

Air Enforcement: Alabama Department of Environmental Management and Chambers County Strandboard Manufacturing Facility Enter into Consent Order



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The Alabama Department of Environmental Management (“ADEM”) and West Fraser US EWP LLC (“West Fraser”) entered into a November 6th Consent Order (“CO”) addressing alleged violations of an air permit. See Consent Order No. 25-XXX-CAP.

The CO provides that West Fraser owns and operates an Oriented Strandboard manufacturing facility in Chambers County, Alabama.

The facility operates pursuant to an air permit.

ADEM is stated to have received on June 28, 2023, a self-disclosure letter on behalf of West Fraser stating that the emission factors used in the facility’s air permits were outdated. It further stated that the facility may need to be permitted as a major source of HAP. In addition, it stated that the facility may be subject to 40 C.F.R. 63 Subpart DDDD and 40 C.F.R. Subpart DDDDD (Boiler MACT).

ADEM is stated to have received the results of stack tests on November 27, 2023, that had been performed at the facility. Such stack tests for BGHS1 indicated a PM average for 0.37 lb/hr and a VOC average of 2.54 lb/hr, both of which exceeded the applicable emission limits for this unit.

Test results for BGHS7 indicated a PM average of 0.17 lb/hr and a VOC average of 4.26 lb/hr, both of which exceeded the applicable emission limits for this unit.

Test results for BGHS9 indicated a PM average of 0.13 lb/hr, which exceeded the applicable emission limit for that unit.

ADEM is stated to have issued a Notice of Violation (“NOV”) to West Fraser for failure to comply with the applicable PM and VOC emission limits in the applicable air permits. West Fraser acknowledged the facility’s poor status/non-compliance and stated that the facility was working to prepare a permit application with updated emission factors that will more accurately reflect its current operating conditions.

ADEM is stated to have received the results of stack tests performed at the facility on May 7-8, 2024. Test results for the ESP stack are stated to have indicated a NOx average 55.89 lb/hr, which exceeded the applicable emissions limit for this unit. Further, ADEM received the results of the stack test performed at

the facility on May 30-31, 2024, which indicated a VOC average of 2.26 lb/hr, exceeding the applicable emissions limit for this unit.

ADEM received on August 22, 2024, air permit applications from West Fraser to have the facility permitted as a major source of HAP. The applications are stated to indicate that the facility would be subject to PCWP MACT and the Boiler MACT.

West Fraser neither admits nor denies ADEM's contentions.

The company further indicates that it purchased the facility from a prior owner and conducted an environmental assessment. It identified and voluntarily self-disclosed to ADEM the inaccuracies of the emission factors used to prepare the permit applications for the air emissions sources at the facility. The inaccurate emission factors are the basis for the exceedance of the permitted emission limits.

West Fraser also states that it did not:

- Improperly operate or fail to properly maintain the emissions sources that are the subject of the CO.
- Gain any economic benefit as a result of the exceedances of the permitted emission limits.

The actual air emissions from the exceedances are stated to have been very low and did not cause irreparable harm to the environment or create a threat to the health or safety of the public. Further, electronic pressure drop gauges have been installed to improve monitoring of the function of the baghouses and it is has and will continue to cooperate with ADEM.

A civil penalty of \$160,000.00 is assessed.

A copy of the CO can be downloaded [here](#).