

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

**AND PREVENTION OF SIGNIFICANT
DETERIORATION AUTHORITY
TO CONSTRUCT AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT**

Biewer Sawmill Newton LLC
331 Colisuem Drive
Newton, Mississippi
Newton County

has been granted permission to construct air emissions equipment to comply with 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 and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: MAR 28 2016

Permit No.: 1980-00044

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
3. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a 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 permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
9. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
11. Solids Removal: 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. (Ref.: Miss. Code Ann. 49-17-29)
12. Diversion and Bypass of Air Pollution Controls: 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 11 Miss. Admin. Code Pt. 2, R. 1.1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
13. Fugitive Dust Emissions from Construction Activities: 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)
14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon 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 emissions. (Ref.: Miss. Code Ann. 49-17-21)
15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
 - a) Persistent violation of any of the 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 federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

16. Public Record and Confidential Information: 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. (Ref.: Miss. Code Ann. 49-17-39)
17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)
18. Severability: 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. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
19. Permit Expiration: 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
21. Beginning Operation: Except as prohibited in Part I, Condition 24 of this permit, 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 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
22. Application for a Permit to Operate: Except as otherwise specified in Part I, Condition 24 of this permit, 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Part I, Condition 24 of this permit, 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
24. Application Requirements for a Permit to Operate for Moderate Modifications: 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
25. Compliance Testing: Regarding compliance testing:
- 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.
 - b) Compliance testing will be performed at the expense of the permittee.
 - c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (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.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), & (6).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
2. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was

performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment associated with a Saw Mill, as described in the following table.

Emission Point ID	Description
AA-001	Natural Gas Direct Fired Lumber Kiln with a 38.76 MMBTU/Hr burner.
AA-002	Natural Gas Direct Fired Lumber Kiln with a 38.76 MMBTU/Hr burner
AA-003	Natural Gas Direct Fired Lumber Kiln with a 38.76 MMBTU/Hr burner
AA-004	Log Process Debarker
AA-005	Bark Hog
AA-007	Sawmill
AA-008	Sawmill Chipper
AA-009	Planer Mill equipped with a process cyclone and baghouse
AA-010	Haul Roads
AA-011	Wood Waste By-Product Storage Bins
AA-012	1000 Gallon Gasoline Storage Tank
AA-013	Emergency Fire Pump Engine
AA-014	Emergency Engine

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point ID	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)	3.1	PM (filterable only)	$E = 0.8808 * T^{0.1667}$
AA-001 AA-002 AA-003	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD.	3.2	HAPs	General Applicability
AA-001 AA-002 AA-003	PSD Construction Permit issued DATE (limit is for the three kilns combined)	3.7	VOC (Total)	BACT: Proper Operation and Maintenance 3.80 lb/MBF not to exceed 494.4 tons/yr
AA-001 AA-002 AA-003	PSD Construction Permit issued DATE (limit is for the three kilns combined)	3.8	Production	The permittee shall limit total combined kiln production to 260,000,000 board feet per year (BFY) in any 12-month rolling period.
AA-001 AA-002 AA-003 AA-009	11 Miss. Admin. Code Pt. 2, R.1.3.B	3.3	Opacity	40%
AA-004 AA-005 AA-007 AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.3.F	3.4	PM (filterable only)	$E = 4.1p^{0.67}$
AA-012	PSD Construction Permit issued DATE	3.7	VOC (Total)	BACT: Light Tank Color
AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.5	PM (filterable only)	0.6 lbs/MMBTU

AA-013 AA-014	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ, 63.6585 and 63.6590(c)(6)	3.6	Applicability	MACT applicability requiring compliance with NSPS Subpart IIII
	PSD Construction Permit issued DATE	3.7	VOC	BACT: Meet emission standards requirements of NSPS Subpart IIII

- 3.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall not have particulate emissions (filterable only) from fossil fuel burning installations of greater than 10 million BTU per hour heat input that exceeds the emission rate as determined by the relationship $E = 0.8808 \cdot I^{-0.1667}$, where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)
- 3.2 Emission Points AA-001, AA-002, and AA-003 are affected by and shall comply with the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD and the General Provisions, 40 CFR Part 63, Subpart A. Emission Points AA-001, AA-002 and AA-003 will be subject to and shall comply with Subpart DDDD upon initial startup. (Ref.: 40 CFR 63.2231)
- 3.3 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

- 3.4 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (filterable only) 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.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref: 11 Miss. Admin. Code Pt. 2, R. 1.3.F)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.5 For Emission Point AA-013 and AA-014, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.6 Emission Points AA-013 and AA-014 are subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. These are new emergency stationary RICE located at a major source and as such shall meet the requirements of Subpart ZZZZ by meeting the applicable requirements of 40 CFR Part 60, Subpart IIII. No further requirements of Subpart ZZZZ apply to the engines. (Ref. 40 CFR 63, Subpart ZZZZ.63.6585 and 63.6590(c)(6))
- 3.7 For Emission Points AA-001, AA-002, AA-003, AA-012, AA-013 and AA-014, the permittee shall comply with the operating and BACT limits established in the Section 3 table above. (Ref.: PSD Construction Permit issued DATE)
- 3.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall limit total combined kiln production to 260,000,000 board feet per year in any 12-month rolling period. (Ref.: PSD Construction Permit issued DATE)
- 3.9 Emission Points AA-004 and AA-007 must be fully enclosed units and within a building including four walls, a roof, and doors no larger than the walls on which they reside. (Ref.: PSD Construction Permit issued DATE)

SECTION 4
WORK PRACTICES

The permittee is required to operate Emission Points AA-001, AA-002, and AA-003 and associated equipment using Good Work Practices. This includes regularly scheduled maintenance on the kiln and internal kiln monitoring to minimize over-drying of lumber in accordance with the facility's operations and maintenance manual. Records shall be kept which demonstrate that Good Work Practices have been utilized in the operation of the kilns.

SECTION 5.B
MONITORING AND RECORDKEEPING REQUIREMENTS

- 5.B.1 For Emission Point AA-009, the permittee shall perform weekly inspections of the air pollution control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. In the event of a failure of the air pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the air pollution control equipment is restored. Records of weekly inspections and any maintenance work shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. The permittee shall maintain these records for at least five (5) years following the date of such record. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.2 For Emission Point AA-009, the permittee shall assure compliance with the opacity limitations by having an observer perform weekly opacity observations during daylight hours for a minimum of six (6) consecutive minutes and maintain a log of the results. If any visible emissions are detected, then a Visible Emission Evaluation (VEE) shall be performed using EPA Reference Method 9 by a certified observer. If any visible emissions are detected from a stack, the observation on that stack may be immediately ceased and the VEE may then be performed by a certified observer. If conditions are such that opacity readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. The permittee shall maintain a log of the results and the log shall be made available upon request from MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.B.3 For Emission Point AA-009, the permittee shall demonstrate compliance with PM/PM₁₀ and Opacity emission limitations by stack testing in accordance with EPA Reference Methods 1-5, and 9, 40 CFR 60, Appendix A and the procedures outlined below:
- a. The initial compliance demonstration test shall be performed within 180 days after initial start-up of the permitted equipment.
 - b. 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.
 - c. 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).

- d. Testing must be performed at no less than 80% of the maximum rated capacity of the system. If the permittee desires to test at a rate less than 80% of maximum rated capacity, it must be agreed upon by MDEQ during a pretest conference.
- e. The test must consist of three test runs of at least one (1) hour each.
- f. The test results must be submitted to the Office of Pollution Control (OPC) within 60 days following completion of the compliance demonstration test.
- g. The compliance demonstration testing shall be performed once. The need for additional testing will be addressed in the facility's operating permit, once issued.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

- 5.B.4 The permittee shall monitor and record monthly the total board feet of wood processed through the kilns. These records shall be kept on site for a period of five (5) years and shall be submitted in accordance with Condition 5.C.2. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

SECTION 5.C
REPORTING REQUIREMENTS

- 5.C.1 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. Such report shall be made within five (5) days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.C.2 The permittee shall submit reports of monitoring required by Condition 5.B.4 of this permit by July 31 and January 31 for the preceding twelve month rolling period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

- 5.C.3 With the certification of construction as required by Section 1, Part B, Condition 3 of this permit, the permittee shall additionally certify that Emission Points AA-004 and AA-007 were constructed in accordance with Condition 3.9 and Emission Point AA-012 was constructed in accordance with Condition 3.7 of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)