# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

## TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Hood Industries Inc, Waynesboro 915 Industrial Park Road Waynesboro, Mississippi Wayne County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

#### MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

#### AUTHORIZED SIGNATURE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: <u>June 21<sup>st</sup>, 2016</u>

#### Modified:

Permit No.: 2840-00004

Draft/Proposed

#### **SECTION 1**

#### A. GENERAL CONDITIONS

- 1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
- 3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. 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 does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

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- 10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
- 11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)
- 12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)
- 14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
  - a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
  - b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions. (Ref.: Miss. Code Ann. 49-17-21)
- 15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
  - a) Persistent violation of any of the terms or conditions of this permit;
  - b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

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- 16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
- 17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B)
- 18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
- 19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
- 20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 21. Beginning Operation: Except as prohibited in Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 22. Application for a Permit to Operate: Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

- 24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to "net" out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
- 25. General Duty: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 26. Deviation Reporting: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 27. Compliance Testing: Regarding compliance testing:
  - a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
  - b) Compliance testing will be performed at the expense of the permittee.
  - c) Each emission sampling and analysis report shall include but not be limited to the following:
    - (1) detailed description of testing procedures;
    - (2) sample calculation(s);
    - (3) results; and
    - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

#### **B.** GENERAL NOTIFICATION REQUIREMENTS

- 1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- 3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)
- 4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

#### SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

| Emission Point | Description   |  |  |
|----------------|---|--|--|
| AA-001         | Woodwaste Boiler (rated at 100 MMBTU/hr) with a Multi-cyclone (not for pollution control)   |  |  |
| AA-007         | Planer Mill equipped with Cyclone   |  |  |
| AA-008         | Hog/Trimmer equipped with Cyclone; Controls emissions from AA-015   |  |  |
| AA-009         | Solid Fuel Silo for AA-013 equipped with Cyclone  |  |  |
| AA-011         | Steam-heated Lumber Kiln  |  |  |
| AA-013         | Direct-Fired Batch Lumber Dry Kiln  |  |  |
| AA-014         | Direct-Fired Continuous Lumber Dry Kiln   |  |  |
| AA-015         | Solid Fuel Silo for AA-014 equipped with Cyclone; Emissions are routed to AA-008  |  |  |
| AA-016         | Surge Bin for AA-014 equipped with Cyclone  |  |  |
| AA-017         | Emergency Generator with Diesel Fired Compression Ignition Emergency Stationary Internal<br>Combustion 4-stroke Engine (130 hp/97 kW) |  |  |

#### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

| Emission<br>Point(s)                           | Applicable Requirement   | Condition<br>Number(s) | Pollutant/<br>Parameter | Limit/Standard  |  |
|--|--|------------------------|-------------------------|---|--|
| Facility<br>Wide                               | 11 Miss. Admin. Code Pt. 2,<br>R.1.3(A)1   | 3.1                    | Opacity                 | $\leq$ 40% except during startup  |  |
|  | 40 CFR Part 63, Subpart<br>DDDDD- National Emission<br>Standards for Hazardous Air<br>Pollutants for Major Sources:<br>Industrial, Commercial, and<br>Institutional Boilers and Process<br>Heaters<br>40 CFR 63.7485, 63.7490, | 3.2                    | HAPs                    | General Applicability   |  |
|  | 63.7495(b), 63.7499(h) and (l))  |                        | Filterable<br>PM        | 0.44 lb/MMBTU of heat input or 0.55 lb/MMBTU of steam output  |  |
| AA-001   | 40 CFR 63.7510(a), Subpart<br>DDDDD - Table 2  | 3.3                    | CO                      | 3,500 ppm by volume on a dry basis corrected to 3 9<br>oxygen, 3-run average (or 900 ppm by volume on a<br>dry basis corrected to 3% oxygen, 30-day rolling<br>average) |  |
|  |  |                        | Hg                      | 0.0000057 lb/MMBTU of heat input or 0.0000064 lb/MMBTU of steam output  |  |
|  |  |                        | HCl                     | 0.022 lb/MMBTU of heat input or 0.025 lb/MMBTU of steam output  |  |
|  | 11 Miss. Admin. Code Pt. 2,<br>R.1.3.D(2)  | 3.4 and 3.5            | РМ                      | 0.30 grains per dry standard cubic foot   |  |
|  | 11 Miss. Admin. Code Pt. 2,<br>R.1.4.A(1)  | 3.6                    | $SO_2$                  | 4.8 lbs/MMBTU   |  |
|  | Federally enforceable limit<br>established in Permit to<br>Construct issued June 21, 2016,<br>modified herein  | 3.7                    | Steam<br>Production     | 257,400,000 lbs of steam per year, on a 12-month rolling basis.   |  |
| AA-014<br>AA-015<br>AA-016                     | 11 Miss. Admin. Code Pt. 2,<br>R.2.2.B(10)   | 3.8                    |                         | Authorization to construct  |  |
| AA-007<br>AA-008<br>AA-009<br>AA-015<br>AA-016 | 11 Miss. Admin. Code Pt. 2,<br>R.1.3.F(1).   | 3.9                    |                         | $E = 4.1p^{0.67}$   |  |

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| Emission<br>Point(s)       | Applicable Requirement   | Condition<br>Number(s) | Pollutant/<br>Parameter            | Limit/Standard   |
|----------------------------|--|------------------------|------------------------------------|--|
| AA-011<br>AA-013<br>AA-014 | Federally enforceable limit<br>established in Permit to<br>Construct issued June 21, 2016<br>and modified herein | 3.10                   | Kiln-dried<br>lumber<br>production | AA-011: 66,000 MBF/year, on a 12-month rolling<br>basis.<br>AA-013: 61,440 MBF/year, on a 12-month rolling<br>basis.<br>AA-014: 87,560 MBF/year, on a 12-month rolling<br>basis. |
| AA-011<br>AA-013<br>AA-014 | 40 CFR 63.2231, Subpart<br>DDDD  | 3.11                   | HAPs                               | General Applicability  |
| 4.4.012                    | 11 Miss. Admin. Code Pt. 2,<br>R.1.4.B(1)  | 3.12                   | $SO_2$                             | ≤ 500 ppm  |
| AA-013<br>AA-014           | 11 Miss. Admin. Code Pt. 2,<br>R.2.2.B(10)   | 3.13                   | Fuel<br>Restriction                | Woodwaste is defined as sawdust, bark, green chips,<br>dry chips, ends, plywood trim, and planer shavings.   |

3.1. For all Emission Points, the permittee shall have emissions of Opacity less than or equal to 40 % as determined by EPA Test Method 9 as found in 40 CFR Part 60 Appendix A.

The permittee shall limit emissions during startup which exceed 40% opacity to fifteen minutes per startup in any one hour and not to exceed three startups per stack in any twenty-four hour period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3(A))

- 3.2. Emission Point AA-001 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. Emission Point AA-001 is an existing large boiler that is in the "hybrid suspension/grate burner designed to burn wet biomass/bio-based solid" fuel subcategory as listed in 40 CFR 63.7499(h) and as defined in 63.7575. (Ref.: 40 CFR 63.7485, 63.7490, 63.7495(b), 63.7499(h) and (l), Subpart DDDDD)
- 3.3. The permittee shall operate and maintain Emission Point AA-001, including any associated pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. For Emission Point AA-001, the emission limits in Table 2, work practice standards in Table 3, and operating limits in Table 4 of Subpart DDDDD of Part 63 apply at all times the emission point is in operation, except during startup and shutdown. (Ref.: 40 CFR 63.7500(a)(3), 63.7500(f), and 63.7505(a), Subpart DDDDD)
- 3.4. For Emission Points AA-001, the permittee shall use a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge derived from the facility's sawmill and/or planer mill as fuel. This fuel may be supplemented only by uncontaminated wood waste from off-site sources. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))

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- 3.5. For Emission Point AA-001, fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge, may be allowed emission rates up to 0.3 grains per dry standard cubic foot. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.D(2))
- 3.6. For Emission Point AA-001, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))
- 3.7. The maximum steam production from Emission Point AA-001, the woodwaste boiler, is limited to 257,400,000 lbs of steam per year, to be determined on a 12-month rolling basis. (Ref.: Federally enforceable limit established in Permit to Construct issued June 21, 2016, modified herein; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))
- 3.8. Beginning upon permit issuance date, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from:

| AA-014 | Direct-Fired Continuous Lumber Dry Kiln |
|--------|---|
| AA-015 | Solid Fuel Silo Cyclone for AA-014      |
| AA-016 | Surge Bin Cyclone for AA-014            |

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

3.9. For Emission Points AA-007, AA-008, AA-009, AA-015 and AA-016, the permittee shall not cause, permit or allow the emission of particulate matter in total quantities in any one hour, which includes any associated stacks, vents, outlets or combination thereof to exceed the amount determined by the relationship:

$$E = 4.1 p^{0.67}$$

Where:

*E* is the emission rate in pounds per hour

*p* is the process weight input rate in tons per hour

Where E is determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3(F))

3.10. The permittee is restricted to the following dry lumber production in any consecutive twelve (12) month period.

| AA-011 | 66,000 MBF/year |
|--------|-----------------|
| AA-013 | 61,440 MBF/year |
| AA-014 | 87,560 MBF/year |

(Ref.: Federally enforceable limit established in Permit to Construct issued June 21, 2016, modified herein; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))

3.11. The permittee is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD. Emission Points AA-011, AA-013 and AA-014 are affected sources per 40 CFR 63.2231(a) of the rule. However, the only applicable requirement is the initial notification. There are no other applicable monitoring, recordkeeping, or reporting requirements for these emission points in Subpart DDDD. (Ref.: 40 CFR 63.2231, Subpart DDDD)

- 3.12. For Emission Points AA-013 and AA-014, the permittee shall not cause or permit the emission of gas containing sulfur oxides (measured as Sulfur Dioxide) in excess of 500 ppm (volume) from any process equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.B(1))
- 3.13. For Emission Points AA-013 and AA-014, the permittee is authorized to burn as fuel only uncontaminated wood waste. For purposes of this permit, wood residue is defined as sawdust, bark, green chips, and planer shavings generated from the processing of harvested timber and may be purchased from outside sources. Additionally, the permittee is authorized to use startup fuel to ignite the fuel bed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

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#### SECTION 4 WORK PRACTICES

## THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION.

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| SECTION 5                                 |
|---|
| MONITORING AND RECORDKEEPING REQUIREMENTS |

| Emission<br>Point(s)                           | Applicable Requirement   | Monitoring/Recordkeeping<br>Requirement  | Condition<br>Number | Pollutant/Parameter<br>Monitored   |  |
|--|--|--|---------------------|--|--|
| Facility<br>Wide                               | 11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10)  | Monthly Records                          | 5.1                 | Maintenance Inspections  |  |
| AA-001   | 40 CFR Part 63, Subpart DDDDD-<br>National Emission Standards for<br>Hazardous Air Pollutants for Major<br>Sources: Industrial, Commercial, and<br>Institutional Boilers and Process<br>Heaters<br>(40 CFR 63.7510(a), 63.7515(a) and<br>(b), 63.7520(a),(b),(c),(d),and (e),<br>63.7530(a) and (b), 63.7545(d), and<br>Table 5) | Initial Compliance Testing               | 5.2                 | PM, HCl, Hg and CO   |  |
|  | 40 CFR 63. 7540(a)(1),(2)(ii), and(10)<br>and (b), Items 1 and 10 of Table 8,<br>Subpart DDDDD   | Continuous compliance                    | 5.3                 | PM, HCl, Hg and CO   |  |
|  | 11 Miss. Admin. Code Pt. 2, Ch. 2. R.Recording steam production,<br>on a 12-month rolling total  |  | 5.4                 |  |  |
|  | 40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD   | Recordkeeping                            | 5.5                 | Steam Production   |  |
| AA-001<br>AA-007<br>AA-008<br>AA-009<br>AA-016 | 11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10)  | Weekly Visible Emissions<br>Observations | 5.6                 | Opacity  |  |
| AA-011<br>AA-013<br>AA-014                     | 11 Miss. Admin. Code Pt. 2, R.<br>2.2.B(10)  | Monthly records                          | 5.7                 | Dry Lumber Production  |  |
| Facility<br>Wide                               | 40 CFR 52.21(r)(6)(iii), Subpart A   | Monitoring and Recordkeeping             | 5.8                 | PM, PM <sub>10</sub> , PM <sub>2.5</sub> ,<br>NOx, CO, VOC,<br>SO <sub>2</sub> , Pb, and SAM/<br>Actual Emission<br>Calculations |  |

5.1. For all pollution control equipment, maintenance inspections shall be performed each month, or more often as needed, and maintenance shall be performed as dictated by inspection results so that proper operation of the equipment is maintained. Records of any inspections and/or maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. The permittee shall have access at all times to sufficient equipment as

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is necessary to repair and/or replace the pollution control equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.2. For Emission Point AA-001, the permittee shall demonstrate initial compliance with the PM, CO, HCl and Hg limitations in Table 2 of 40 CFR Subpart DDDDD by stack testing and establishing operating limits. Stack testing must be performed in accordance with the requirements in 40 CFR 63.7520 and Table 5 of Subpart DDDDD by July 29, 2016, and submittal of the test report no later than sixty days after the testing is complete.

(Ref.: 40 CFR 63.7510(a)(1),(3), and (4), 63.7515(a) and (b), 63.7520(a),(b),(c),(d), and(e), 63.7530(a) and (b), 63.7545(d), and Table 5, Subpart DDDDD)

- 5.3. For Emission Point AA-001, the permittee shall demonstrate continuous compliance with the emission limits, the work practice standards and the operating limits according to the applicable methods specified in 40 CFR 63.7540 and Table 8 of Subpart DDDDD. (Ref.: 40 CFR 63. 7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8, Subpart DDDDD)
- 5.4. For Emission Point AA-001, the permittee shall record the amount of steam produced on a daily basis and calculate the 12-month rolling total. These records shall be maintained on site for at least five (5) years and shall be made available upon request to Office of Pollution Control personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.5. For Emission Point AA-001, the permittee must keep all applicable records required in 40 CFR 63.7555. (Ref.: 40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD)
- 5.6. For Emission Points AA-001, AA-007, AA-008, AA-009, and AA-016, the permittee shall perform weekly visual observations of the exhaust stack and keep records of each observation. If any visible emissions are detected which appear to be in excess of the applicable state regulation, then the permittee shall perform a visible emissions evaluation (VEE) using 40 CFR Part 60, Appendix A, Method 9. If VEE readings cannot be taken using Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. The permittee shall submit a summary report to MDEQ on a semi-annual basis. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.7. For Emission Points AA-011, AA-013 and AA-014, for each kiln separately, the permittee shall record the amount of lumber dried (in board-feet) on both a monthly basis and a total for each consecutive twelve (12) month period. These records shall be maintained on site for at least five (5) years and shall be made available upon request to Office of Pollution Control personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.8. The permittee shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project covered by this permit and calculate and maintain a record of the annual emissions, in tons/yr on a calendar year basis, for a period of ten (10) years following resumption of regular operations after the change. (Ref.: 40 CFR 52.21(r)(6)(iii))

#### SECTION 6 REPORTING REQUIREMENTS

| Emission<br>Point(s)      | Pollutant/Parameter<br>Monitored                       | Reporting Requirement     | Condition<br>Number | Applicable Requirement                       |
|---------------------------|--|---------------------------|---------------------|--|
| AA-001                    |  | Reporting                 | 6.1                 | 40 CFR 63.7550 and Table 9,<br>Subpart DDDDD |
| All<br>Emission<br>Points | Steam Production,<br>Dry Lumber<br>Production, Opacity | Submit semi-annual report | 6.2                 | 11Miss. Admin. Code Pt. 2,<br>R.2.B(10)      |

- 6.1. For Emission Point AA-001, the permittee must submit each applicable report in 40 CFR 63.7550 and Table 9 of Subpart DDDDD. (Ref.: 40 CFR 63.7550 and Table 9, Subpart DDDDD)
- 6.2. The permittee shall submit a semi-annual report summarizing:
  - a) the total amount of steam produced on a daily basis and the calculated total for a rolling twelve (12) month period for Emission Point AA-001;
  - b) the opacity observations for Emission Point AA-001, AA-007, AA-008, AA-009, AA-015 and AA-016;
  - c) for Emission Points AA-011, AA-013 and AA-014, for each kiln separately, the total amount of lumber dried each month and the total for each rolling twelve (12) month period.

The semi-annual reporting period shall be from January 1 to June 30 and July 1 to December 31. The report shall be submitted no later than January 31 and July 31 for the previous six-month period. (Ref.: 11Miss. Admin. Code Pt. 2, R.2.B(10))