



State of Mississippi



AIR POLLUTION CONTROL PERMIT

To Construct Air Emissions Equipment

THIS CERTIFIES

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

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

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified:

Expires:

Permit No. 2000-00042

Agency Interest # 49987

***** Draft Permit *****

To Construct Air Emissions Equipment

Sunbelt Shavings Company Inc

Subject Item Inventory

Permit Number 2000-00042

Activity ID No.: PER20110001

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 (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

To Construct Air Emissions Equipment

Sunbelt Shavings Company Inc
 Facility Requirements
 Permit Number 2000-00042
 Activity ID No.: PER20110001

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 \leq 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-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) \leq 96 tons/yr. [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 \leq 96.0 tons/yr as determined by EPA Test Method. [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. [APC-S-2 II.B(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Upon certification of construction and commencement of operation, the permittee shall maintain record of the total monthly tons of logs received at the facility for production in the shavings process. Records should be maintained on a consecutive twelve (12) month rolling total. [APC-S-2 II.B(10)]

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 Facility Requirements
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AI0000049987 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [APC-S-2 V.D]</p>
S-2	<p>Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [APC-S-2 V.C(2)]</p>
S-3	<p>The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(3)]</p>
S-4	<p>Upon certification of construction and commencement of operation, a summary of any recordkeeping required by this permit must be submitted to this office on an annual basis. The reports shall be postmarked no later than thirty (30) days following the annual reporting periods ending December 31. [APC-S-2 II.B(10)]</p>

Narrative Requirements:

Condition No.	Condition
T-1	<p>General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [APC-S-2 V.A]</p>
T-2	<p>General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]</p>

To Construct Air Emissions Equipment

Sunbelt Shavings Company Inc

Facility Requirements

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AI0000049987 (continued):

Narrative Requirements:

General Condition:

Condition No.	Condition
T-3	<p>General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]</p>
T-4	<p>General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 10]</p>
T-5	<p>General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials:</p> <ul style="list-style-type: none">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; andb. 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-6	<p>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 good cause shown including, but not limited to, the following: a. Persistent 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 requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [APC-S-2 II.C]</p>
T-7	<p>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]</p>

Condition No. Condition

T-8 General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D.]

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To Construct Air Emissions Equipment

Sumbelt Shavings Company Inc
Facility Requirements
Permit Number 2000-00042
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AI000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-9	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 operating without a valid permit pursuant to State Law. [APC-S-2 II.B(5)]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [APC-S-2 I.D(6)]
T-11	General Condition: The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. [APC-S-2 II.B(7)]
T-12	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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [APC-S-2 II.B(15)a]
T-13	General Condition: The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [APC-S-2 II.B(15)b]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [APC-S-2 II.B(15)c]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [APC-S-2 II.B(15)d]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [APC-S-2 XVI.B]
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [APC-S-2 I.D(7)]

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To Construct Air Emissions Equipment
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Permit Number 2000-00042
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AI0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-18	<p>General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [APC-S-2 V.C(1)]</p>
T-19	<p>General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [APC-S-2 V.D(3)]</p>
T-20	<p>General Condition: Except as prohibited in APC-S-2, Section V.D.7, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [APC-S-2 V.D(4)]</p>
T-21	<p>General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [APC-S-2 V.D(5)]</p>
T-22	<p>General Condition: Except as otherwise specified in APC-S-2, Section V.D.7, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [APC-S-2 V.D(6)]</p>
T-23	<p>General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [APC-S-2 V.D(7)]</p>

To Construct Air Emissions Equipment
Sunbelt Shavings Company Inc
Facility Requirements
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AJ0000049987 (continued):

Narrative Requirements:

Condition No.	Condition
T-24	<p>General Condition: Regarding compliance testing:</p> <p>(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.</p> <p>(b) Compliance testing will be performed at the expense of the permittee.</p> <p>(c) Each emission sampling and analysis report shall include but not be limited to the following:</p> <ol style="list-style-type: none"> 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. [APC-S-2 VI.B(3, 4 and 6)]
T-25	<p>General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [APC-S-2 V.A.(4)]</p>
T-26	<p>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)]</p>

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Facility Requirements

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Activity ID No.: PER20110001

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 demonstrate compliance with PM and PM10 emission limitations by stack testing in accordance with EPA Approved Oregon Method 8 and the procedures outlined below:</p> <ul style="list-style-type: none"> a. The initial performance test shall be performed within 180 DAYS AFTER initial start-up of permitted equipment. 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 notification of intent to conduct the performance test must be submitted to the Office of Pollution Control sixty (60) days prior to the scheduled test date. e. 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. f. 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) g. The performance test results must be submitted to the Office of Pollution Control (OPC) within 60 days following compliance demonstration test. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-001, the shavings bin cyclone (C-1).</p> <p>The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]</p>

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Facility Requirements

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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 demonstrate compliance with PM, PM10, NOx, CO and VOC emission limitations by stack testing in accordance with EPA Approved Oregon Method 8, EPA Test Methods 7, 10, and 25 or 25A respectively and the procedures outlined below:</p> <ul style="list-style-type: none"> a. The initial performance test shall be performed within 180 DAYS AFTER initial start-up of permitted equipment. 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 notification of intent to conduct the performance test must be submitted to the Office of Pollution Control sixty (60) days prior to the scheduled test date. e. 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. f. 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) g. The performance test results must be submitted to the Office of Pollution Control (OPC) within 60 days following compliance demonstration test. [APC-S-2 II.B(10)]

Narrative Requirements:

Condition No.	Condition
T-1	<p>Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-002, the green shavings dryer cyclone (C-2)</p> <p>The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]</p>

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Sunbelt Shavings Company Inc

Facility Requirements

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CONT000000000003 (AA-003) Fuel Bin Cyclone (C-3):

Narrative Requirements:

Condition No.	Condition
T-1	Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-003, the Fuel Bin Cyclone. The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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Sunbelt Shavings Company Inc
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CONT0000000002 (AA-004) Fine Flake Shavings Bin Cyclone (C-4):

Narrative Requirements:

Condition No.	Condition
T-1	<p data-bbox="570 130 646 1803">Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-004, the Fine Flake Shavings Bin Cyclone.</p> <p data-bbox="662 130 761 1803">The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]</p>

To Construct Air Emissions Equipment
Sunbelt Shavings Company Inc
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CONT0000000001 (AA-005) Alternate Dry Shavings Cyclone (C-5):

Narrative Requirements:

Condition No.	Condition
T-1	Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-005, the Alternate Dry Shavings Cyclone.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

To Construct Air Emissions Equipment
Sunbelt Shavings Company Inc
 Facility Requirements
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EQPT0000000001 (AA-006) Biomass Suspension Burner which exhausts to the Green Shavings Dryer (AA-002), except for periods of start-up:
Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	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.

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]

Narrative Requirements:

Condition No.	Condition
T-1	Beginning on November 20, 2009, the permittee is authorized to construct air emissions equipment for the emission of air contaminants for Emission Point AA-001, the 34 MMBTU/Hr Biomass Suspension Burner with exhaust (S-5) for startup.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified elsewhere in this permit. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [APC-S-2 II.B(10)]

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 ***