegetation would be expected. Furthermore, the proposed project would not be expected to change the status of visibility in the area of the Thomasville facility, based on existing visual observations of the area and of similar type facilities in other areas. The Air Division concurs with Westervelt Thomasville that the air quality analysis shows insignificant impacts with respect to visibility or soils and vegetation.

The proposed sawmill facility should not have any measurable effect on the surrounding population, nor should there be any additional industrial or residential growth attributed to the addition at the facility. Thus, the Air Division concurs that existing levels of air quality would not be expected to be affected by any direct or indirect growth which may be attributed to the proposed project at the sawmill facility.

The Westervelt Thomasville sawmill is located over 200 km from any PSD Class I Area and this project would not be expected to significantly impact any such area.

Emission Testing and Monitoring

I recommend that no emission testing be required for the proposed kiln at this time since it is expected that the kiln would be able to comply with the proposed BACT limitations, testing for continuous kilns is not easily conducted, and there are no emission control devices. I also recommend that no emission testing be required for the proposed Sawmill No. 2 at this time since calculations in the application indicate the capability of complying with the State allowable particulate emission rates and it is a fugitive source. If emission problems are observed in the future from these emission sources, testing may be required at that time.

To ensure that the maximum capacity of the proposed kiln is not exceeded, Westervelt Thomasville would be required to calculate the kiln production on a monthly and 12-month rolling total basis, to be updated within ten (10) days of the end of each calendar month.

Conclusions and Recommendations

This analysis indicates that this facility would meet the requirements of all applicable Federal and State rules and regulations. Therefore, I recommend that Westervelt Thomasville be issued Air Permit Nos. 102-S014-X005 and X006 for the proposed Sawmill No. 2 and Kiln No. 4 pending any comments received during the public comment period.

Olivia B. Toole
Chemical Branch
Air Division

DRAFT
Date

Appendix A

Air Dispersion Modeling Memo

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DIRECTOR

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DEPUTY DIRECTOR



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KAY IVEY
GOVERNOR

May 14, 2026

MEMORANDUM

TO: Olivia Toole *OST*
Natural Resources Section
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FROM: Ryan Gruver *RG*
Michael Leach *ML*
Meteorological Section
Planning Branch
Air Division

SUBJECT: Air Quality Analysis for The Westervelt Company Prevention of
Significant Deterioration Permit Application

ADEM has completed its review of an air quality analysis performed by Trinity Consultants on behalf of The Westervelt Company for their facility in Thomasville, Alabama. The purpose of the analysis was to assess the impacts on air quality from emissions of VOC from the facility. Since the project is only significant for VOC, AERMOD air dispersion modeling was not required for this project. However, a Modeled Emission Rates for Precursors (MERPs) analysis for Ozone was required.

MERPs ANALYSIS:

Precursor emission impacts for Ozone were considered and a Modeled Emission Rates for Precursors (MERPs) analysis was performed. The Ozone precursors are the pollutants VOC and NO_x. If the calculations from the MERPs analyses are less than 100%, it indicates that the air quality threshold will not be exceeded, and no further modeling is required. For Ozone, the following total emissions were considered: for VOC, 233.6 TPY; and for NO_x, 9.66 TPY. The Westervelt Company evaluated the EPA hypothetical sources closest to its facility in Thomasville, Alabama. These hypothetical sources were modeled by EPA and the results from the modeling can be used in a MERPs analysis. The Westervelt Company determined that the most representative source was the Autauga County, Alabama source. The Westervelt Company used the EPA MERPs



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(251) 479-2593 (FAX)

equation to determine if the Ozone impact at the facility was less than the Ozone SIL of 1 ppb. The following is the calculation, based on the MERPs equation using 500 tpy of VOC and 500 tpy of NOx, with a stack height of 10 m:

Project Impact (ppb) = tpy NOx from source/tpy hypothetical source NOx Emission × Max Modeled Concentration (ppb) + tpy VOC from source/tpy hypothetical source VOC Emission × Max Modeled Concentration (ppb)

and calculated as follows: = (9.66 tpy/500 tpy × 2.01172 ppb) + (233.6 tpy/500 tpy × 0.064137 ppb)
=(0.0389 + 0.0300) ppb
= 0.0689 ppb

This shows that the MERPs value for Ozone is below the SIL of 1 ppb, and therefore no further analysis was required.

CONCLUSION

In conclusion, emissions of VOC from The Westervelt Company facility in Thomasville, Alabama, are not expected to cause or contribute to any violation of a NAAQS or PSD Increment.

Appendix B

Draft Permits

AIR PERMIT

PERMITTEE: THE WESTERVELT COMPANY INC
FACILITY NAME: WESTERVELT LUMBER THOMASVILLE LLC
LOCATION: THOMASVILLE, CLARKE COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
102-S014-X005	One 116.8 MMBF/yr Continuous Lumber Dry Kiln with a 45 MMBtu/hr Natural gas-fired Burner (CDK-4A-B)

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.

ISSUANCE DATE: DRAFT

Alabama Department of Environmental Management

WESTERVELT LUMBER THOMASVILLE, LLC.
THOMASVILLE, ALABAMA
PERMIT NO. 102-S014-X005
PROVISOS

1. 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.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate, reduce, or control the issuance of air contaminants.
4. The permittee shall keep this permit 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.
5. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
6. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
7. Each point of emission, which requires testing, will 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.
8. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
9. This process, including 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.

10. 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.
11. Submittals 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 stack emission testing at any time.
12. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
13. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
14. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

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.

15. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
16. 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.
17. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will 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 plants or haul roads and grounds:

- (a) by the application of water at any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, 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.
19. The permittee shall not be used as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

PERMIT NO. 102-S014-X005

20. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
21. 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).
22. The permittee shall submit an Annual Compliance Certification to the Air Division no later than April 14th of each year for each annual reporting period of February 14th through February 13th.
 - (a) The compliance certification shall include the following:
 - i) The identification of each term or condition of this permit that is the basis of the certification;
 - ii) The compliance status;
 - iii) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);
 - iv) Whether compliance has been continuous or intermittent; and
 - v) Such other facts as the Department may require determining the compliance status of the source.
 - (b) The compliance certification shall be submitted to:

Alabama Department of Environmental Management
Air Division
P.O. Box 301463
Montgomery, AL 36130-1463

The compliance certification 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.

Continuous Dry Kiln No. 4

Summary Page

Description: CDK4A-B - 116,800 MBF/yr Continuous Lumber Dry Kiln with a 45 MMBtu/hr Natural Gas-fired Burner

Installation Date: *Proposed January 2027*

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
CDK 4A-B	116,800 MBF Continuous Lumber Dry Kiln	Opacity	$\leq 20\%$ as determined by six-minute average, with one six-minute period up to 40% in any one-hour period.	ADEM Admin. Code r. 335-3-14-.01
		PM	$E=3.59(P)^{0.62}$ for $P < 30$ TPH or $E=17.31(P)^{0.16}$ For $P \geq 30$ tph	ADEM Admin. Code r. 335-3-14-.04
		VOC (WPP1)	4.0 lb/MBF (BACT)	ADEM Admin. Code r. 335-3-14-.04

One 116,800 MBF/yr Continuous Lumber Dry Kiln, with a 45 MMBtu/hr Natural Gas-fired Burner

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
1. <u>Applicability</u> (a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits.” (b) This unit is subject to the applicable requirements of the National Emission Standards of Hazardous Air Pollutants for Plywood and composite Wood Products, 40 CFR Part 63, Subpart DDDD, and to the NESHAP General Provisions, 40 CFR Part 63, Subpart A as provided in 40 CFR §63.2290 and Table 10 of Subpart DDDD. (c) This kiln 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 Permitting (PSD)]”. 2. <u>Emission Standards</u> (a) The permittee shall not cause or permit the emissions of particulate matter in any 1-hour period from this process to exceed the amount determined by use of the following equation: $E=3.59P^{0.62} (P<30 \text{ tons per hour})$ or $E=17.31P^{0.16} (P\geq 30 \text{ tons per hour})$ Where: E = Emissions in pounds per hour P= Process weight in tons per hour (b) The Permittee shall not cause or allow visible emissions with a six-minute average opacity greater than 20% to be emitted more than once during any 60-minute period. The Permittee shall not cause or allow visible emissions with a six-minute average opacity of greater than 40% to be emitted at any time.	ADEM Admin. Code r. 335-3-16-.03 ADEM Admin. Code r. 335-3-11-.06(81) 40 CFR §63.2290, Table 10 Subpart DDDD ADEM Admin Code r. 335-3-14-.04 ADEM Admin. Code r. 335-3-4-.04(1) ADEM Admin. Code r. 335-3-4-.01(1)

Federally Enforceable Provisos	Regulations
(c) The Permittee shall not cause or allow volatile organic compounds (VOC) to be emitted from this kiln to exceed 4.0 lb/MBF as WPP1 (BACT Requirement). (d) This unit is restricted to burn natural gas only.	ADEM Admin. Code r. 335-3-14-.04
3. <u>Compliance and Performance Test Methods and Procedures</u> (a) The Permittee shall conduct the initial compliance demonstrations that do not require performance tests upon initial startup, no later than 30 calendar days after the applicable compliance date specified in 40 CFR §63.2233(e)(1), in accordance with 40 CFR §63.2261(b). (b) The Permittee shall submit a Notification of Compliance Status no later than 30 days following the completion of each initial compliance demonstration that does not include a performance test, in accordance with 40 CFR §63.2280(d)(1). (c) There are no performance test methods or procedures applicable to this process. The initial compliance demonstrations shall be conducted in accordance with the applicable requirements of Table 6 to 40 CFR part 63, subpart DDDD.	ADEM Admin. Code r. 335-3-11.06(81)
4. <u>Emission Monitoring</u> (a) The Permittee shall operate and maintain Kiln No. 4 in accordance with its operating and maintenance plan (OMP) maintained onsite. (b) <u>The OMP shall at minimum</u> include procedures for maintaining the integrity of the kiln's internal air flow and heat distribution components, charge optimization practices to reduce over drying lumber, annual kiln integrity inspections, and corrective action procedures as required by 40 CFR §63.2253(a). The OMP must be implemented upon startup of this process. (i) Conduct daily routine maintenance including clean debris from around the kiln and pusher tracks; visually inspect the primary air fan, gas train, gas burner; visually inspecting and lubricating kiln cart pusher axle bearings; and lubricate kiln cart's wheels as needed.	ADEM Admin. Code r. 335-3-1-.05 ADEM Admin. Code r. 335-3-11.06(81)

Federally Enforceable Provisos	Regulations
(ii) Conduct weekly inspections of fan drive and kiln cart pusher hydraulic system, including oil levels and hose connections. (iii) Conduct monthly routine maintenance including the kiln cart pusher grease pawl manifold, inspecting the kiln fan shafts and lubricating as needed, and inspecting and cleaning the primary air fan inlet filters on the kiln burner. (iv) Conduct quarterly inspections of the plenum hatches and clean as necessary. Inspect all applicable temperature monitoring system components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion, in accordance with 40 CFR §63.2269(b)(6); (v) Conduct semiannual routine maintenance on fan bearings and lubricate as needed; replace hydraulic filter on the kiln cart pusher hydraulic system; lubricate the primary air fan electric motors on the kiln burner; and validate the reading of each dry bulb temperature sensor in accordance with 40 CFR §63.2269(b)(4), using one of the applicable validation methods identified in the Temperature Monitoring System Quality Assurance Section of the OMP. (vi) Conduct annual routine maintenance on Kiln No. 4 including lubricating the kiln fan electric motors as needed, lubricating kiln cart pusher hydraulic system electric motors, lubricating kiln vent hinges and linkage as needed, inspecting the natural gas train and gas burner system, and performing an internal kiln cleaning during kiln shut down. (vii) The average moisture content shall be maintained greater than 6 percent during each production run to prevent over-drying lumber. The moisture content of finished lumber shall be automatically measured in the grader infeed system in accordance with the facility's current OMP. (viii) At least annually, review the charge optimization practices used during the preceding year to reduce over drying lumber and revise the practices as necessary in	

Federally Enforceable Provisos	Regulations
accordance with 40 CFR §63.2253. The Permittee shall document the results of the review, and identify any corrective actions performed. (c) The Permittee shall conduct an <u>annual tune-up of the</u> combustion unit used to directly fire Kiln No. 4 in accordance with 40 CFR §63.2241(d) and the procedures specified in 40 CFR §63.2271(c) and as follows: (i) The initial tune-up shall be completed by the applicable compliance date. Each subsequent tune-up shall be completed no more than 13 months after the previous tune-up. If the combustion unit is not operating on the required tune-up date, the tune-up shall be completed within 30 calendar days after startup of the combustion unit. (ii) Any cleaning, repair, replacement or corrective actions identified during the annual burner tune-up shall be initiated within 30 days and completed within 180 days following the tune-up. If corrective action cannot be completed within 180 days, the Permittee may submit a written request for an extension to the delegated authority before the expiration of the 180-day period. The request shall identify the corrective action, explain why additional time is necessary, and provide the anticipated completion date. (d) The permittee shall minimize over-drying lumber to reduce hazardous air pollutant emissions by complying with the selected <u>temperature limit work practice option</u> in accordance with 40 CFR §63.2241(e)(3)(i) and as follows: (i) The Permittee shall operate Kiln No. 4 with a maximum dry bulb temperature limit of 245°F. The Permittee shall continuously monitor and record the dry bulb temperature during the kiln drying cycle, at a minimum, at least 4 times per hour (i.e. every 15 minutes) in accordance with 40 CFR §63.2269(a)(b) and(m). (ii) The Permittee shall calculate a daily block average dry bulb temperature from the recorded readings in accordance with 40 CF §63.2270(h)(1). The daily dry bulb temperature shall not exceed 245°F. (iii) The Permittee shall have at least 75 percent of the required readings based on valid data for each applicable averaging	

Federally Enforceable Provisos	Regulations
period in accordance with 40 CFR §63.2270(f). Data recorded during monitoring malfunctions, associated repairs, out of control periods, and required quality assurance activities shall not be used when calculating data averages as specified in 40 CFR §63.2270(b) and (c). (e) The permittee shall conduct an annual inspection of Kiln No. 4 to verify the integrity of the air flow and heat distribution components, including, but not limited to, baffles, fans, vents, heating coils, or temperature sensors. The permittee shall also annually review the charge optimization practices in accordance with 40 CFR §63.2253 (a)(1) through (3) and as follows: (i) The initial inspection should be completed by the applicable compliance date. Each subsequent inspection shall be completed no more than 13 months from the previous inspection. (ii) Corrective actions identified during the inspection shall be initiated within 30 days after the inspection and completed within 180 days following the inspection which identified the need for corrective action. If corrective action cannot be completed within 180 days, the Permittee may submit a written request for an extension to the delegated authority before expiration of the 180-day period. The delegated authority may grant an extension upon determining that additional time is necessary. (f) The permittee shall implement all necessary corrective actions identified during routine maintenance and inspections and maintain records of all inspections, tuneups, maintenance activities, repairs, corrective actions, charge optimization reviews, and temperature monitoring activities required by this permit and 40 CFR 63, Subpart DDDD. All records shall be readily available during inspections and upon request. (g) The Permittee shall keep records of conducted maintenance to demonstrate compliance with the BACT designated Good Operating Procedures and Work Practices plan outlined in the current OMP.	

Federally Enforceable Provisos	Regulations
(h) Any updates to the OMP shall be documented in the semiannual compliance report in accordance with 40 CFR §63.2253(a)(4) and submitted to the Air Division for prior approval.	
5. <u>Recordkeeping and Reporting Requirements</u>	
(a) The Permittee shall retain all required records in a permanent form suitable and readily available for inspection for a period of five (5) years from the date of generation of each record.	ADEM Admin. Code r. 335-3-16-.05(c)
(b) The Permittee shall maintain records documenting compliance with the site-specific maintenance and operating practices required by Proviso 4(a) for the Emission Unit.	ADEM Admin. Code r. 335-3-16-.05(c)
(c) Should the facility exceed any applicable emission or operating limit of for this kiln, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.	
(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.	ADEM Admin. Code r. 335-3-16-.05(c)
(e) The Permittee shall submit a Semiannual Monitoring Report for this kiln to the Air Division, no later than 60 days after the end of each semiannual reporting period (January 1st to June 30th and July 1st to December 31st). This report shall include a certification that all proper operating and maintenance practices were accomplished as required during the reporting period, and if not, describe the date and reason any required action was not accomplished. The permittee shall also certify semiannually that only natural gas was fired in this unit.	ADEM Admin. Code r. 335-3-16-.05(c)
(f) The Permittee shall submit a Semiannual Compliance Report (SCR) containing the information specified in 40 CFR §63.2281, as applicable. Reports must be postmarked or delivered no later than July 31 for the reporting period of January 1-June 30, and January 31, for the reporting period of July 1- December 31.	ADEM Admin. Code r. 335-3-11.06(81)
(g) The Permittee shall submit a copy of each SCR to the Air Division by the applicable deadlines specified in Proviso in 5(f) above.	

AIR PERMIT

PERMITTEE: THE WESTERVELT COMPANY INC
FACILITY NAME: WESTERVELT LUMBER THOMASVILLE LLC
LOCATION: THOMASVILLE, CLARKE COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
102-S014-X006	Sawmill No. 2 Operations (EU011); Receiving Material from existing Debarker (FD01) and Chipper (FC01)

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.

ISSUANCE DATE: DRAFT

WESTERVELT LUMBER THOMASVILLE, INC.
THOMASVILLE, ALABAMA
PERMIT NO. 102-S014-X006
PROVISOS

1. 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.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate, reduce, or control the issuance of air contaminants.
4. The permittee shall keep this permit 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 people who may request to see it.
5. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
6. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
7. Each point of emission, which requires testing, will 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.
8. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events **that exceed 1 hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.
9. This process, including 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 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.

10. 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.
11. Submittals 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 stack emission testing at any time.
12. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
13. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
14. Unless otherwise stated in this permit or an applicable regulation, the Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- (c) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

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.

15. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
16. 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.
17. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will 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:

- (a) 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;
- (b) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
- (c) by paving;
- (d) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;

Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.

18. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, 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.
19. 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.

PERMIT NO. 102-S014-X006

20. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
21. 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).
22. The permittee shall submit an Annual Compliance Certification to the Air Division no later than April 14th of each year for each annual reporting period of February 14th through February 13th.
 - (a) The compliance certification shall include the following:
 - i) The identification of each term or condition of this permit that is the basis of the certification;
 - ii) The compliance status;
 - iii) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements);
 - iv) Whether compliance has been continuous or intermittent; and
 - v) Such other facts as the Department may require to determine the compliance status of the source.
 - (b) The compliance certification shall be submitted to:

Alabama Department of Environmental Management
Air Division
P.O. Box 301463
Montgomery, AL 36130-1463

The compliance certification 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.

**Sawmill No. 2 Operations
Summary Page**

Description: Sawmill No. 2 Operations (Fugitive)

Installation Date: *Proposed September 2026*

Operating Capacity: 30 MBF/hr.

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

Emission Limitations:

Emission Point No.	Description	Pollutant	Emission Limit	Regulation
Fugitive	Sawmill No. 2 Operations	PM	N/A	N/A

Sawmill No. 2 Operations
Unit Specific Provisos

Unit Specific Provisos	Regulations
1. <u>Applicability</u> (a) This unit is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits.” (b) This source is subject 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))”. 2. <u>Emission Standards</u> (a) There are no emission standards for this process. 3. <u>Compliance and Performance Test Methods and Procedures</u> (a) There are no compliance or performance test methods and procedures for this process. 4. <u>Emission Monitoring</u> (a) At least once per week, the Permittee shall inspect the conveyer systems and transfer points for leaks. Any spillage noted around the work areas shall be removed and all leaks repaired in a timely manner. (b) The Permittee shall operate the conveyer systems in a manner to ensure materials are confined. (c) The Permittee shall inspect the conveyer belts at least once in each calendar quarter for serviceability and repair them as necessary.	ADEM Admin. Code r. 335-3-16-.03 ADEM Admin Code r. 335-3-14-.04 ADEM Admin. Code r. 335-3-16-.05(c)

Unit Specific Provisos	Regulations
5. <u>Recordkeeping and Reporting Requirements</u> (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. These records shall include: 1) The date, time and results of each conveyer system and transfer point inspection and the name of the individual performing the inspection; 2) If the results of the inspection indicated that maintenance was needed, the date(s) and nature of the maintenance performed; 3) The date and results of the last inspection of the conveyer belts. (b) The Permittee shall submit a Semiannual Monitoring Report, as required by General Permit Proviso No. 21, to the Air Division no later than 60 days after the end of each semiannual reporting period (January 1st – June 30th and July 1st – December 31st). 1) This report shall include a certification that all emission monitoring, proper operating practices, and record keeping, were accomplished as required during the reporting period, and if not, describe the date(s) and reason(s) any required action was not accomplished. 2) This report shall also include the date(s) and nature of any maintenance that was needed.	ADEM Admin. Code r. 335-3-16-.05 ADEM Admin. Code r. 335-6-16-.05