**INFORMATION RELATIVE TO**

**THE DRAFT TITLE V OPERATING PERMIT**

**September 9, 2019**

FOR:

**J T Shannon Lumber Company**

**2200 Cole Road**

**Horn Lake, Mississippi**

FACILITY DESCRIPTION

The J T Shannon Lumber Company operates a sawmill and lumber kiln whose products range from wood flooring to architectural molding. The facility consists of significant sources of emissions from fourteen (14) dry kilns, one (1) 28.7 MMBTU/hr wood-fired boiler, one (1) 0.06 MMBTU/hr wood-fired backup boiler, painting operations, two (2) cyclones, one (1) baghouse, and fugitive emissions from sawdust and wood scrap handling activities.

TITLE V PROGRAM APPLICABILITY BASIS

The facility is a major source as defined by Title V of the Federal Clean Air Act due to its potential to emit more than 100 tons per year (tpy) of Particulate Matter of ten microns or less (PM10). The facility does not have the potential to emit more than 25 tons per year of total hazardous air pollutants (HAP) or more than 10 tons per year of any individual HAP. Therefore, the facility is classified as an Area Source with respect to HAP emissions. The potential emissions of PM10 from the existing equipment at the facility is less than 250 tpy and hence the facility is considered an existing Minor Source for PSD purposes.

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

There is no control equipment associated with any emission units subject to an emission limit or standard at this facility, so 40 CFR 64 Compliance Assurance Monitoring does not apply.

MODIFICATIONS

Emission Point AA-023 has been removed from the permit. All activities associated with the former strip mill have been discontinued and removed from operation.

No other physical changes have been denoted at the facility since the previous permitting action. Performance stack testing for PM for Emission Point AA-012 has been included on a 5-year basis to demonstrate compliance with the 0.3 gr/dscf PM limitation. The previous performance stack test was completed in 2013.

No other significant changes were made to the permit requirements for the facility.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) APPLICABILITY

The facility is an Area Source of Hazardous Air Pollutants (HAP) since the facility does not have the potential to emit more than 25 tons per year of total HAPs or 10 tpy of an individual HAP.

40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The facility is potentially subject to 40 CFR 63, Subpart JJJJJJ, and the facility’s “Industrial, Commercial, Institutional” (ICI) boilers could potentially be affected units. Emission Point AA-027 qualifies as an existing biomass-fired boiler that does not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio and is required by this subpart to conduct biennial tune ups. Emission Point AA-012 qualifies as an existing biomass-fired with an oxygen trim system that maintains an optimum air-to-fuel ratio and is required by this subpart to conduct tune ups every five years. The 1-time energy assessment has been completed for Emission Point AA-012. All applicable requirements have been incorporated into the permit.

NEW SOURCE PERFORMANCE STANDARDS (NSPS) APPLICABILITY

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Emission Point AA-012 is subject to NSPS Subpart Dc. The provisions of this subpart are applicable to steam generating units that are constructed after June 9, 1989, with a maximum design heat input capacity between 10-100 MMBTU/hr. The boiler is rated at 28.7 MMBTUH and was constructed after the June 9, 1989 effective date. To comply with the requirements of this subpart, the facility must maintain monthly records of the quantity of fuel combusted and shall not combust fuel that contains greater than 0.5 weight percent sulfur. Additionally, the facility must maintain records of fuel type and quantity.

SPECIFIC APPLICABLE REQUIREMENTS

The facility denoted no insignificant activities in the permit renewal application. Specific requirements are tabularized below.

| Emission Point(s) | Pollutant / Parameter | Limit/Standard | Monitoring |
| --- | --- | --- | --- |
| AA-012 | PM | 0.3 gr/dscf | Performance Stack Testing |
| HAPs | Conduct boiler tune-up every 2 years | Work Practice standards |
| PM and SO2 | ≤ 0.5% Fuel Sulfur Content | Fuel usage |
| AA-027 | HAPs | Conduct boiler tune-up every 5 years | Work Practice standards |
| PM | 0.3 gr/dscf | Performance Stack Testing |
| AA-012  and  AA-027 | SO2 | 4.8 lb/MMBTU | None |
| Opacity | 40% | Visual observations |
| AA-002, AA-003,  and  AA-013 | PM | E = 4.1 p 0.67 | Weekly inspections |
| Opacity | 40% | Visual observation |
| PM | Operating Restriction | Operational Requirement |