



State of Mississippi

AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment



THIS CERTIFIES

Georgia Pacific Wood Products LLC, Taylorsville

Highway 28 West

Taylorsville, MS

Smith 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: JUL 08 2016

Expires:

Permit No. 2500-00002

Agency Interest # 913

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Permit To Construct Air Emissions Equipment

Georgia Pacific Wood Products LLC, Taylorsville

Subject Item Inventory

Permit Number: 2500-00002

Activity ID No.: PER20160001

Subject Item Inventory:

ID	Designation	Description
AI913	913	Plywood Manufacturing Facility
EQPT23	AA-900	Natural Gas Fired Combustion Turbine with Heat Recovery Steam Generator (HRSG)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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AI0000000913 (913) Plywood Manufacturing Facility:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	<p>Opacity: Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity as determined by EPA Test Method 9 as found in 40 CFR Part 60 Appendix A, and subject to the exceptions provided in (a) & (b).</p> <p>(a)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.</p> <p>(b)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) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. [11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.3.A]</p>
L-2	Opacity	<p>Opacity: 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 as determined by EPA Test Method 9 as found in 40 CFR Part 60 Appendix A. This shall not apply to vision obscuration caused by uncombined water droplets. [11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.3.B]</p>

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AI0000000913 (913) Plywood Manufacturing Facility:

Submittal/Action Requirements:

Condition No.	Condition
S-1	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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C (2).]
S-3	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. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

Narrative Requirements:

General Condition:

Condition No.	Condition
T-1	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. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	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]

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AI0000000913 (913) Plywood Manufacturing Facility:

Narrative Requirements:

Condition No.	Condition
T-4	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 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	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: 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-6	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. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	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]
Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
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. [11 Miss. Admin.Code Pt. 2, R.2.2.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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]

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AI0000000913 (913) Plywood Manufacturing Facility:

Narrative Requirements:

Condition No.	Condition
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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(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. [11 Miss. Admin.Code Pt. 2, R.2.2.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 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.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. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]
T-18	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. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]

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AI0000000913 (913) Plywood Manufacturing Facility:

Narrative Requirements:

Condition No.	Condition
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.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 11 Miss. Admin. Code Pt. 2, R. 2.13.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	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. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]
T-24	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]

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AI0000000913 (913) Plywood Manufacturing Facility:

Narrative Requirements:

Condition No.	Condition
T-25	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. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]

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EQPT0000000023 (AA-900) Natural Gas Fired Combustion Turbine with Heat Recovery Steam Generator (HRSG):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: For Emission Point AA-900, the maximum permissible particulate matter emissions shall not exceed an emission rate as determined by the relationship $E=0.8808*I^{-0.1667}$ 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. [11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.3.D(1)(b)]
L-2	Nitrogen oxides	Nitrogen oxides: For Emission Point AA-900, the permittee must meet the applicable NOX emission limit in Table 1 of NSPS Subpart KKKK. When firing natural gas, the NOX emission limit is 25 ppm at 15 percent O2. When the heat recovery unit operates independent of the combustion turbine, the NOX emission limit is 54 ppm at 15 percent O2. The HRSG is proposed to operate independently of the combustion turbine for “a maximum of 48 hours” per year for maintenance purposes; therefore, the 54 ppm at 15 percent O2 emission standard is applicable during maintenance activities. [40 CFR 60.4320(a)]
L-3	Sulfur Dioxide	Sulfur Dioxide: For Emission Point AA-900, the maximum discharge of sulfur dioxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.4.A(1)]
L-4	Sulfur Dioxide	Sulfur Dioxide: For Emission Point AA-900, the permittee must not burn any fuel which contains total potential sulfur emissions in excess of 0.060 lbs SO2/MMBTU heat input. [40 CFR 60.4330(a)(2)]

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EQPT0000000023 (AA-900) Natural Gas Fired Combustion Turbine with Heat Recovery Steam Generator (HRSG):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1	Nitrogen oxides	<p>Nitrogen oxides: For Emission Point AA-900, the permittee must conduct an initial performance test within 60 days after achieving the maximum production rate at which the facility will be operated, but not later than 180 days after initial startup, as required in 40 CFR 60.8. Subsequent NOX performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test) in accordance with 40 CFR 60.4400 to demonstrate continuous compliance. If the NOX emission result from the performance test is less than or equal to 75 percent of the NOX emission limit for the turbine, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NOX emission limit for the turbine, the permittee must resume annual performance tests.</p> <p>These compliance tests shall be conducted and a test report must be submitted within sixty (60) days of completing the test. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ.</p> <p>Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. After the first successful submittal of an initial written test protocol, the permittee may request that the resubmittal of testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. [11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(11), 40 CFR 60.4340(a), 40 CFR 60.4400(a) and (b)]</p>
M-2	Sulfur Dioxide	<p>Sulfur Dioxide: For Emission Point AA-900, the permittee may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emission of 0.060 lbs SO₂/MMBTU heat input. The permittee must make the required demonstration of the fuel quality characteristics in a current, valid purchase contract for the fuel, specifying that the total sulfur content for natural gas use is 20 grains of sulfur or less per 100 standard cubic feet. [40 CFR 60.4365(a)]</p>

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EQPT0000000023 (AA-900) Natural Gas Fired Combustion Turbine with Heat Recovery Steam Generator (HRSG):

Narrative Requirements:

Condition No.	Condition
T-1	For Emission Point AA-900, a new stationary combustion turbine that is a lean premix gas-fired stationary combustion turbine, the permittee must comply with the Initial Notification requirements set forth in 40 CFR 63.6145 but need not comply with any other requirement of 40 CFR 63 Subpart YYYY until EPA takes final action to require compliance and publishes a document in the Federal Register. [40 CFR 63.6095(d)]
T-2	Emission Point AA-900 shall become operational after completion of the shakedown period. Shakedown is defined as the period beginning with initial startup and ending no later than initial performance testing, during which operational and contractual testing and tuning is conducted to ensure the safe, efficient and reliable operation of the plant. The shakedown period shall be no greater than 180 days. Emission Point AA-500 shall be decommissioned and taken out of service upon completion of the shakedown period for AA-900. Within 30 days of completion of the shakedown period, the permittee shall submit a notification to MDEQ that the shakedown period is complete and AA-500 has been decommissioned and taken out of service. (Ref.: Federally Enforceable Construction Permit Issued <Issuance Date>). [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10)]
T-3	Emission Point AA-900 is subject to and shall comply with the New Source Performance Standards for Stationary Combustion Turbines, 40 CFR 60 Subpart KKKK. This combustion turbine qualifies as a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBTU) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005. 40 CFR Part 60 Subpart KKKK does apply to emissions from any associated heat recovery steam generators (HRSG) and duct burners. [40 CFR 60.4305(a)]
T-4	Emission Point AA-900 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, 40 CFR 63 Subpart YYYY. [40 CFR 63.6085]
T-5	Beginning upon permit issuance date, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-900, the Natural Gas Fired Combustion Turbine with Heat Recovery Steam Generator (HRSG). The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified herein. [11 Miss. Admin. Code Pt. 2, Ch. 2. R. 2.2.B(10)]

GENERAL INFORMATION

Georgia Pacific Wood Products LLC, Taylorsville
Highway 28 West
Taylorsville, MS
Smith County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
913	Georgia-Pacific Wood Products, LLC	Official Site Name	12/11/2006	
MSD991277211	Georgia Pacific Corporation, Taylorsville Plywood Plant	Hazardous Waste-EPA ID	08/18/1980	08/10/2007
250000002	Georgia Pacific Corporation, Taylorsville Plywood Plant	Air-Construction	10/22/1999	
MSR110055	Georgia Pacific Corporation, Taylorsville Plywood Plant	GP-Sara Title III	10/27/1992	01/08/2001
MS0002194	Georgia Pacific Corporation, Taylorsville Plywood Plant	Water - NPDES	11/12/1998	10/31/2003
MSP091731	Georgia Pacific Corporation, Taylorsville Plywood Plant	Water - Pretreatment	11/22/2000	10/30/2005
2812900002	Georgia Pacific, Taylorsville Plywd	Air-AIRS AFS	10/22/1999	
MSR110055	Georgia Pacific Corporation, Taylorsville Plywood Plant	GP-Baseline	01/08/2001	12/15/2005
MS0002194	Georgia Pacific Corporation, Plywood Plant	Water - NPDES	11/24/2003	08/07/2007
MSR110055	Georgia Pacific Corporation, Taylorsville Plywood Plant	GP-Baseline	12/15/2005	01/19/2011
MSP091731	Georgia Pacific Corporation, Taylorsville Plywood Plant	Water - Pretreatment	01/18/2006	08/07/2007
250000002	Georgia Pacific Wood Products LLC	Air-Title V Fee Customer	01/02/2001	
914	Georgia Pacific Corporation	Official Site Name	10/02/1992	10/02/1992
MSD980600068	Georgia Pacific Corporation, Taylorsville Particleboard Plant	Hazardous Waste-EPA ID	08/18/1980	02/07/2007
MSR110058	Georgia Pacific Corporation, Taylorsville Particleboard Plant	GP-Sara Title III	10/02/1992	01/08/2001
MS0035343	Georgia Pacific Corporation, Taylorsville Particleboard Plant	Water - NPDES	08/12/1997	08/13/2002
MSP091728	Georgia-Pacific Corporation, Taylorsville Particleboard Plant	Water - Pretreatment	11/22/2000	07/08/2003
250000002	Georgia Pacific Corporation, Taylorsville Particleboard and Plywood Plant	Air-Title V Operating	01/02/2001	12/31/2005
MSR110058	Georgia Pacific Corporation, Taylorsville Particleboard Plant	GP-Baseline	01/08/2001	12/14/2005
MS0035343	Georgia Pacific Corporation, Taylorsville Particleboard Plant	Water - NPDES	01/03/2003	11/17/2003
MSR110058	Georgia Pacific Corporation, Taylorsville Particleboard Plant	GP-Baseline	12/14/2005	12/01/2006
913	Georgia Pacific Corporation, Taylorsville	Historic Site Name	10/27/1992	12/11/2006
MS0002194	Georgia Pacific Wood Products LLC, Taylorsville	Water - NPDES	08/07/2007	10/30/2008
MSP091731	Georgia Pacific Wood Products LLC, Taylorsville	Water - Pretreatment	08/07/2007	12/31/2010
MSD991277211	Georgia-Pacific Wood Products LLC Taylorsville Plant	Hazardous Waste-EPA ID	08/10/2007	

GENERAL INFORMATION

913	Georgia Pacific Wood Products LLC, Taylorsville	Air-Notification	07/10/2008	
913 001	Georgia Pacific Particle Board Plant, Taylorsville	GARD	11/19/1980	
913 002	Georgia Pacific Plywood Plant, Taylorsville	GARD	11/19/1980	
913 003	Georgia Pacific Forestry	GARD	11/19/1980	
MS0002194	Georgia Pacific Wood Products LLC, Taylorsville	Water - NPDES	01/21/2009	12/31/2013
250000002	Georgia Pacific Corporation, Taylorsville Particleboard and Plywood Plant	Air-Title V Operating	02/14/2011	01/31/2016
MSR110055	Georgia-Pacific Wood Products LLC, Taylorsville	GP-Baseline	01/19/2011	01/11/2016
MSP091731	Georgia-Pacific Wood Products LLC, Taylorsville	Water - Pretreatment	12/21/2012	11/30/2017
MS0002194	Georgia Pacific Wood Products LLC, Taylorsville	Water - NPDES	03/21/2014	02/28/2019
MSR110055	Georgia-Pacific Wood Products LLC, Taylorsville	GP-Baseline	01/11/2016	10/31/2020
250000002	Georgia Pacific Wood Products LLC, Taylorsville	Air-Construction	07/08/2016	

Basin: Pascagoula River Basin

Location Description: PG - Plant Entrance (General). Data collected by Krystal Rudolph on 11/20/02. Should be same as AI 914