



State of Mississippi

FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT



Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Sunbelt Shavings Company Inc
11922 Highway 21 39
Shuqualak, MS
Noxubee County

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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified:

Permit No. 2000-00042

Expires:

Agency Interest # 49987

*** Draft Permit ***

Table of Contents

Subject Item Inventory.....	i
Facility Requirements.....	1
General Information.....	A-1
Other Relevant Documents:	

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
 Subject Item Inventory
 Permit Number:2000-00042
 Activity ID No.: PER20110002

Subject Item Inventory:

ID	Designation	Description
AI49987	2000-00042	Pinewood Shavings Drying Process
CONT4	AA-001	Shavings Bin Cyclone (C-1)
CONT5	AA-002	Green Shavings Dryer Cyclone (C-2)
CONT3	AA-003	Fuel Bin Cyclone (C-3)
CONT2	AA-004	Fine Flake Shavings Bin Cyclone (C-4)
CONT1	AA-005	Alternate Dry Shavings Cyclone (C-5)
EQPT1	AA-006	Biomass Suspension Burner which exhausts to the Green Shavings Dryer Cyclone (AA-002), except for periods of start-up
AREA1	AA-100	Pinewood Shavings Drying Process (fugitive emissions)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

*** Draft Permit ***

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 1 of 19

AI0000049987 (2000-00042) Pinewood Shavings Drying Process:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	For the entire facility the permittee shall have emissions of Particulate Matter ≤ 96.0 tons/yr. This is considered a filterable particulate matter limitation. The test method used to determine filterable PM emissions shall measure total PM mass and the mass of PM with a diameter of 10 microns and less, unless the permittee chooses to assume all of the total filterable PM to be 10 microns or less. Should the permittee use this assumption and the stack test results show total PM emissions greater than any of the filterable PM permit limits established herein, MDEQ shall assume the emission point is out of compliance with all fractions of PM for which the stack test showed an exceedance. [APC-S-2 II.B(10)] This requirement is applicable during the following months: Jan-Dec. Statistical basis: Annual Maximum.
L-2	Particulate Matter	Particulate Matter: For the entire facility, the permittee shall not allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, 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 and p is the process weight input rate in tons per hour. [APC-S-1 3.6(a)]
L-3	Particulate Matter (10 microns or less)	For the entire facility the permittee shall have emissions of Particulate Matter (10 microns or less) ≤ 96 tons/yr. This is considered a filterable particulate matter limitation. The test method used to determine filterable PM emissions shall measure total PM mass and the mass of PM with a diameter of 10 microns and less, unless the permittee chooses to assume all of the total filterable PM to be 10 microns or less. Should the permittee use this assumption and the stack test results show total PM emissions greater than any of the filterable PM permit limits established herein, MDEQ shall assume the emission point is out of compliance with all fractions of PM for which the stack test showed an exceedance. [APC-S-2 II.B(10)] This requirement is applicable during the following months: Jan-Dec. Statistical basis: Annual Maximum.
L-4	VOC	For the entire facility, the permittee shall have emissions of VOC ≤ 96.0 tons/yr. [APC-S-2 II.B(10)] This requirement is applicable during the following months: Jan-Dec. Statistical basis: Annual Maximum.
L-5		The maximum throughput of the facility shall not exceed 86,486 tons of green logs per year, as determined for each consecutive 12-month period. [APC-S-2 II.B(10)]

*** Draft Permit ***

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 2 of 19

AI0000049987 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For the entire facility, the permittee shall maintain records of the total monthly tons of logs used for production in the shavings process. Records shall be maintained of each consecutive twelve (12) month total and shall be submitted as part of the annual monitoring report required by S-2 on page 2 of this permit. [APC-S-2 II.B(10)]

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: 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. [APC-S-2 II.B(10)]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually by the 31st of January. This report shall address any required monitoring specified in the permit. This report shall include a demonstration that the facility complied with the tons/yr limitations for PM, PM10, and VOC as specified in conditions L-1, L-3, and L-4 on page 1 of the permit. [APC-S-2 II.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	Any exceedance of the limitations outlined in this permit shall be reported to MDEQ no later than seven (7) days following the occurrence. [APC-S-2 II.B(10)]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-3	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [APC-S-2 V.A]

*** Draft Permit ***

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 3 of 19

AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-4	General Condition: Solids removed in the course of control of air emissions shall 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. [Miss. Code Ann. 49-17-29 1.a(i and ii)]
T-5	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 10]
T-6	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [APC-S-2 X]
T-7	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the 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 emission. [Miss. Code Ann. 49-17-21]
T-8	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any 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 any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]
T-9	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this 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 condition of the permit. [APC-S-2 II.B(15)b]
T-10	General Condition: 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. [Miss. Code Ann. 49-17-39]

*** Draft Permit ***

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 4 of 19

AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-11	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [APC-S-2 II.B(15)c]
T-12	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [APC-S-2 II.B(7)]
T-13	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-14	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-15	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.D]
T-16	General Condition: 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. [APC-S-2 I.D(7)]
T-17	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [APC-S-2 II.B(15)d]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 5 of 19

AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-18	<p>General Condition: This permit does not authorize a modification as defined in APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or 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:</p> <ul style="list-style-type: none">(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: (i) 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 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 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 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or(f) any change in ownership of the stationary source" [APC-S-2 I.D(2)]
T-19	<p>General Condition: 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 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. [APC-S-2 II.B(15)a]</p>
T-20	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports 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 or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [APC-S-2 IX]</p>
T-21	<p>General Condition: 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 constructing or operating without a valid permit. [APC-S-2 II.B(5)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 6 of 19

AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-22	<p>General Condition: Emergencies</p> <p>(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 noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) 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 (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [APC-S-2 II.B(10)]</p>
T-23	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [APC-S-1 Section 10]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 7 of 19

AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-25	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [APC-S-1 Section 10]</p>
T-26	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [APC-S-2 VIII]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 8 of 19

CONT0000000004 (AA-001) Shavings Bin Cyclone (C-1):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-001 (the dry shavings bin cyclone, C-1), the permittee shall assure accuracy of PM and PM10 emission factors used in the facility's SMOP application by stack testing in accordance with EPA Approved Methods and the procedures outlined below:</p> <ul style="list-style-type: none">a. The performance test shall be conducted WITHIN ONE YEAR AFTER the issuance date of this permit.b. The test must be conducted in accordance with test methods specified within this permit or by an approved equivalent method.c. Testing must be performed at the maximum capacity of the system or at a capacity representative of its normal operation if maximum capacity cannot be achieved.d. A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the office of pollution control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.e. A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s)f. The performance test results must be submitted to the Office of Pollution Control (OPC) within 45 days following the performance testg. The performance test results shall include a comparison of the short term emission factors used in the facility's permit application and the performance test results. If short term emission factors from the permit application are exceeded, the facility shall demonstrate how compliance with ton/yr emission limitations shall be maintained. [APC-S-2 II.B(10)]
M-2		<p>For the equipment associated with Emission Point AA-001, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. A written or electronic log of the date, time, and person who performed the inspection shall be maintained on site.</p> <p>The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
Facility Requirements
Permit Number:2000-00042
Activity ID No.: PER20110002

CONT0000000004 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-3		For Emission Point AA-001, the permittee shall conduct weekly inspections for visible emissions. If visible emissions are observed from the emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. The permittee shall maintain records of weekly visible emissions inspections and results of any Method 9 observations performed in a written or electronic log. A summary report shall be submitted annually in accordance with condition S-2 on page 2 of the permit. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	Beginning on date of issuance, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-001, the shavings bin cyclone (C-1). The air emissions equipment shall be operated to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 10 of 19

CONT0000000005 (AA-002) Green Shavings Dryer Cyclone (C-2):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-002, the permittee shall assure accuracy of PM, PM10, NOx, CO and VOC emission factors used in the facility's SMOP application by stack testing in accordance with EPA Test Methods 1-5, 7, 10, and 25 or 25A respectively and the procedures outlined below:</p> <ol style="list-style-type: none">The performance test shall be performed within ONE YEAR AFTER issuance of this permit.The test must be conducted in accordance with test methods specified within this permit or by an approved equivalent method.Testing must be performed at the maximum capacity of the system or at a capacity representative of its normal operation if maximum capacity cannot be achieved.A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the office of pollution control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s)The performance test results must be submitted to the Office of Pollution Control (OPC) within 45 days following the performance testThe performance test results shall include a comparison of the short term emission factors used in the facility's permit application and the performance test results. If short term emission factors from the permit application are exceeded, the facility shall demonstrate how compliance with ton/yr emission limitations shall be maintained. [APC-S-2 II.B(10)]
M-2		<p>For the equipment associated with Emission Point AA-002, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. A written or electronic log of the date, time, and person who performed the inspection shall be maintained on site.</p> <p>The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
Facility Requirements
Permit Number:2000-00042
Activity ID No.: PER20110002

CONT0000000005 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-3		For Emission Point AA-002, the permittee shall conduct weekly inspections for visible emissions. If visible emissions are observed from the emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. The permittee shall maintain records of weekly visible emissions inspections and results of any Method 9 observations that are performed in a written or electronic log. A summary report shall be submitted annually in accordance with condition S-2 on page 2 of the permit. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	Beginning on the permit issuance date, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-002, the green shavings dryer cyclone (C-2) The air emissions equipment shall be operated in a manner in order to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 12 of 19

CONT0000000003 (AA-003) Fuel Bin Cyclone (C-3):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-003 (the fuel bin cyclone, C-3), the permittee shall assure accuracy of PM and PM10 emission factors used in the facility's SMOP application by stack testing in accordance with Oregon Method 8 or other appropriate EPA Approved Test Methods and the procedures outlined below:</p> <ol style="list-style-type: none">The performance test shall be conducted WITHIN ONE YEAR AFTER the issuance date of this permit.The test must be conducted in accordance with test methods specified within this permit or by an approved equivalent method.Testing must be performed at the maximum capacity of the system or at a capacity representative of its normal operation if maximum capacity cannot be achieved.A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the office of pollution control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s)The performance test results must be submitted to the Office of Pollution Control (OPC) within 45 days following the performance testThe performance test results shall include a comparison of the short term emission factors used in the facility's permit application and the performance test results. If short term emission factors from the permit application are exceeded, the facility shall demonstrate how compliance with ton/yr emission limitations shall be maintained. [APC-S-2 II.B(10)]
M-2		<p>For the equipment associated with Emission Point AA-003, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. A written or electronic log of the date, time, and person who performed the inspection shall be maintained on site.</p> <p>The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 13 of 19

CONT0000000003 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-3		For Emission Point AA-003, the permittee shall conduct weekly inspections for visible emissions. If visible emissions are observed from the emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. The permittee shall maintain records of weekly visible emissions inspections and results of any Method 9 observations performed in a written or electronic log. A summary report shall be submitted annually, in accordance with Condition S-2 on page 2 of the permit. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning upon the permit issuance date, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-003, the Fuel Bin Cyclone.</p> <p>The air emissions equipment shall be operated in a manner which complies with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
Facility Requirements
Permit Number:2000-00042
Activity ID No.: PER20110002

Page 14 of 19

CONT000000002 (AA-004) Fine Flake Shavings Bin Cyclone (C-4):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-004 (the fine flake shavings bin cyclone, C-4), the permittee shall assure accuracy of PM and PM10 emission factors used in the facility's SMOP application by stack testing in accordance with EPA Approved Methods and the procedures outlined below:</p> <ol style="list-style-type: none">The performance test shall be conducted WITHIN ONE YEAR AFTER the issuance date of this permit.The test must be conducted in accordance with test methods specified within this permit or by an approved equivalent method.Testing must be performed at the maximum capacity of the system or at a capacity representative of its normal operation if maximum capacity cannot be achieved.A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the office of pollution control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s)The performance test results must be submitted to the Office of Pollution Control (OPC) within 45 days following the performance testThe performance test results shall include a comparison of the short term emission factors used in the facility's permit application and the performance test results. If short term emission factors from the permit application are exceeded, the facility shall demonstrate how compliance with ton/yr emission limitations shall be maintained. [APC-S-2 II.B(10)]
M-2		<p>For Emission Point AA-004, the permittee shall conduct weekly inspections for visible emissions. If visible emissions are observed from the emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. The permittee shall maintain records of weekly visible emissions inspections and results of any Method 9 observations that are performed in a written or electronic log. A summary report shall be submitted annually, in accordance with Condition S-2 of page 2 of the permit. [APC-S-2 II.B(10)]</p>
M-3		<p>For the equipment associated with Emission Point AA-004, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment.</p> <p>The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. [APC-S-2 II.B(10)]</p>

*** Draft Permit ***

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
Facility Requirements
Permit Number:2000-00042
Activity ID No.: PER20110002

CONT0000000002 (continued):

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning upon issuance date of this permit, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-004, the Fine Flake Shavings Bin Cyclone.</p> <p>The air emissions equipment shall be operated in a manner which complies with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 16 of 19

CONT0000000001 (AA-005) Alternate Dry Shavings Cyclone (C-5):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-005 (the alternate dry shavings cyclone, C-5), the permittee shall assure accuracy of the PM and PM10 emission factors used in the facility's SMOP application by stack testing in accordance with EPA Approved Methods and the procedures outlined below:</p> <ul style="list-style-type: none">a. The performance test shall be conducted WITHIN ONE YEAR AFTER the issuance date of this permit or within 180 DAYS of initial operation of the cyclone, whichever is later.b. The test must be conducted in accordance with test methods specified within this permit or by an approved equivalent method.c. Testing must be performed at the maximum capacity of the system or at a capacity representative of its normal operation if maximum capacity cannot be achieved.d. A written test protocol must be submitted at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the office of pollution control. If needed, the permittee may request a pretest conference to discuss the test methods and procedures. The pretest conference should be scheduled at least thirty (30) days prior to the test date.e. A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s)f. The performance test results must be submitted to the Office of Pollution Control (OPC) within 45 days following the performance testg. The performance test results shall include a comparison of the short term emission factors used in the facility's permit application and the performance test results. If short term emission factors from the permit application are exceeded, the facility shall demonstrate how compliance with ton/yr emission limitations shall be maintained. [APC-S-2 II.B(10)]
M-2		<p>For the equipment associated with Emission Point AA-005, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. A written or electronic log of the date, time, and person who performed the inspection shall be maintained on ste.</p> <p>The permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 17 of 19

CONT0000000001 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-3		Upon startup of Emission Point AA-005, the permittee shall conduct weekly inspections for visible emissions. If visible emissions are observed from the emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. The permittee shall maintain records of weekly visible emissions inspections and results of any Method 9 observations performed in a written or electronic log. A summary report shall be submitted annually, in accordance with condition S-2 on page 2 of the permit. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning upon issuance date of this permit, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-005, the Alternate Dry Shavings Cyclone.</p> <p>The air emissions equipment shall be operated in a manner which complies with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc

Facility Requirements

Permit Number:2000-00042

Activity ID No.: PER20110002

Page 18 of 19

EQPT0000000001 (AA-006) Biomass Suspension Burner which exhausts to the Green Shavings Dryer Cyclone (AA-002), except for periods of start-up:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	<p>Opacity: For Emission Point AA-006, the permittee shall be limited to an opacity of 40% as determined by EPA Test Method 9 and 40 CFR 60, Appendix A.</p> <p>The permittee may produce emissions which exceed 40% opacity for fifteen (15) minutes per startup in any one hour, not exceed three (3) startups per stack in any twenty-four (24) hour period. [APC-S-1 3.1]</p>

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-006 the permittee shall conduct an analysis of the wood fuel to determine the heat content value in BTU per pound of the wood fuel combusted, using three representative samples. The analysis shall be performed in conjunction with the stack test required for Emission Point AA-002 by condition M-1 on page 10 of 19 of this permit. The permittee shall submit the results of this analysis as part of the stack test report.</p> <p>The results of the wood fuel analysis shall also be used in place of estimated values for heat content values wherever appropriate in calculations for the facility. [APC-S-2 II.B(10)]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Sunbelt Shavings Company Inc
Facility Requirements
Permit Number:2000-00042
Activity ID No.: PER20110002

EQPT0000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-006, the permittee shall quantify emissions of PM, PM10, and VOC generated during periods of startup and shutdown. These emissions shall be included in calculations to demonstrate compliance with ton/yr facilitywide limitations. A summary of these emissions calculations shall be submitted to MDEQ as part of the annual certification required by condition S-2 on page 2 of this permit. [APC-S-2]

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning upon issuance of this permit, the permittee is authorized to operate air emissions equipment for the emission of air contaminants for Emission Point AA-006, the 34 MMBTU/Hr Biomass Suspension Burner with exhaust (S-5) for startup.</p> <p>The air emissions equipment shall be operated in a manner which complies with the emission limitations and monitoring requirements specified elsewhere in this permit. [APC-S-2 II.B(10)]</p>

GENERAL INFORMATION

Sunbelt Shavings Company Inc
11922 Highway 21 39
Shuqualak, MS
Noxubee County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
49987	Shuqualak Lumber Company, Sunbelt Shavings Company Inc	Official Site Name	8/27/2009	
200000042	Sunbelt Shavings Company Inc	Air-Construction	11/20/2009	
2810300042	Sunbelt Shavings Company, Inc	Air-AIRS AFS	11/20/2009	

Basin: Tombigbee River Basin

Location Description:

*** Draft Permit ***