



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Inca Presswood Pallets Ltd
2333 South Frontage Road
Sardis Industrial Park
Sardis, MS
Panola 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: APR 17 2014

Expires: MAR 31 2019

Permit No. 2100-00016

Agency Interest # 8610

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Other Relevant Documents:

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Inca Presswood Pallets Ltd
Subject Item Inventory
Permit Number:2100-00016
Activity ID No.: PER20130001

Subject Item Inventory:

ID	Designation	Description
AI8610	8610	Presswood Pallet Manufacturing facility
EQPT1	AA-001	Rotary Wood Chip Dryer System. 16 MMBTU/Hr Dryer--Woodwaste; 21 MMBTU/Hr - natural gas equipped with a multiclone
EQPT2	AA-002	Wood Fired Boiler 4.2 MMBTU/Hr--Woodwaste or natural gas equipped with a multiclone
EQPT4	AA-004	Hammermill (for size reduction of wood chips) equipped with a cyclone
EQPT5	AA-005	Presswood Pressing Operation to form pallets
EQPT6	AA-006	Fourteen (14) gallon Parts Washer
EQPT7	AA-007	Eleven (11) space heaters with heat input capacities totaling 8.53 MMBTU/hr
EQPT8	AA-008	600 gallon diesel fuel oil storage tank
EQPT10	AA-009	Wood Waste Grinder for boiler fuel

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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KEY

WDPT = Withdrawal Point

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AI0000008610 (8610) Presswood Pallet Manufacturing facility:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		<p>The permittee is limited to production of forty three thousand one hundred and forty three (43,143) tons/year of presswood product on a twelve (12) month rolling total.</p> <p>The permitte must demonstrate compliance with this limit by recordkeeping of monthly production and have the records readily available for view by MDEQ at any time. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]</p>

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. [11 Miss. Admin.Code Pt. 2, R.2.2.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 for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	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. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]

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AI0000008610 (continued):

Narrative Requirements:

Condition No.	Condition
T-3	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-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	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. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	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-7	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. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	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]

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AI0000008610 (continued):

Narrative Requirements:

Condition No.	Condition
T-10	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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	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. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

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AI0000008610 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 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" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	<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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]</p>
T-19	<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. [11 Miss. Admin.Code Pt. 2, R.2.9.]</p>
T-20	<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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]</p>

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AI0000008610 (continued):

Narrative Requirements:

Condition No.	Condition
T-21	<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 [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]</p>
T-22	<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. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>

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AI0000008610 (continued):

Narrative Requirements:

Condition No.	Condition
T-23	<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. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-24	<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. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-25	<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. [11 Miss. Admin.Code Pt. 2, R.2.8.]</p>
T-26	<p>The operator of the equipment covered by this permit shall operate and maintain this equipment to assure that the emission rates will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations. [APC-S-2 II.B(10)]</p>

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EQPT0000000001 (AA-001) Rotary Wood Chip Dryer System. 16 MMBTU/Hr Dryer--Woodwaste; 21 MMBTU/Hr - natural gas equipped with a multiclone:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: Such emissions shall be limited for AA-001, to 17.0 lbs/hr and 74.5 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A based upon a maximum throughput rate of 5.15 tons of chips per hour. These emissions are filterable particulate only. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
L-2	Opacity	Opacity: Such emissions shall be limited for emission point AA-001, to 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.B]
L-3	Particulate Matter (10 microns or less)	Particulate Matter (10 microns or less): Such emissions shall be limited for AA-001, to 17.0 lbs/hr and 74.5 tons/year based upon a maximum based upon a maximum throughput of 5.15 tons of chips per hour. These emissions are filterable particulate only. [11 Miss. Admin. Code Pt. 2, R. 2.II(B)10]
L-4		Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.1]

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EQPT0000000001 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For Emission Point AA-001, the permittee shall perform stack testing in accordance with EPA Reference Methods 1-5 or FRM 201 or 201A to demonstrate compliance with the permitted particulate matter emission limitations. If the permittee opts to use Method 5, the permittee shall assume all filterable particulate matter is 10 microns or less to demonstrate compliance for the limitation for PM with a diameter of 10 microns or less. The testing shall be performed and the stack test report shall be submitted within one year of the reissuance date of this permit. For the purposes of compliance demonstration, the permittee shall operate the source at a minimum of 80% of maximum capacity.</p> <p>The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test dates(s) to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s). [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]</p>
M-2		<p>For the Emission Point AA-001, the permittee shall conduct monthly inspections for visible emissions. If visible emissions are observed from an emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]</p>
M-3		<p>For Emission Point AA-001, the permittee shall perform monthly inspections of the control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]</p>

Record-Keeping Requirements:

Condition No.	Condition
R-1	<p>For Emission Point AA-001, the permittee shall maintain the following records for five years: (1) the monthly visible observations and any subsequent Method 9 test for opacity, (2) the monthly inspections on the control equipment for AA-001 and any subsequent maintenance. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]</p>

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EQPT0000000001 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	For Emission Point AA-001, the permittee shall submit results to the Office of Pollution Control within one month of conducting the stack test for Particulate Matter. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-001, the permittee is authorized to burn: (1) uncontaminated wood-waste (2) particleboard waste including on-site ground up presswood product (3) medium density fiberboard (MDF) or (4) natural gas. Particleboard and MDF waste fuel shall be wood-waste fuel derived from products limited to wood and urea-formaldehyde resin based adhesives. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
T-2	For the Emission Point AA-001, the permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. [APC-S-2 II.B(10)]

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EQPT0000000002 (AA-002) Wood Fired Boiler 4.2 MMBTU/Hr--Woodwaste or natural gas equipped with a multiclone:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: Such emissions shall be limited for AA-002, to 2.0 lbs/hr and 8.8 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. These emissions are filterable particulate emissions only. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
L-2	Opacity	Opacity: Such emissions shall be limited for AA-002, to 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [APC-S-1 3.2]
L-3	Particulate Matter (10 microns or less)	Particulate Matter (10 microns or less): Such emissions shall be limited for AA-002, to 2.0lbs/hr and 8.8 tons/year, as determined by EPA Reference Method 201 or 201A. These emissions are filterable particulate emissions only. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
L-4		The permittee is authorized to burn only uncontaminated wood-waste, particleboard waste (including on-site ground up presswood product), medium density fiberboard (MDF) waste, or natural gas in the boiler. Particleboard and MDF waste fuel shall be limited to wood-waste fuel derived from products containing only wood and urea-formaldehyde resin based adhesives. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]
L-5		Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period. [APC-S-1 3.1(b)]
L-6		Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. [APC-S-1 3.1(c)]

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EQPT0000000002 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For the Emission Point AA-002, the permittee shall perform monthly inspections of the control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]
M-2		For Emission Point AA-002, the permittee shall conduct monthly inspections for visible emissions. If visible emissions are observed from an emission point (one-minute interval), the permittee shall conduct an observation in accordance with EPA Reference Method 9. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-002, the permittee shall maintain records for five years for the following: (1) the monthly inspections of the air control equipment and any associated maintenance performed and (2) monthly testing for visible emissions and the associated Method 9 test if emissions are detected. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	For the Emission Point AA-002, the permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. [APC-S-2 II.B(10)]

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EQPT0000000004 (AA-004) Hammermill (for size reduction of wood chips) equipped with a cyclone:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	<p>Particulate Matter: For Emission Point AA-004, the permittee shall not cause, permit, or 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:</p> $E = 4.1 p \text{ Exp } 0.67$ <p>where E is the emission rate in lbs/hr and P is the process weight input in tons/hr. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.6(a)]</p>
L-2	Opacity	<p>Opacity: For Emission Point AA-004, the permittee shall not cause, allow or permit the discharge into the ambient air any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity equivalent to that of smoke. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.B]</p>

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		<p>For the Emission Point AA-004, the permittee shall perform monthly inspections of the control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]</p>
M-2		<p>For the Emission Point AA-004, the permittee shall conduct monthly observations for visible emissions. If visible emissions are observed from an emission point (one-minute interval), the permittee shall conduct an EPA Reference Method 9 test. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]</p>

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EQPT0000000004 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Point AA-004, the permittee shall maintain the following records for five years for inspection by Office of Pollution Control personnel: (1) monthly inspections of the air control equipment and any associated maintenance and (2) monthly visual observations and any subsequent Method 9 observations. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]

Narrative Requirements:

Condition No.	Condition
T-1	For the Emission Point AA-004, the permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(11)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Inca Presswood Pallets Ltd
Facility Requirements
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Activity ID No.: PER20130001

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EQPT0000000005 (AA-005) Presswood Pressing Operation to form pallets :

Narrative Requirements:

Condition No.	Condition
T-1	Such air emissions equipment for AA-005, shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Inca Presswood Pallets Ltd
Facility Requirements
Permit Number:2100-00016
Activity ID No.: PER20130001

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EQPT0000000006 (AA-006) Fourteen (14) gallon Parts Washer:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emissions equipment for AA-006, shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Inca Presswood Pallets Ltd
Facility Requirements
Permit Number:2100-00016
Activity ID No.: PER20130001

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EQPT0000000007 (AA-007) Eleven (11) space heaters with heat input capacities totaling 8.53 MMBTU/hr:

Narrative Requirements:

Condition No.	Condition
T-1	Such air emissions equipment for AA-007, shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Inca Presswood Pallets Ltd
Facility Requirements
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Activity ID No.: PER20130001

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EQPT0000000008 (AA-008) 600 gallon diesel fuel oil storage tank:

Narrative Requirements:

Condition	
No.	Condition
T-1	Such air emissions equipment for AA-008, shall be operated as efficiently as possible to provide the maximum reduction of air contaminants. [11 Miss. Admin. Code Pt. 2, Ch. 2. II.B(10)]

GENERAL INFORMATION

Inca Presswood Pallets Ltd
2333 South Frontage Road
Sardis Industrial Park
Sardis, MS
Panola County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
8610	Inca Presswood Pallets, LTD	Official Site Name	9/11/1990	
2810700016	Inca Presswood Pallets LTD	Air-AIRS AFS	10/12/2000	
210000016	Inca Presswood Pallets, LTD	Air-State Operating	9/11/1990	9/1/1993
MSR000494	Inca Presswood Pallets, LTD	GP-Baseline	7/14/1992	1/17/2001
MSR000494	Inca Presswood Pallets, LTD	GP-Baseline	1/17/2001	1/30/2006
210000016	Inca Presswood Pallets, LTD	Air-Synthetic Minor Operating	10/29/2003	9/30/2008
MSR000494	Inca Presswood Pallets, LTD	GP-Baseline	1/30/2006	1/28/2011
210000016	Inca Presswood Pallets, LTD	Air-Synthetic Minor Operating	10/13/2008	9/30/2013
MSR000494	Inca Presswood Pallets, LTD	GP-Baseline	1/28/2011	9/28/2015
210000016	Inca Presswood Pallets Ltd	Air-Synthetic Minor Operating	4/17/2014	3/31/2019

Basin: Yazoo River Basin

Location Description:PG-Plant Entrance (General). Data collected by Nancy Morre on 10/21/2005. Elevation 400 feet.