**INFORMATION RELATIVE TO**

**THE DRAFT TITLE V OPERATING PERMIT**

**November 5, 2018**

FOR:

**Weyerhaeuser NR Company, Bruce Facility**

**289 South Pontotoc Road**

**Bruce, MS 38915**

FACILITY DESCRIPTION

Weyerhaeuser NR Company, Bruce Facility operates an existing dimensional lumber wood product mill that includes a sawmill, lumber kilns, and a planer mill. The facility is located at 106 Railroad Street, in Bruce MS, (662) 983-7311 and has applied to the Mississippi Department of Environmental Quality for the renewal of their current Title V Permit to Operate Air Emissions Equipment Ref. No. 0300-00032. The facility operations fall under the Standard Industrial Classification (SIC) Code 2421.

The facility added two direct-fired lumber kilns (AA-018 and AA-019) and associated woodwaste fuel bins (AA-020 and AA-021) in a Permit to Construct issued September 4, 2014 and the units were modified in a PSD Construction Permit issued April 1, 2016.

As part of the construction project, the following equipment and activities were taken out of service: 70 MMBtu/hr Woodwaste Boiler (AA-001), 115 MMBtu/hr Woodwaste Boiler (AA-002), Four Lumber Dry Kilns (AA-003) and Ash Handling (AA-013). Also, the PM emission limitations were removed for the Truck Chip Bins Cyclone (AA-004), Planer Cyclone (AA-005) and #1 Planer Shavings Truck Bin Cyclone (AA-006). These changes have been incorporated in the proposed TV Permit renewal.

TITLE V PROGRAM APPLICABILITY BASIS

The facility’s potential-to-emit exceeds the Title V threshold limits of 100 tons/year of each of the following criteria air pollutants: Volatile Organic Compounds. The facility has the potential to emit more than 25 TPY of Total HAPs and/or 10 TPY of a single HAP. This facility is a major source with the regard to PSD regulations because their VOC emissions exceed the 250 TPY PSD threshold.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS

The State and Federally-enforceable conditions of Title V Operating Permits are based upon the requirements of the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (11 Miss. Admin. Code Pt. 2, Ch. 6.), and applicable requirements effective upon the date of permit issuance. Applicable requirement means all of the following as they apply to emissions units in a Title V source:

1. any standard or other requirement set forth in the State Implementation Plan (SIP) approved or promulgated by EPA through rulemaking under Title I of the Federal Clean Air Act (Federal Act) including the following:

a. most of the State of Mississippi Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (11 Miss. Admin. Code Pt. 2, Ch. 1.)

b. the State of Mississippi Regulations for the Prevention of Air Pollution Emergency Episodes (11 Miss. Admin. Code Pt. 2, Ch. 3.),

c. the State of Mississippi Regulations for the Prevention of Significant Deterioration of Air Quality (11 Miss. Admin. Code Pt. 2, Ch. 5.), and 40 CFR Part 52.21 by reference, and

d. the provisions of the State of Mississippi Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (11 Miss. Admin. Code Pt. 2, Ch. 2.), relating to construction permits and synthetic minor operating permits;

2. any term or condition of any construction permits issued pursuant to Mississippi regulations approved or promulgated through rulemaking under Title I;

3. any standard or other requirement under Section 111 of the Federal Act, including Section 111(d) which includes Title 40, Part 60 of the Code of Federal Regulations (40 CFR Part 60) and relevant sections of 11 Miss. Admin. Code Pt. 2, Ch. 1.;

4. any standard or other requirement under Section 112 of the Federal Act, including relevant sections of 11 Miss. Admin. Code Pt. 2, Ch. 1.and 40 CFR Parts 61, 63, and 68;

5. any standard or other requirement of the acid rain program under Title IV of the Federal Act or the regulations promulgated thereunder, including the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act (11 Miss. Admin. Code Pt. 2, Ch. 7.) adopted November 17, 1994, and 40 CFR Parts 72, 73, 75, 77, and 78;

6. any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Federal Act;

7. any standard or other requirement governing solid waste incineration under Section 129 of the Federal Act;

8. any standard or other requirement for consumer and commercial products under Section 183(e) of the Federal Act;

9. any standard or other requirement for tank vessels under Section 183(f) of the Federal Act;

10. any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the Federal Act;

11. any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Federal Act;

12. any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Federal Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 11 Miss. Admin. Code Pt. 2, Ch. 6.or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

CAM APPLICABILITY

CAM applies to those units which use a control device to achieve compliance with an emission limit and where the pre-controlled emissions from the unit exceed major source thresholds. Since Boiler No. 2 (Emission Point AA-002) is out of service, CAM requirements no longer apply.

MACT APPLICABILITY

Emission Points AA-018 and AA-019 are affected sources, as defined in 40 CFR 63.2231 (a) of 40 CFR 63 Subpart DDDD- National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. The only requirement found in the rule for these kilns was the initial notification form, which has already been submitted to MDEQ. There are no emission limits, recordkeeping, or reporting requirements in Subpart DDDD that are applicable to these kilns.

The facility is subject to 40 CFR 63 Subpart ZZZZ-National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines because it has an existing CI RICE (AA-017) for an emergency fire pump.

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

The facility is no longer subject to the requirements of NSPS Subpart Dc, Standards of Performance for Institutional Steam Generating Unitsfor the 115 MMBtu/hr Woodwaste Boiler (Emission Point AA-002), since it was taken out of service.

SPECIFIC APPLICABLE REQUIREMENTS

In the PSD Construction Permit issued April 1, 2016, the PM limits were removed for Emission Points AA-004 (Truck Chip Bins Cyclone), AA-005 (#1 Planer Cyclone) and AA-006 (#1 Planer Shavings Truck Bin Cyclone). The throughput for the cyclones is limited to the drying capacity of the kilns. Also, the facility had shown a large margin of compliance with their PM limitations through performance stack tests.

The Entire Facility, including Emission Points AA-004 (Truck Chip Bins Cyclone), AA-005 (Planer Cyclone), AA-006 ( #1 Planer Shavings Truck Bin Cyclone), AA-020 and AA-021 (Fuel Bin Cyclones for kilns AA-018 and AA-019 respectively), is subject to a 40% opacity limit. The facility will be required to perform monthly maintenance inspections on the facility’s cyclones and monthly opacity readings and visible emission evaluation (VEE) if emissions are observed.

| **EMISSION LIMITS** | | | |
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| Emission Point No. | Pollutant | Draft Permit Emission Limits | Monitoring Requirements |
| AA-000 | Opacity | 40% | Monthly visual observations will be performed on each cyclone in the facility and VEE if needed.  Monthly maintenance inspections shall be performed on the cyclones in the facility. |
| PM | E=4.1\*(p)0.67 |
| AA-017 | PM | 0.6 lbs./MMBTU | No monitoring due to large margin of compliance. The unit will be used during emergencies, 50 hr of non-emergencies and required maintenance. |
| AA-018  AA-019 | SO2 | 500 ppm (volume) | No monitoring due to large margin of compliance. Due to the low sulfur content of wood waste, emissions are expected to be minimal. |
| VOC | 621.5 tons/yr | Develop and implement a kiln-specific inspection and maintenance plan to ensure Good Work Practices  Monitor throughput (maximum 275,000 thousand board-feet per year) |