

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Vicksburg Forest Products, LLC – Waltersville Lumber Mill  
1725 North Washington Street  
Vicksburg, Warren County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and 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.

**Permit Issued:**

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

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**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:**[Date not to exceed 5 years from issuance]

**Permit No.: 2780-00004**

## **TABLE OF CONTENTS**

SECTION 1. GENERAL CONDITIONS .....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES .....	14
SECTION 3. EMISSION LIMITATIONS & STANDARDS .....	15
SECTION 4. COMPLIANCE SCHEDULE .....	25
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS .....	26
SECTION 6. ALTERNATIVE OPERATING SCENARIOS .....	38
SECTION 7. TITLE VI REQUIREMENTS .....	39
 <b>APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT</b>	

## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(a).)

- 1.2 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 this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(b).)

- 1.3 This permit and/or any part thereof 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 does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(c).)

- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

- (a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no 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 the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) 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 the permit.
- (3) The Permit Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the MDEQ at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 1.5 The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ 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 MDEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to the MDEQ 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. 6.3.A.(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit or the application of any provision of this 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. 6.3.A.(5).)

- 1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order, which shall be issued in accordance with the procedure outlined in Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – *Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act*.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (*e.g.* air emission factors); or other approaches such as engineering calculations (*e.g.* estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.(2).)

- (d) The fee shall be due September 1<sup>st</sup> of each year. By July 1<sup>st</sup> of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the MDEQ by the first payment date of September 1<sup>st</sup>. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee,

the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(8).)

- 1.10 Any document required by this permit to be submitted to the MDEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the MDEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to perform the following:

- (a) Enter upon the permittee's premises where a Title V source is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C.(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I.(1).)

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I.(2).)

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F.(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F.(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the

completeness determination, the permittee fails to submit by the deadline specified in writing by the MDEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C.(2), R. 6.4.B., and R. 6.2.A.(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) The changes are not modifications under any provision of Title I of the Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:
  - (1) A brief description of the change(s);
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F.(1).)

1.19 Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 (*Regulations for the Prevention of Air Pollution Emergency Episodes*) for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – *Permit Regulations for the Construction and/or Operation of Air Emissions Equipment*, and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – *Air Emissions*

*Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act.* Modification is defined as “any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted”. A physical change or change in the method of operation shall not include:

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
  - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or
  - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166).
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C.(15).)

- 1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

- 1.22 This permit is a Federally-approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit

the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B.(1).)

- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvi-cultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:
- (a) Except as otherwise specified herein, an “*emergency*” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions

specified in Part (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;

- (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

- 1.27 Regarding compliance testing (if applicable):
- (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).)

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

EMISSION POINT	DESCRIPTION
AA-100	Facility-Wide (Vicksburg Forest Products, LLC – Waltersville Lumber Mill)
AA-001	Pneumatic Wood Waste Handling System [includes one (1) baghouse and one (1) fuel bin cyclone; emissions generated from the Planer Mill and the fuel bin cyclone are routed to the baghouse; wood shavings from the Planer Mill and the particulate matter collected within the baghouse are routed to a fuel bin for the 94.8 MMBTU / Hour Wood Waste-Fired Boiler via the fuel bin cyclone]
AA-002	94.8 MMBTU / Hour Wood Waste-Fired Boiler [construction commenced in November 1988]
AA-004	Temporary Boilers [limited to a maximum of two (2) units only during periods of shutdown for the 94.8 MMBTU / Hour Wood Waste-Fired Boiler; Maximum Heat Input Capacity (by fuel): Natural Gas – 65.0 MMBTU / Hour, No. 2 Fuel Oil – 48.72 MMBTU / Hour]
AA-006	Sawmill Operations [includes log debarking, sawing, bark hogging, wood chipping, and grinding]
AA-007	Haul Roads
AA-009	Lumber Chemical Treatment Station [includes (but not limited to) the application of fungicide, insecticide, and/or iron stain inhibitor solution(s) on dried dimensional lumber]
AA-010	Miscellaneous Coating Operations [includes (but not limited to) logo painting, edge sealing, and grade stamping]
AA-013	Truck Load-Out Operations [includes the receipt, conveyance, and loading of material collected at the bottom of the Wood Waste Handling System's baghouse and wood waste generated from Sawmill Operations into trucks for off-site shipment; Loading Throughput Capacity: 20 Tons / Hour]
AK-001 through AK-028	Twenty-Eight (28) Indirect-Fired, Steam-Heated Lumber Drying Kilns [each drying kiln has the ability to dry both green hardwood and softwood lumber]

### **SECTION 3. EMISSION LIMITATIONS & STANDARDS**

#### **A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS**

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing or industrial process, which exceeds forty percent (40%) opacity subject to the exceptions provided in Parts (a) and (b) below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any 1 hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Limit(s) / Standard(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.B.1	PM (filterable only)	$E = 4.1(p^{0.67})$
	Federally Enforceable Permit to Construct Issued on October 3, 2018 <b>(Major Source Avoidance Limit)</b>	3.B.2	HAPs	9.90 tpy (Individual) 24.90 tpy (Total) (Rolling 52-Week Period)
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.B.3	SO <sub>2</sub>	4.8 Pounds / MMBTU Heat Input
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).	3.B.4	PM	0.30 Grains / Dry Standard Cubic Foot
	Federally Enforceable Permit to Construct Issued on October 3, 2018	3.B.5	Fuel Source	Combust Uncontaminated Wood Waste
	40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63.11193; Subpart JJJJJ	3.B.6	HAPs	Applicability
	Federally Enforceable Permit to Construct Issued on May 24, 1988 and Modified on September 17, 1999	3.B.7	(a) PM	45.6 Pounds / Hour 199.7 tpy (Rolling 12-Month Total)
			(b) NO <sub>x</sub>	30.0 Pounds / Hour 131.4 tpy (Rolling 12-Month Total)
			(c) SO <sub>2</sub>	2.3 Pounds / Hour 10.1 tpy (Rolling 12-Month Total)
			(d) CO	23.2 Pounds / Hour 101.6 tpy (Rolling 12-Month Total)
			(e) VOCs	8.0 Pounds / Hour 36.0 tpy (Rolling 12-Month Period)
AA-004	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1).	3.B.8	PM	0.6 pounds / MMBTU per hour, or $E = 0.8808(I^{-0.1667})$

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
AA-004	Federally Enforceable Permit to Construct Issued on July 26, 1994; Modified by Title V Operating Permit Issued on April 13, 2005 and on Issuance Date Herein  11 Miss. Admin. Code Pt. 2, R. 2.15.C.  40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units  40 CFR 60.41c; Subpart Dc	3.B.9	PM SO <sub>2</sub>	Operate No More Than Two (2) Temporary Boilers During Periods of Shutdown for Emission Point AA-002  Comply with “ <i>Temporary Boiler</i> ” Definition
	Federally Enforceable Permit to Construct Issued on July 26, 1994; Modified by Title V Operating Permit Issued on April 13, 2005 and on Issuance Date Herein  11 Miss. Admin. Code Pt. 2, R. 2.15.C <sub>2</sub>	3.B.10	Operational / Emission Standards	Operate Temporary Boiler(s) in Accordance with Emission Standards and Applicable Operating Scenario(s)
AK-001 through AK-028	Federally Enforceable Permit to Construct Issued on October 3, 2018 <b>(PSD Avoidance Limit)</b>	3.B.11	Dried Lumber Throughput	115,000.0 MBF Softwood Per Year (for Combined Kilns; Rolling 12-Month Total)
	Federally Enforceable Permit to Construct Issued on October 3, 2018	3.B.12	Final Moisture Content (Softwood)	≥ 12%

- 3.B.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

Where “*E*” is the emission rate in pounds per hour and “*p*” is the process weight input rate in tons per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).)

- 3.B.2 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of any individual hazardous air pollutant (HAP) from all applicable process equipment to

no more than 9.9 tons per year (tpy) based on a rolling 52-week period. Additionally, the permittee shall limit the emission of all HAPs in total from all applicable process equipment to no more than 24.9 tpy based on a rolling 52-week period.

(Ref.: Federally Enforceable Permit to Construct Issued on October 3, 2018 – Major Source Avoidance Limit)

- 3.B.3 For Emission Points AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler) and AA-004 (Temporary Boilers), except as otherwise specified or limited herein, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide or SO<sub>2</sub>) per million BTU (MMBTU) heat input from an applicable process unit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).)

- 3.B.4 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), except as otherwise specified or limited herein, the permittee is allowed to emit particulate matter (PM) at a rate up to 0.30 grains per dry standard cubic foot from the boiler.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).)

- 3.B.5 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall only combust “uncontaminated wood waste” within the boiler. For the purpose of this permit, “*uncontaminated wood waste*” is defined as any by-product generated from processing harvested timber / dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition.

(Ref.: Federally Enforceable Permit to Construct Issued on October 3, 2018)

- 3.B.6 Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler) is subject to and shall comply with applicable requirements found within 40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

Emission Point AA-002 is an existing boiler in the “*biomass*” subcategory as listed in 40 CFR 63.11200(b), Subpart JJJJJ and as defined in 40 CFR 63.11237, Subpart JJJJJ.

(Ref.: 40 CFR 63.11193; Subpart JJJJJ)

- 3.B.7 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall limit the emission of the following pollutants from the boiler in pounds per hour and in tons per year (tpy) (based on a rolling 12-month total):

Pollutant	Pounds Per Hour	Tons Per Year
(a) Particulate Matter (PM)	45.6	199.7
(b) Nitrogen Oxides (NO <sub>x</sub> )	30.0	131.4
(c) Sulfur Dioxide (SO <sub>2</sub> )	2.3	10.1
(d) Carbon Monoxide (CO)	23.2	101.6
(e) Volatile Organic Compounds (VOCs)	8.0	36.0

(Ref.: Federally Enforceable Permit to Construct Issued on May 24, 1988 and Modified on September 17, 1999)

3.B.8 For Emission Point AA-004 (Temporary Boilers), except as otherwise specified or limited herein, the permittee shall comply with one of the following particulate matter emission limitations for each boiler (as applicable):

- (a) For a boiler that combusts a fossil fuel and has a maximum heat input of less than ten (10) million BTU (MMBTU) per hour, the permittee shall not exceed 0.6 pounds per MMBTU per hour heat input; or
- (b) For a boiler that combusts a fossil fuel and has a maximum heat input equal to / greater than 10 MMBTU per hour heat input but less than 10,000 MMBTU per hour heat input, the permittee shall not exceed an emission rate as determined by the following relationship:

$$E = 0.8808(I^{-0.1667})$$

Where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1).)

3.B.9 For Emission Point AA-004 (Temporary Boilers), the permittee is authorized to operate a maximum of two (2) temporary boilers only during periods of shutdown for Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler).

For the purpose of this permit, a “*temporary boiler*” is defined as a steam generating unit that combusts natural gas or distillate oil (i.e. fuel oil) with a potential sulfur

dioxide (SO<sub>2</sub>) emission rate no greater than 0.060 pounds per MMBTU, and the unit is designed to (and is capable of) being carried or moved from one location to another. A steam generating unit is not a “*temporary boiler*” if any of the following conditions exist:

- (a) The equipment is attached to a foundation.
- (b) The steam generating unit (or a replacement) remains at a location for more than one hundred eighty (180) consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period.
- (c) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least two (2) years, and operates at that facility for at least three (3) months each year.
- (d) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.

(Ref.: Federally Enforceable Permit to Construct Issued on July 26, 1994; Modified by Title V Operating Permit Issued on April 13, 2005 and on Issuance Date Herein per 11 Miss. Admin. Code Pt. 2, R. 2.15.C.)  
(Ref.: 40 CFR 60.41c; Subpart Dc – “*Temporary boiler*”)

3.B.10 For Emission Point AA-004 (Temporary Boilers), the permittee shall operate a maximum of two (2) temporary boilers in accordance with the following emissions limitations and operational restrictions (as applicable):

- (a) The permittee shall limit the emission of the following pollutants from a temporary boiler both in pounds per hour and in tons per year (tpy) (based on a rolling 12-month total):

Pollutant	Pounds Per Hour	Tons Per Year
(1) PM / PM <sub>10</sub> Combined	0.696	1.33
(2) Sulfur Dioxide (SO <sub>2</sub> )	34.71	38.98
(3) Nitrogen Oxides (NO <sub>x</sub> )	6.96	29.88
(4) Carbon Monoxide (CO)	1.74	7.47
(5) Volatile Organic Compounds (VOCs)	0.283	1.25

- (b) *Operating Scenario 1 (Natural Gas Fuel)*: For any temporary boiler that combusts natural gas as the primary fuel source, the permittee shall comply with the following operational restrictions:
- (1) The maximum combined heat input capacity for all temporary natural gas-fired boilers shall not exceed 65.0 MMBTU per hour; and
  - (2) The permittee shall comply with the opacity limitations specified in Condition 3.A.1.
- (c) *Operating Scenario 2 (No. 2 Fuel Oil)*: For any temporary boiler that combusts No. 2 fuel oil as the primary fuel source, the permittee shall comply with the following operational restrictions:
- (1) The maximum combined heat input capacity for all temporary fuel oil-fired boilers shall not exceed 48.72 MMBTU per hour;
  - (2) The maximum combined No. 2 fuel oil usage shall not exceed 1,098,592 gallons per year based on a rolling 365-day period;
  - (3) The permittee shall only combust No. 2 fuel oil that contains no more than five hundred (500) parts per million (ppm); and
  - (4) The permittee shall comply with the opacity limitations specified in Condition 3.A.1.

(Ref.: Federally Enforceable Permit to Construct Issued on July 26, 1994; Modified by Title V Operating Permit Issued on April 13, 2005 and on Issuance Date Herein per 11 Miss. Admin. Code Pt. 2, R. 2.15.C.)

- 3.B.11 For Emission Points AK-001 through AK-028 (Indirect-Fired Lumber Drying Kilns), the permittee shall limit the total throughput of softwood lumber dried in the combined lumber drying kilns to no more than 115,000.0 thousand board feet (MBF) [115.0 million board feet (MMBF)] per year based on a rolling 12-month period.

(Ref.: Federally Enforceable Permit to Construct Issued on October 3, 2018 – PSD Avoidance Limit)

- 3.B.12 For Emission Points AK-001 through AK-028 (Indirect-Fired Lumber Drying Kilns), the permittee shall limit the final moisture content of dried softwood lumber produced within each lumber drying kiln to twelve percent (12%) or greater.

(Ref.: Federally Enforceable Permit to Construct Issued on October 3, 2018)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement(s)	Condition Number(s)	Pollutant(s) / Parameter(s)	Limit(s) / Standard(s)
11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.C.1	PM	0.6 pounds / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.C.2	PM (filterable only)	$E = 4.1(p^{0.67})$
11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.C.3	SO <sub>2</sub>	4.8 pounds / MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning emission sources of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).)

- 3.C.2 Except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).)

- 3.C.3 The maximum discharge of sulfur oxides from any fuel burning emission source 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 or SO<sub>2</sub>) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).)

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Work Practice Standard(s)
AA-002	40 CFR 63.11205(a); Subpart JJJJJ	3.D.1	HAPs	General Duty Clause
	40 CFR 63.11223(b); Subpart JJJJJ	3.D.2	CO HAPs	Conduct Biennial Performance Tune-Ups

- 3.D.1 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall operate and maintain the boiler (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.

The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boiler.

(Ref.: 40 CFR 63.11205(a); Subpart JJJJJ)

- 3.D.2 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall conduct and record a performance tune-up on the boiler biennially no later than twenty-five (25) months after the previously completed tune-up. Each tune-up shall be conducted in accordance with the following provisions:

- (a) Inspect the burner (as applicable) and clean / replace any components of the burner as necessary. A burner inspection may be delayed until the next boiler shutdown but shall not to exceed thirty-six (36) months after the previous inspection.
- (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. An adjustment should be consistent with the manufacturer's specifications (if available).
- (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. An inspection may be delayed until the next boiler shutdown but shall not to exceed 36 months after the previous inspection.

- (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxide (NO<sub>x</sub>) requirement to which a boiler is subject.
- (e) Measure the concentrations in the effluent stream of CO in parts per million by volume (ppm<sub>v</sub>) and oxygen (O<sub>2</sub>) in volume percent (vol.%) before and after the adjustments are made. The measurements may be either on a wet or dry basis as long as the basis remains the same before and after the adjustments are made. The measurements may be taken using a portable CO analyzer.
- (f) The permittee shall document and maintain on-site the following information collected during a tune-up:
  - (1) The date of the tune-up;
  - (2) The procedures followed for the tune-up;
  - (3) The manufacturer's specifications to which the boiler was tuned;
  - (4) The concentration of CO in the effluent stream in ppm<sub>v</sub> and O<sub>2</sub> in vol.% measured at high fire or the typical operating load before and after the tune-up of a boiler;
  - (5) A description of any corrective action taken as a part of the tune-up of a boiler; and
  - (6) The type and amount of fuel used over the last twelve (12) months prior to tune-up of a boiler but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- (g) If a boiler is not operating on the required date for the tune-up, the permittee shall conduct the tune-up within thirty (30) days of start-up.

(Ref.: 40 CFR 63.11223(b) and 40 CFR 63.11225(c)(2)(i); Subpart JJJJJ)

## **SECTION 4. COMPLIANCE SCHEDULE**

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31<sup>st</sup> for the preceding calendar year. Each compliance certification shall include the following:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent;
  - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period; and
  - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C.(5)(a), (c), and (d).)

## **SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

### **A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(b)(1).)

- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(b)(2).)

- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> for the preceding six-month period. 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 consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

- 5.A.5 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) days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the MDEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

**B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s)</b>	<b>Monitoring / Recordkeeping Requirement(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	HAPs	Calculate and Record Emissions (Weekly; Rolling 52-Week Total)
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	Opacity	Perform and Record Weekly Visible Emission Observations
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.B.3	PM / PM <sub>10</sub>	Perform and Record Weekly Inspections / Maintenance Actions on Air Pollution Control Equipment
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.4		Monitor and Record the Differential Pressure Drop Daily
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	5.B.5	PM NO <sub>x</sub> CO	Conduct Routine Performance Stack Testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.6	Steam Production	Calculate and Record Steam Production (Weekly Average; Rolling 52-Week Total)
	40 CFR 63.11225(c)(4) and (5); Subpart JJJJJ	5.B.7	HAPs	Record Information Pertaining to Periods of Boiler Malfunction
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.8	Sulfur Content Fuel Usage	Monitor and Record Fuel Oil-Related Data
AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.9	HAPs	Monitor and Record Chemical Specifications and Usage Data
AA-010	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.10	HAPs	Monitor and Record Material Specifications and Usage Data
AK-001 through AK-028	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.11	VOCs HAPs	Monitor and Maintain the Throughput for Dried Softwood and Hardwood Lumber from All Kilns (Weekly; Rolling 52-Week Total)
		5.B.12	Final Moisture Content	Monitor and Record Moisture Content of Dried Lumber Processed in Planer Mill (Rolling 52-Week Average)

- 5.B.1 For Emission Point AA-100 (Facility-Wide), the permittee shall calculate and record the emission of any individual hazardous air pollutant (HAP) and all HAPs in total from all applicable operations and/or process units both weekly and on a rolling 52-week total.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate calculated emissions (*e.g.* engineering judgement determinations, operational data, applicable emission factors, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.2 For Emission Points AA-001 (Wood Waste Handling System) and AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall perform and record a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of the baghouse and the boiler during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, a visible emission evaluation (VEE) in accordance with EPA Test Method 9 shall then be performed and recorded by certified personnel. The overall observation period for a VEE shall consist of (at a minimum) eighteen (18) consecutive minutes. However, if visible emissions observed after an initial period of six (6) consecutive minutes are determined to be no more than twenty percent (20%) opacity, the certified individual may discontinue the VEE. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations were conducted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.3 For Emission Point AA-001 (Wood Waste Handling System), the permittee shall perform and record an inspection of the baghouse and the fuel bin cyclone weekly to note any required maintenance.

If a problem is noted with either the baghouse or the fuel bin cyclone during an inspection, the permittee shall perform the necessary maintenance on the applicable unit to ensure operation as originally designed. Additionally, the permittee shall maintain on-site sufficient components as is necessary to repair the applicable equipment.

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

- 5.B.4 For Emission Point AA-001 (Wood Waste Handling System), the permittee shall monitor and record the differential pressure drop on the baghouse daily to demonstrate that the pressure drop does not exceed 2.0 inches of water.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.5 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall demonstrate compliance with the respective particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) hourly emission limitations outlined in Condition 3.B.7 by conducting a performance stack testing in accordance with the following specifications:

- (a) All performance testing shall be conducted in accordance with either applicable EPA-approved test methods (found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, and Appendix A of 40 CFR Part 63), or an alternative test method approved by the MDEQ and/or the EPA prior to the testing event.
- (b) The permittee shall conduct a performance stack test at representative operating load conditions. “*Representative load conditions*” shall be defined as the operation of the boiler under heat input rates that that will be typical in the future. The MDEQ may require the permittee to retest if the heat input rate of the boiler exceeds ten percent (10%) of the representative load conditions that occurred during a previously completed test.
- (c) The permittee shall conduct a minimum of three (3) separate test runs for each performance stack test as specified in 40 CFR 63.7(e)(3); Subpart A.
- (d) *For the particulate matter (PM) and nitrogen oxides (NO<sub>x</sub>) pollutants:* The permittee shall conduct performance stack testing once every five (5) years and no later than sixty-one (61) months after the previously completed test for the applicable pollutant.
- (e) *For the carbon monoxide (CO) pollutant:* If the results from the previous performance test indicate that CO emissions are equal to or less than fifty percent (50%) of the emission limit (i.e.  $\leq 11.6$  pounds per hour based on a 3-hour block average), the permittee shall conduct testing once every 5 years and no later than 61 months after the previously completed test.

If the results from the previous performance test indicate that CO emissions are greater than 50% of the emission limit (i.e.  $> 11.6$  pounds per hour based on a 3-hour average), the permittee shall conduct performance stack testing biennially and no later than twenty-five (25) months after the previously completed test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 5.B.6 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall calculate and record the total quantity of steam generated from the boiler based on a weekly average and on a rolling 52-week total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.7 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall record the following information for the boiler as it pertains to periods of malfunction:

- (a) Any occurrence and the corresponding duration of each malfunction, or the associated air pollution control / monitoring equipment; and
- (b) Any action(s) taken during periods of malfunction to minimize emissions in accordance with Condition 3.D.1, which includes corrective actions to restore the malfunctioning boiler or the associated air pollution control / monitoring equipment to its normal / usual manner of operation.

(Ref.: 40 CFR 63.11225(c)(4) and (5); Subpart JJJJJ)

- 5.B.8 For Emission Point AA-004 (Temporary Boilers), upon start-up of a temporary boiler that combusts No. 2 fuel oil, the permittee shall monitor and record the following information:

- (a) Documentation that identifies the sulfur content / concentration of the fuel oil being combusted; and
- (b) The volume (in gallons) of fuel oil combusted both daily and on a rolling 365-day total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.9 For Emission Point AA-009 (Lumber Chemical Treatment Station), the permittee shall monitor and record the weekly usage (in gallons) of any chemical used in the lumber treatment process (insecticides; fungicides; inhibitor solutions; etc.) that contain a hazardous air pollutant (HAP).

Additionally the permittee shall maintain corresponding documentation for each chemical used in the lumber treatment process that identifies the following information:

- (a) Product name and identification;
- (b) The density (in pounds per gallon); and
- (c) The weight percentage (wt.%) of each individual HAP.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.10 For Emission Point AA-010 (Miscellaneous Coating Operations), the permittee shall monitor and record the weekly usage (in gallons) of any material used in lumber coating operations (inks; sealants; etc.) that contain a hazardous air pollutant (HAP).

Additionally the permittee shall maintain corresponding documentation for each material used in lumber coating operations that identifies the following information:

- (a) Product name and identification;
- (b) The density (in pounds per gallon); and
- (c) The weight percentage (wt.%) of each individual HAP.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.11 For Emission Points AK-001 through AK-028 (Lumber Drying Kilns), the permittee shall monitor and record the respective throughput of softwood and hardwood dried in the collective lumber drying kilns in thousand board feet (MBF) both weekly and on a rolling 52-week period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.12 For Emission Points AK-001 through AK-028 (Lumber Drying Kilns), the permittee shall demonstrate compliance with the moisture limitation specified in Condition 3.B.13 by monitoring and recording the final moisture content of dried softwood lumber processed through the planer mill based on a rolling 52-week average.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

**C. SPECIFIC REPORTING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement(s)</b>	<b>Condition Number</b>	<b>Pollutant(s) / Parameter(s) Monitored</b>	<b>Reporting Requirement(s)</b>
AA-100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.1	HAPs	Submit a Semi-Annual Report for Emissions
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.2	PM	Submit Semi-Annual Summary on Maintenance Actions
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.6.B.(5).	5.C.3	PM NO <sub>x</sub> CO	Submit Performance Testing Protocol Submit 10-Day Notification of Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.4		Submit Performance Testing Results
	40 CFR 63.11225(b)(1) and (2); Subpart JJJJJ	5.C.5	HAPs	Submit Biennial Certification of Compliance
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.6	Steam Generation	Submit a Semi-Annual Report on Weekly Production
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.7	Temporary Boiler Usage	Submit Notification on Impending Usage of a Temporary Boiler and Boiler-Related Data
		5.C.8		Submit Notifications Related on Temporary Boiler Start-Up and On-Site Removal
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.9	Fuel Oil Usage Sulfur Content	Submit Semi-Annual Report on Daily Fuel Usage and Sulfur Content (Fuel Oil)
AA-009 AA-010	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.10	HAPs	Submit a Semi-Annual Report on Materials and Chemicals Used in Applicable Processes
AK-001 through AK-028	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.11	VOCs HAPs	Submit Semi-Annual Report on Weekly Throughput of Dried Hardwood Lumber and Dried Softwood Lumber
	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.12	Final Moisture Content	Submit Annual Certification on Final Moisture Content for Dried Softwood Processed through the Planer Mill

5.C.1 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 that summarizes the respective emission of

individual hazardous air pollutants (HAPs) and all HAPs combined both weekly and on a rolling 52-week period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

- 5.C.2 For Emission Point AA-001 (Wood Waste Handling System), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 that summarizes any maintenance actions performed on either the baghouse or fuel bin cyclone. Additionally, the permittee shall include within the report the date and corresponding duration (in hours) in which the baghouse and/or the fuel bin cyclone was non-operational.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

- 5.C.3 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall submit a written protocol for any testing required by Conditions 5.B.5 and 5.B.6 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended date.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the written protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B.(5).)

- 5.C.4 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall submit a report in accordance with Condition 27 of Section 1 that details the results of any performance stack testing to the MDEQ no later than sixty (60) days after actual testing event.

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

- 5.C.5 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall prepare and submit a compliance certification by March 15<sup>th</sup> of the immediate year following the completion of a performance tune-up for each boiler. The report shall contain (at a minimum) the following information:

- (a) The company name and address;
- (b) A statement by the Responsible Official (which includes the official's name, title, phone number, e-mail address, and signature) that certifies the truth, accuracy,

and completeness of this notification as well as a statement of whether a boiler has compiled with all the applicable standards and requirements found in 40 CFR Part 63, Subpart JJJJJJ.

Additionally, the notification shall also include the following certifications of compliance:

- (1) *“This facility complies with the requirements in 40 CFR § 63.11223 to conduct a biennial tune-up each boiler unit”;*
- (2) *“This facility complies with the requirement in 40 CFR 63.11214(d) and 40 CFR 63.11223(g) to minimize the boiler’s time spent during start-up and shutdown and to conduct start-ups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if the manufacturer’s recommended procedures are not available.”*

(Ref.: 40 CFR 63.11225(b)(1) and (2); Subpart JJJJJJ)

- 5.C.6 For Emission Point AA-002 (94.8 MMBTU / Hour Wood Waste-Fired Boiler), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 that summarizes the quantity (in pounds) of steam produced on a rolling 52-week period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

- 5.C.7 For Emission Point AA-004 (Temporary Boilers), the permittee shall notify the MDEQ in writing about the intent to install and operate a temporary boiler no later than thirty (30) days prior to its on-site arrival. Additionally, the permittee shall include with this notification the following information:

- (a) The maximum heat input capacity of each boiler;
- (b) The primary fuel source to be combusted within each boiler; and
- (c) The projected duration (in days) in which each temporary boiler will be operated.

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

- 5.C.8 For Emission Point AA-004 (Temporary Boilers), the permittee shall notify the MDEQ in writing of the following events no later than fifteen (15) days after the actual date:

- (a) The actual start-up of a temporary boiler; and
- (b) The removal of a temporary boiler from on-site.

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

5.C.9 For Emission Point AA-004 (Temporary Boilers), if the permittee operates a temporary boiler that combusts No. 2 fuel oil as the primary fuel source, the permittee shall submit a report in conjunction with the semi-annual monitoring report (SMR) for the corresponding period that details the following information:

- (a) The volume (in gallons) of fuel oil combusted daily in a temporary boiler; and
- (b) The sulfur content of each fuel oil shipment that is combusted.

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

5.C.10 For Emission Points AA-009 (Lumber Chemical Treatment Station) and AA-010 Miscellaneous Coating Operations), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 that details the following information for any chemical used in the lumber treatment process and any material used in the lumber coating process:

- (a) Product name and identification;
- (b) The quantity used (in gallons) of each chemical or material on a rolling 52-week period; and
- (c) The percentage of any individual hazardous air pollutant (HAP) and all HAPs in total (by weight);

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

5.C.11 For Emission Points AK-001 through AK-028 (Indirect-Fired Lumber Drying Kilns), the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 that details the respective total throughput of dried softwood lumber and dried hardwood lumber from the combined drying kilns in thousand board feet (MBF) per year based on a rolling 52-week period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

5.C.12 For Emission Points AK-001 through AK-028 (Indirect-Fired Lumber Drying Kilns), the permittee shall submit an annual certification acknowledging that the dried softwood lumber processed through the planer mill complied with the final target moisture content of 12% or greater (based on a rolling 52-week average) no later than January 31<sup>st</sup> of each calendar year for the preceding year.

If the certification denotes non-compliance with the referenced final target moisture content limit, the permittee shall include with the annual certification an additional

report that details the number of excursions experienced within the calendar year and the duration of each excursion experienced.

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

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## **SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1 None permitted.

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## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or the MDEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless the EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

- (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.
- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

# APPENDIX A

## List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr / dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs. / hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound