

MAJOR SOURCE OPERATING PERMIT

PERMITTEE: STELLA JONES CORPORATION
FACILITY NAME: STELLA JONES-BRIERFIELD.
FACILITY NO.: 401-0011
LOCATION: BRIERFIELD, BIBB 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: August 25, 2029

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General Permit Provisos

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<p>1. <u>Transfer</u></p> <p>This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code r. 335-3-16-.13(1)(a)5.</p>	<p>ADEM Admin. Code r. 335-3-16-.02(6)</p>
<p>2. <u>Renewals</u></p> <p>An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.</p> <p>The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.</p>	<p>ADEM Admin. Code r. 335-3-16-.12(2)</p>
<p>3. <u>Severability Clause</u></p> <p>The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(e)</p>
<p>4. <u>Compliance</u></p> <p>(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.</p> <p>(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(f)</p> <p>ADEM Admin. Code r. 335-3-16-.05(g)</p>
<p>5. <u>Termination for Cause</u></p> <p>This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(h)</p>

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<p>6. <u>Property Rights</u></p> <p>The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.</p>	ADEM Admin. Code r. 335-3-16-.05(i)
<p>7. <u>Submission of Information</u></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>	ADEM Admin. Code r. 335-3-16-.05(j)
<p>8. <u>Economic Incentives, Marketable Permits, and Emissions Trading</u></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>	ADEM Admin. Code r. 335-3-16-.05(k)
<p>9. <u>Certification of Truth, Accuracy, and Completeness</u></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>	ADEM Admin. Code r. 335-3-16-.07(a)
<p>10. <u>Inspection and Entry</u></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> <ul style="list-style-type: none"> (a) Enter upon the permittee’s premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility’s equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; 	ADEM Admin. Code r. 335-3-16-.07(b)

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<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>11. <u>Compliance Provisions</u></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>12. <u>Compliance Certification</u></p> <p>The Permittee shall submit a complete and accurate compliance certification by October 25th of each year for each annual reporting period of this permit (August 26th - August 25th).</p> <p>(a) The compliance certification shall include the following:</p> <ol style="list-style-type: none"> (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code r. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); (4) Whether compliance has been continuous or intermittent; (5) Such other facts as the Air Division may require to determine the compliance status of the source; <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>ADEM Admin. Code r. 335-3-16-.07(c)</p> <p>ADEM Admin. Code r. 335-3-16-.07(e)</p>

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<p><u>13. Reopening for Cause</u></p> <p>Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit:</p> <ul style="list-style-type: none"> (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. (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. (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. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements. 	<p>ADEM Admin. Code r. 335-3-16-.13(5)</p>
<p><u>14. Additional Rules and Regulations</u></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>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p>
<p><u>15. Equipment Maintenance or Breakdown</u></p> <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (1) Identification of the specific facility to be taken out of service as well as its location and permit number; (2) The expected length of time that the air pollution control equipment will be out of service; 	<p>ADEM Admin. Code r. 335-3-1-.07(1),(2)</p>

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<p>(3) The nature and quality of emissions of air contaminants likely to occur during the shutdown period;</p> <p>(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;</p> <p>(5) The reasons that it would be impossible or impractical to shut down the sources operation during the maintenance period.</p> <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 will be notified when the breakdown has been corrected.</p> <p>16. <u>Operation of Capture and Control Devices</u></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>17. <u>Obnoxious Odors</u></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>18. <u>Fugitive Dust</u></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 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:</p>	<p></p> <p></p> <p></p> <p></p> <p>§22-28-16(d), <u>Code of Alabama 1975</u>, as amended</p> <p></p> <p>ADEM Admin. Code r. 335-3-1-.08</p> <p></p> <p>ADEM Admin. Code r. 335-3-4-.02</p>

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<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>19. <u>Additions and Revisions</u></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>20. <u>Recordkeeping Requirements</u></p> <p>(a) Records of required monitoring information of the source shall include the following:</p> <p>(1) The date, place, and time of all sampling or measurements;</p> <p>(2) The date analyses were performed;</p> <p>(3) The company or entity that performed the analyses;</p> <p>(4) The analytical techniques or methods used;</p> <p>(5) The results of all analyses; and</p> <p>(6) The operating conditions that existed at the time of sampling or measurement.</p> <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-.13 and 335-3-16-.14</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)2.</p>

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<p><u>21. Reporting Requirements</u></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 will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.</p> <p><u>22. Emission Testing Requirements</u></p> <p>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.</p> <p>The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.</p> <p>To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:</p> <p>(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.</p> <p>(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).</p> <p>(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.</p> <p>(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.</p> <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>ADEM Admin. Code r. 335-3-16-.05(c)3.</p> <p>ADEM Admin. Code r. 335-3-1-.05(3) and 335-3-1-.04(1)</p> <p>ADEM Admin. Code r. 335-3-1-.04</p> <p>ADEM Admin. Code r. 335-3-1-.04</p>

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<p>All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.</p>	
<p>23. <u>Payment of Emission Fees</u></p> <p>(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.</p> <p>(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.</p>	<p>ADEM Admin. Code r. 335-1-7-.05</p> <p>ADEM Admin. Code r. 335-1-7-.05</p>
<p>24. <u>Other Reporting and Testing Requirements</u></p> <p>Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.</p>	<p>ADEM Admin. Code r. 335-3-1-.04(1)</p>
<p>25. <u>Title VI Requirements (Refrigerants)</u></p> <p>Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.</p> <p>No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.</p> <p>The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR §82.166. Reports shall be submitted to the US EPA and the Department as required.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(a)</p>
<p>26. <u>Chemical Accidental Prevention Provisions</u></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>40 CFR Part 68</p>

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<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>27. <u>Display of Permit</u></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 will make the permit readily available for inspection by any or all persons who may request to see it.</p>	<p>ADEM Admin. Code r. 335-3-14-.01(1)(d)</p>
<p>28. <u>Circumvention</u></p> <p>No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.</p>	<p>ADEM Admin. Code r. 335-3-1-.10</p>
<p>29. <u>Visible Emissions</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.</p>	<p>ADEM Admin. Code r. 335-3-4-.01(1)</p>
<p>30. <u>Fuel-Burning Equipment</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.03.</p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-5-.01.</p>	<p>ADEM Admin. Code r. 335-3-4-.03</p> <p>ADEM Admin. Code r. 335-3-5-.01</p>
<p>31. <u>Process Industries – General</u></p> <p>Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in ADEM Admin. Code r. 335-3-4-.04.</p>	<p>ADEM Admin. Code r. 335-3-4-.04</p>

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<p>32. <u>Averaging Time for Emission Limits</u></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>33. <u>Open Burning</u></p> <p>Precautions should be taken to ensure that no person shall ignite, cause to ignite, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.</p>	<p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-3-.01</p>

Emission Unit No. 002 (Boiler No. 002)

Summary Page

Description: 28.7 MMBtu/hr wood-fired boiler with in-stack cyclone (Cyclone #2)

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
002	Exhaust stack for Cyclone #2 of the 28.7 MMBtu/hr wood-fired boiler	PM	0.20 gr/dscf @ 50% excess air	ADEM Admin. Code r. 335-3-4-.08 (SIP)
		SO ₂	4.0 lb/MMBtu heat input	ADEM Admin. Code r. 335-3-5-.01 (SIP)
		VOC	N/A	N/A
		NO _x	N/A	N/A
		CO	N/A	N/A
		HAP	N/A	N/A

Emission Unit No. 002 (Boiler No. 2)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p> <p>(b) This boiler is subject to the applicable requirements of 40 CFR, Subpart Dc, Standards of Performance for New Stationary Sources for Small Industrial-Commercial-Institutional Steam Generating Units.</p> <p>(c) This boiler is subject to the applicable requirements of 40 CFR 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions</p> <p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter to exceed 0.20 grains per dry standard cubic foot (gr/dscf), adjusted to fifty percent (50%) excess air.</p> <p>(b) The permittee shall not cause or allow the emissions of sulfur dioxide to exceed 4.0 pounds per million BTU heat input (lb/MMBtu).</p> <p>(c) The permittee shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period from this boiler. At no time shall the permittee discharge a 6-minute average opacity of particulate emissions greater than 40% from this boiler.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate shall be measured in accordance with Method 5 at 40 CFR Part 60, Appendix A.</p> <p>(b) If testing is required, the sulfur dioxide emission rate shall be measured in accordance with Method 6 or 6C at 40 CFR Part 60, Appendix A.</p> <p>(c) If testing is required, the opacity of particulate emissions from the boiler shall be determined in accordance with Method 9 at 40 CFR Part 60, Appendix A.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-10-.02(c) & 40 CFR 60, Subpart Dc</p> <p>40 CFR 63, Subpart JJJJJJ</p> <p>ADEM Admin. Code r. 335-3-4-.08(2)(d)</p> <p>ADEM Admin. Code r. 335-3-5-.01(b)</p> <p>ADEM Admin. Code r. 335-3-4-.01</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p> <p>ADEM Admin. Code r. 335-3-1-.05</p>

Federally Enforceable Provisos	Regulations
<p>4. Emission Monitoring</p> <p>(a) While the boiler is operating, someone familiar with the process shall perform an instantaneous check of the the visible emissions from the stack at least once per day during the daylight hours to determine if the emissions are greater than normal, as determined by previous observations. If greater than normal visible emissions are observed, the permittee shall initiate corrective action as soon as practicable, but no longer than 24 hours from the time of instantaneous check, followed by an additional observation to verify the visible emissions have been returned to normal.</p> <p>(b) To ensure proper operation, the cyclone shall be inspected and cleaned at least annually, the permittee shall inspect the cyclone at least annually, but more frequently if visible emissions greater than normal are observed. If the inspection indicates that cleaning or emissions-related maintenance is required, the permittee shall initiate such action as soon as practicable but no longer than 24 hours from the time of inspection.</p> <p>(c) While the boiler is operating, the permittee shall utilize a properly installed, calibrated, and operated O₂ monitor to record the percent oxygen (%O₂) in the flue gas. The O₂ monitor shall be calibrated at least annually against a known standard.</p> <p>(d) If the %O₂ of the flue gas is outside the recommended operating range (7% ± 2%, averaged over a 24-hour period), the permittee shall initiate corrective action as soon as practicable but no longer than 24 hours from the time of observation to return the %O₂ of the flue gas to the recommended operating range. Each 24-hour averaging period shall begin at 12:00 a.m., and the permittee shall calculate and record each 24-hour average within 12 hours of the end of each averaging period during which the boiler operated.</p> <p>(e) The permittee shall calculate and record the fuel usage for this boiler on either a daily or monthly basis.</p> <p>(f) The permittee shall only burn wood for fuel. The permittee shall not change the type of fuel used to fire the burner without prior approval from the Air Division.</p> <p>(g) The permittee shall conduct a performance tune-up of Boiler No. 2 on a biennial basis. Each tune-up shall be conducted no more than 25 months after the previous tune-up, except as allowed in 40 CFR §63.11223(c). If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup. Each tune-up shall be conducted in accordance with the requirements of 40 CFR §63.11223(b), which include, as applicable:</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-10-.02(c) & 40 CFR §60.48c(g)</p> <p>ADEM Admin. Code r. 335-3-14-.01</p> <p>40 CFR §63.11201, §63.11223, and Table 2 to 40 CFR Part 63, Subpart JJJJJJ</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> (1) Inspect the burner and clean or replace any components of the burner, as necessary; (2) Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern. The adjustment shall be consistent with the manufacturer's specifications, if available; (3) Inspect the system controlling the air-to-fuel ratio and ensure that it is correctly calibrated and functioning properly; (4) Optimize total emissions of carbon monoxide. This optimization shall be consistent with the manufacturer's specifications, if available; (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made); (6) Prepare and maintain on site a report containing the following information: <ul style="list-style-type: none"> a. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler. b. A description of any corrective actions taken as a part of the tune-up of the boiler. 	
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <ul style="list-style-type: none"> (a) Should this facility, at any time, exceed any limit, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred. (b) The permittee shall maintain records of the required emission monitoring on-site in a permanent form suitable for inspection and readily available for inspection for at least five (5) years from the date of generation of each record. These records shall include: <ul style="list-style-type: none"> (i) Records of fuel usage on a daily or monthly basis; (ii) Records of the %O₂ monitoring data and the calculated 24-hour averages; (iii) The date, time, and results of each instantaneous check of visible emissions; 	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(iv) The date(s), time, nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and</p> <p>(v) The date(s) and time the cyclone was inspected for proper operation and, if the results of the inspection indicated that cleaning or emission-related maintenance was needed, the date(s), time, and nature of the cleaning/maintenance performed</p> <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 reporting period (August 26th - February 25th and February 26th - August 25th). The report shall include the following information for this emission unit:</p> <p>(i) 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 the monitoring was not performed;</p> <p>(ii) A statement as to whether the annual inspection of the cyclone was accomplished during the reporting period, and if so, the date and results of the inspection</p> <p>(iii) The date(s), time, nature, and results of any corrective action taken when (1) an excursion from an emission monitoring parameter was observed or (2) an inspection of the multiclone indicated that cleaning or emission-related maintenance was needed.</p> <p>(d) The permittee shall prepare biennial compliance reports in accordance with 40 CFR §63.11225(b). Reports should be prepared by March 1st of every other year after initial submittal. The permittee shall maintain the report in a permanent form and shall make the report readily available for inspection upon request.</p> <p>(e) The permittee shall maintain the applicable records outlined in 40 CFR §63.11225(c) in a form suitable and readily available for expeditious review and shall retain each record for 5 years following the date of each recorded action. The permittee shall keep each record on-site for at least 2 years after the date of each recorded action, but may keep the records off-site for the remaining 3 years. These records shall include, but may not be limited to, the following:</p> <p>1) A copy of each notification and report required to the comply with 40 CFR 63, Subpart JJJJJJ, and all documentation supporting any Initial Notification of Applicability or Notification of Compliance Status submitted;</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>40 CFR §63.11225(b)</p> <p>40 CFR §63.11225(c)</p>

Federally Enforceable Provisos	Regulations
<ul style="list-style-type: none"> 2) Records to document conformance with the management practices required by 40 CFR §63.11214 as specified in 40 CFR §63.11225(c)(2)(i) and (ii); 3) Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment; and 4) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore to malfunctioning boiler, air pollution control, or monitoring equipment to its normal or useful manner of operation. 	

**Emission Unit Nos. 004-A, 004-B, 004-C, and 004-D (Dry Kiln Nos.1, 2, 3, and 4)
Summary Page**

Unit No.	Description
004-A	Dry Kiln #1-108 MBF Lumber/Pole Dry Kiln (Steam-heated)
004-B	Dry Kiln #2-108 MBF Lumber/Pole Dry Kiln (Steam-heated)
004-C	Dry Kiln #3-120 MBF Lumber/Pole Dry Kiln (Steam-heated)
004-D	Dry Kiln #4-144 MBF Lumber/Pole Dry Kiln (Steam-heated)

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
DK-1 DK-2 DK-3 DK-4	Roof vents for Dry Kiln Nos. 1-4	PM	E=3.59P ^{0.62} (P < 30 TPH) OR E=17.31P ^{0.16} (P ≥ 30 TPH)	ADEM Admin. Code r. 335-3-4-.04 (SIP)
		VOC	N/A	N/A
		HAP	Production Limit 50 MMbf kiln-dried wood production during any rolling 12-month period	ADEM Admin. Code r. 335-3-14-.03

Emission Unit Nos. 004-A, 004-B, 004-C, and 004-D (Dry Kiln Nos.1, 2, 3, and 4)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></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 process is subject to a synthetic minor limitation to restrict the facility-wide emissions of hazardous air pollutants (HAP), as listed in ADEM Admin. Code 335-3, Appendix G, below the applicable major source thresholds for HAP during any consecutive 12-month period.</p> <p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or allow the emissions of particulate matter in any one hour from each unit in excess of the amount determined by the following equation:</p> <p align="center">$E = 3.95P^{0.62}$ (P < 30 tons per hour) or</p> <p align="center">$E = 17.31P^{0.16}$ (P ≥ 30 tons per hour)</p> <p align="center">where E = Emissions in pounds per hour</p> <p align="center">P = Process weight per hour in tons per hour.</p> <p>(a) The permittee shall not cause or allow the cumulative production of kiln-dried wood from this process to exceed 50,000,000 board feet (bf) during any rolling 12-month period.</p> <p>(b) The permittee shall not cause or allow the facility-wide emissions of an individual HAP to exceed 10 tons during any consecutive 12-month period and the facility-wide emissions of any combination of HAPs to exceed 25 tons during any consecutive 12-month period.</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) If testing is required, the particulate emission rate shall be measured in accordance with Method 5 at 40 CFR Part 60, Appendix A.</p> <p>(b) If testing is required, the volatile organic compound (VOC) emission rate shall be measured in accordance with Method 18 or 25A at 40 CFR Part 60, Appendix A, or an alternative method if prior approval is granted by the Director.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.03</p> <p>ADEM Admin. Code r. 335-3-4-.04(1)</p> <p>ADEM Admin. Code r. 335-3-14-.03</p> <p>ADEM Admin. Code r. 335-3-14-.03</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>4. <u>Emission Monitoring</u></p> <p>Within 10 days of the end of each calendar month, compliance with the production limitation shall be determined by calculating the total kiln-dried wood production for the previous calendar month and previous 12-month period.</p> <p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) Records of kiln-dried wood production for this process shall be maintained on a monthly and 12-month rolling total basis in a permanent form suitable for inspection. The records shall be retained for a period of five (5) years from the date of generation of each record and be made available upon request.</p> <p>(a) Should the kiln-dried wood production limitation be exceeded during any consecutive 12-month period, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.</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 reporting period (August 26th - February 25th and February 26th - August 25th). The report shall include the following information for this emission unit:</p> <p>(i) 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 the monitoring was not performed;</p> <p>(ii) The monthly and 12-month rolling totals for kiln-dried wood production calculated during the reporting period.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p> <p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Emission Unit No. 006 (Creosote and DCOIT Wood Preserving and Storage Operations)

Summary Page

Description: One (1) Creosote wood processing cylinder, associated process storage tanks, and treated wood storage areas

One (1) DCOIT wood processing cylinder, associated process storage tanks, and treated wood storage areas

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
CPT-1	Creosote Wood Processing Cylinder #1	VOC	Production Limit 5,400,540 ft ³ creosote treated wood production during any consecutive 12-month period	ADEM Admin. Code r. 335-3-14-.03
DCOIT-1	DCOIT Wood Processing Cylinder #1	HAP	NA	NA
F-CPTS	Treated Wood Storage Areas (Fugitive Emissions)	VOC	N/A	N/A
		HAP	N/A	N/A

Emission Unit No. 006 (Creosote Wood Preserving and Storage Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits.”</p> <p>(b) This process is subject to a synthetic minor limitation to restrict the facility-wide emissions of hazardous air pollutants (HAP), as listed in ADEM Admin. Code 335-3, Appendix G, below the applicable major source thresholds for HAP during any consecutive 12-month period.</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-14-.03</p>
<p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall not cause or allow the cumulative production of creosote-treated wood from this process to exceed 5,400,540 cubic feet (ft³) during any consecutive 12-month period.</p> <p>(b) The permittee has no emission requirements for DCOIT wood treatment.</p> <p>(c) The permittee shall not cause or allow the facility-wide emissions of an individual HAP to equal or exceed 10 tons during any consecutive 12-month period and the facility-wide emissions of any combination of HAP to equal or exceed 25 tons during any consecutive 12-month period.</p>	<p>ADEM Admin. Code r. 335-3-14-.03</p> <p align="center">N/A</p> <p>ADEM Admin. Code r. 335-3-14-.03</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>There are no unit specific compliance and performance test methods or procedures applicable to this process.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p> <p>Within 10 days of the end of each calendar month, compliance with the production limitation shall be determined by calculating the total creosote-treated wood production for the previous calendar month and previous 12-month period.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) Records of creosote-treated wood production for this process shall be maintained on a monthly and 12-month rolling total basis in a permanent form suitable for inspection. The records shall be retained for a period of five (5) years from the date of generation of each record and be made available upon request.</p>	<p>ADEM Admin. Code r. 335-3-16-.05(c)</p>

Federally Enforceable Provisos	Regulations
<p>(b) Should the creosote-treated wood production limitation be exceeded during any consecutive 12-month period, the permittee shall notify the Air Division within two (2) working days of determining that the exceedance occurred.</p> <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 reporting period (August 26th - February 25th and February 26th - August 25th). The report shall include the following information for this emission unit:</p> <p>(iii) 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 the monitoring was not performed;</p> <p>(iv) The monthly and 12-month rolling totals for creosote-treated wood production calculated during the reporting period.</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. 007 (DCOIT Wood Preserving and Storage Operations)

Summary Page

Description: Two (2) DCOIT treatment wood processing cylinders, associated process storage tanks, and treated wood storage areas

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
PPT-1	DCOIT Wood Processing Cylinder #1 and #2	VOC	N/A	N/A
PPT-2		HAP	N/A	N/A
PPTS-1	Treated Wood Storage Areas (Fugitive Emissions)	VOC	N/A	N/A
PPTS-2		HAP	N/A	N/A

Emission Unit No. 007 (DCOIT Wood Preserving and Storage Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits."</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p>
<p>2. <u>Emission Standards</u></p> <p>The permittee shall apply the preservative to the wood product inside a retort or similarly enclosed vessel.</p>	<p>N/A</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>There are no unit specific compliance and performance test methods or procedures applicable to this process.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p> <p>There are no unit specific emission monitoring requirements applicable to this process.</p>	<p>N/A</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>There are no unit specific emission monitoring requirements applicable to this process.</p>	<p>N/A</p>

Emission Unit No. 009 (Wastewater Treatment Operation)

Summary Page

Description: Wastewater treatment operation

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
WWT	Wastewater evaporation tank (Fugitive Emissions)	VOC	N/A	N/A
		HAP	N/A	N/A

Emission Unit No. 009 (Wastewater Treatment Operation)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></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>ADEM Admin. Code r. 335-3-16-.03</p>
<p>2. <u>Emission Standards</u></p> <p>There are no unit specific emission standards applicable to this process.</p>	<p>N/A</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>There are no unit specific compliance and performance test methods or procedures applicable to this process.</p>	<p>N/A</p>
<p>4. <u>Emission Monitoring</u></p> <p>There are no unit specific emission monitoring requirements applicable to this process.</p>	<p>N/A</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>There are no unit specific recordkeeping or reporting requirements applicable to this process.</p>	<p>N/A</p>

Emission Unit No. 011 (CCA Wood Preserving and Storage Operations)

Summary Page

Description: One (1) chromated copper arsenate (CCA) wood processing cylinder, associated process storage tank, and treated wood storage area

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
CCA-1	CCA Wood Processing Cylinder	HAP	N/A	N/A
F-CCA-1	Treated Wood Storage Area (Fugitive Emissions)	HAP	N/A	N/A

Emission Unit No. 011 (CCA Wood Preserving and Storage Operations)

Unit Specific Provisos

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></p> <p>(a) This process is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, “Major Source Operating Permits.”</p> <p>(b) This process is subject to the applicable requirements of 40 CFR 63, Subpart QQQQQQ (National Emission Standard for Hazardous Air Pollutants for Wood Preserving Operations) and the applicable requirements of 40 CFR 63, Subpart A (General Provisions) as outlined in Table 1 to Subpart QQQQQQ.</p> <p>2. <u>Emission Standards</u></p> <p>The permittee shall apply the preservative to the wood product inside a retort or similarly enclosed vessel (40 CFR §63.11430(a)).</p> <p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>There are no unit specific compliance and performance test methods or procedures applicable to this process.</p> <p>4. <u>Emission Monitoring</u></p> <p>The permittee shall operate according to a management practice plan to minimize air emissions from the preservative treatment of wood (40 CFR §63.11430(c)). The plan shall include, but is not limited to, the following activities:</p> <p>(a) Minimize preservative usage;</p> <p>(b) Maintain records on the type of treatment process and types and amounts of wood preservatives used at the facility;</p> <p>(c) Maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessel);</p> <p>(d) Store treated wood product on drip pads or in a primary containment area to convey preservative drippage to a collection system until drippage has ceased;</p> <p>(e) Fully drain the retort to the extent practicable, prior to opening the retort door;</p> <p>(f) Promptly collect any spills; and</p> <p>(g) Perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations</p>	<p>ADEM Admin. Code r. 335-3-16-.03</p> <p>ADEM Admin. Code r. 335-3-11-.06 (146)</p> <p>ADEM Admin. Code r. 335-3-11-.06 (146)</p> <p>N/A</p> <p>ADEM Admin. Code r. 335-3-11-.06 (146)</p>

Federally Enforceable Provisos	Regulations
<p>5. Recordkeeping and Reporting Requirements</p> <p>(a) The permittee shall maintain the following records on-site in a permanent form suitable for inspection and readily available for inspection for at least five (5) years from the date of generation of each record. These records shall include:</p> <ul style="list-style-type: none"> (i) Records of the type of treatment process and types and amounts of wood preservatives used at the facility; (ii) Charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessel); and (iii) The date, time, and nature of any corrective action or preventative measure taken in the event of a malfunction. <p>(b) The permittee shall maintain a copy of the facility's management practice plan to minimize air emissions from the preservative treatment of wood on-site in a permanent form that is readily available and suitable for inspection. At a minimum, the plan shall contain the activities listed in 40 CFR §63.11430(c) applicable to this process. The permittee may use the facility's standard operating procedures to meet the requirements for a management practice plan if it includes the minimum activities required for a management practice plan and it is available in a permanent form suitable for inspection.</p> <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 reporting period (August 26th - February 25th and February 26th - August 25th). For this emission unit, the report shall include a statement as to whether the management practice plan was followed as required during the reporting period, and if not, the date(s) and reason(s) why the plan was not followed.</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>

Provisos for Facility-Wide Fugitive Dust Plan

Federally Enforceable Provisos	Regulations
<p>1. <u>Applicability</u></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>ADEM Admin. Code r. 335-3-16-.03</p>
<p>2. <u>Emission Standards</u></p> <p>(a) The permittee shall take reasonable precautions as directed in Proviso 3(a) to prevent fugitive dust at the facility which travel beyond the facility property line and cause a nuisance.</p>	<p>ADEM Admin. Code r. 335-3-4-.02</p>
<p>3. <u>Compliance and Performance Test Methods and Procedures</u></p> <p>(a) The permittee shall utilize the Fugitive Dust Plan in Appendix A in order to minimize and address fugitive dust emissions.</p>	<p>ADEM Admin. Code r. 335-3-16-.07</p>
<p>4. <u>Emission Monitoring</u></p> <p>(a) 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>ADEM Admin. Code r. 335-3-16-.05</p>
<p>5. <u>Recordkeeping and Reporting Requirements</u></p> <p>(a) 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-.05</p>

Appendix A

Fugitive Dust Control Plan

**Stella Jones - Brierfield
12755 Montevallo Road
Brierfield, Alabama 35035**

September 2024



**1900 Crestwood Blvd., Suite 114
Birmingham, Alabama 35210**

Phone (205) 951-3700

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1.0 Introduction

Fugitive dust is particulate matter resulting from industrial activities generated in the open air (e.g., not through a stack). It includes both visible and non-visible particulate matter.

The Alabama Department of Environmental Management (ADEM) regulates fugitive dust pursuant to Alabama Code of Admin. Rule 335-3-4-.02, *Fugitive Dust*. This rule states that “no person shall cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.

2.0 Health and Environmental Impacts

Fugitive dust is an air pollutant that can be generated during activities such as sawmill operations. Not only is dust a hazard to workers, it is a hazard to the public and affects the environment.

2.1 Health Hazards

Fine dust inhaled deep into the lungs has been linked to a variety of health problems, ranging from nose and throat irritation to respiratory illnesses, such as bronchitis, lung-damage, and asthma. The silica in dust has been shown to cause silicosis, chronic obstructive pulmonary disease, and renal disease.

2.2 Environmental Hazards

Dust can migrate into nearby surface water, where it affects aquatic communities and contributes to the nutrient loading of the surface water ecosystem. Additionally, fugitive dust that settles on nearby vegetation can weaken or kill the vegetation.

Wind generation of dust particles can cause the erosion of valuable topsoil and contribute to the soiling and discoloration of personal property.

3.0 Plan Objectives

The Fugitive Dust Control Plan identifies control measures and practices to minimize and control fugitive dust. The plan defines the ways in which personnel and subcontractors will mitigate dust emissions at the plant.

To meet these objectives, the Fugitive Dust Control Plan:

- Identifies potential fugitive dust sources at the facility

- Identifies control measures and practices to control and minimize fugitive dust
- Identifies fugitive dust control record keeping requirements
- Identifies fugitive dust control notification requirements

4.0 Facility Operations

Incoming logs are conveyed to the pole mill operations where they are debarked, cut to length, classified, trimmed, and sized. Large wood waste pieces are conveyed to a chipper and screened. Large, screened pieces are then conveyed to a hog (hammermill). Hogged and screened wood waste along with the sawdust shavings are transported to the boiler fuel bin.

Following milling operations, the poles, and milled poles from off-site are either air dried or conveyed to one of four dry kilns, each having a cycle time approximately 72 hours.

Dried poles are conveyed to a framing shed where the poles are drilled, cut branded, and tagged. Tagged poles are then conveyed to one of the following wood preserving operations: creosote, DCOIT, or CCA. Following wood preserving operations, the poles are stored on-site and eventually transported off-site.

Steam for the dry kilns is supplied by a 28.7 MMBtu/hr wood waste fired boiler. Emissions from the boiler are conveyed to a cyclone.

5.0 Fugitive Dust Sources and Controls

Potential sources of fugitive dust include the following: Pole Mill and Framing Shed Wood Waste Handling Operations, Boiler Fuel Handling and Storage, Access Roads, and Pole Yard.

5.1 Pole Mill/Framing Shed Waste Handling Operations

5.1.1 Activities

Debarking at Pole Mill Operations occurs within buildings. Wood waste from the Pole Mill Operations (bark, chips, sawdust, shavings, etc.), Framing Shed Operations (chips), and off-site wood waste is conveyed to an outside Hammermill (Hog) for size reduction. Because of the particle size, wood waste from the operation is not considered to be a significant source of fugitive dust.

5.1.2 Precautions

If necessary, keep transfer area wet, by using water sprays, to prevent windblown emissions.

5.2 Boiler Fuel Handling and Storage

5.2.1 Activities

Incoming wood waste from the Hammermill is auger into the fuel house, which is enclosed. The chances of fugitive dust is minimal.

5.2.2 Precautions

Keep fuel piles within the confines of the fuel house to avoid windblown emissions of particulate matter.

5.3 Access Roads

5.5.1 Activities

Drag-out tracks from pole yard access onto the access roads can contribute to the formation of fugitive dust.

5.5.2 Precautions

Weekly cleaning of the access roads using a mechanical sweeper. Limit vehicle speeds to 10 mph.

5.4 Pole Yard

5.6.1 Activities

Fugitive dust is generated from loaders and haul trucks traveling through the pole yard.

5.6.2 Precautions

Utilize water trucks to prevent fugitive dust from being airborne on as needed basis. Limit vehicle speeds to 5 mph.

6.0 Inspections

In order to assure that the fugitive dust control measures outlined in this Plan are implemented and effective, they will be assessed in the monthly inspection. If all procedures are being conducted as outlined in this Plan, this will be noted accordingly on the inspection form. If repairs are required or process improvements can be made, this will be noted on the inspection form and a timeline for repairs and improvements will be outlined. Inspections will be performed by Al Woodruff, Environmental Manager, or his designee.

The inspection form is enclosed as Attachment A.

7.0 Training

Training is a critical component to the fugitive dust control plan. Training will include a review of the work activities and job site conditions that create dust, proper use of equipment and best management practices to prevent and control dust, and when to take corrective action. All employees will be trained annually.

8.0 Recordkeeping/Reporting

All inspection records will be kept in the office of the Environmental Manager and will be made available to ADEM upon request. All records will be kept for a minimum of five (5) years.

9.0 Record of Revisions and Updates

This Fugitive Dust Control Plan will be assessed annually. As part of the assessment, all processes and procedures will be reviewed for their effectiveness and efficiency at minimizing or eliminating the generation of fugitive dust. If any new measures have been implemented during the year, these will be incorporated into the plan.

The record is enclosed as Attachment B.

Attachment A

Inspection Log

Fugitive Dust Site Inspection Form

Inspection Criteria	Observations	Follow-Up Action	Status	Inspection Initials
Is visible dust observed? If so, where?				
Is facility well maintained (i.e., good housekeeping, area cleaned up?)				
Are proper control measures used (e.g., sweeper, water truck, etc.)?				
Are vehicles moving below speed limit?				
Are appropriate haul sizes maintained on haul vehicles (if applicable)?				
Are storage pile heights maintained below level of windbreak (if applicable)?				
Are low drop heights maintained for material handling activity?				

Attachment B

Record of Revisions and Updates

