

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Hankins Lumber Company Inc, Elliott  
496 Nat G Trout Road  
Elliott, MS  
Grenada, 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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and 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.

Permit Issued: SEP 14 2016

Effective Date: As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: August 31, 2021

Permit No.: 0960-00010

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
  - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
  - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
  - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
  - (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title

V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)

- 1.5 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 permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
  - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
  - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under the permit; and

- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee

submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 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 or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the

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:

- (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:
  - (1) 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
  - (2) the source is approved to use under any permit issued under 40 CFR 52.21 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 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordinance. Open burning of land-clearing debris must not use starter or auxiliary fuels which



cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

- (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.
- (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.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (2) the permitted facility was at the time being properly operated;
  - (3) 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

- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.

- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
  - (1) 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 5 working days of the time the upset began; and
    - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.

- (2) In any enforcement proceeding, the permittee seeking to establish the

occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
  - (1) 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.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
  - (1) 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 the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
  - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The No. 1 Erie City Woodwaste Boiler with a rated heat input capacity of 65 MMBTU/hr with a multiclone (inherent to the operation of the boiler)
AA-002	The No. 2 Bigelow Woodwaste Boiler with a rated heat input capacity of 23 MMBTU/hr with an ash arrestor (inherent to the operation of the boiler)
AA-003	Log Debarking and Green End Sawmill Operations
AA-004	Coastal Planer Mill equipped with a baghouse for control of particulate matter emissions
AA-006	Three batch steam-heated dry lumber kilns
AA-007	One batch steam-heated dry lumber kiln

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 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 subject to the exceptions provided in (a) & (b).
- (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.
  - (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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.A.2 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, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Pollutant/Parameter	Condition Number	Limit/Standard
AA-001 and AA-002	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD, §§63.7485, 63.7490, 63.7495(b), 63.7499(h) and (l)	HAP	3.B.1	General Applicability
	§§63.7500(a)(3) and 63.7500(f)	General Operating Requirement	3.B.2	See Condition
	§63.7510(a), Table 2  §63.7510(a), Table 2  §63.7500(a)(2) and Table 4 of Subpart DDDDD	Filterable PM	3.B.3	0.44 lb/MMBTU of heat input or 0.55 lb/MMBTU of steam output
		CO		3,500 ppmv corrected to 3 percent oxygen, 3-run average; or 3.5 lb/MMBTU of steam output, 3-run average
		Hg		0.0000057 lb/MMBTU of heat input or 0.0000064 lb/MMBTU of steam output
		HCl		0.022 lb/MMBTU of heat input or 0.025 lb/MMBTU of steam output
		Operating Limits	3.B.4	See Condition
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	SO <sub>2</sub>	3.B.5	4.8 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	Opacity	3.A.1	40%
	Title V Permit issued October 1, 2004, and as modified in TV Permit issued June 11, 2008 and December 9, 2009	Fuel Restriction	3.B.8	Woodwaste is defined as sawdust, bark, green chips, dry chips, ends, plywood trim, and planer shavings.  Uncontaminated woodwaste (sawdust, bark, and green chips) may be purchased from outside sources including Koppers Company.

Emission Point(s)	Applicable Requirement	Pollutant/Parameter	Condition Number	Limit/Standard
AA-004, AA-006, AA-007	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	PM	3.B.6	$E=4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	Opacity	3.A.2	40%
AA-007	Prevention of Significant Deterioration (PSD) Permit to Construct issued December 3, 2015	VOCs	3.B.7	4.09 pounds per thousand board feet not to exceed 112 tons per year of VOCs  54,750 thousand board-feet per year (MBF/yr)
AA-006 and AA-007	Prevention of Significant Deterioration (PSD) Permit to Construct issued December 3, 2015	VOCs	3.B.7	200 million board feet per year
	40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products	HAPs	3.B.9	Applicability (40 CFR 63 Subpart DDDD)



3.B.1 Emission Points AA-001 and AA-002 are subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. Emission Points AA-001 and AA-002 are existing large boilers that are in the “hybrid suspension/grate burner designed to burn wet biomass/bio-based solid” fuel subcategory as listed in 40 CFR 63.7499(h) and as defined in 63.7575. The permittee shall comply with all applicable requirements in 40 CFR 63 Subpart DDDDD by no later than January 31, 2017. (Ref.: 40 CFR §63.7485, 63.7490, 63.7495(b), 63.7499(h) and (l))

3.B.2 Beginning January 31, 2017, the permittee shall operate and maintain Emission Points AA-001 and AA-002, including any associated pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

For Emission Points AA-001 and AA-002, the emission limits, work practice standards, and operating limits apply at all times the emission points are in operation, except during startup and shutdown during which time the permittee shall comply with Condition 3.D.3 of this permit. (Ref.: 40 CFR §63.7500(a)(3), § 63.7500(f), and §63.7505(a))

3.B.3 Beginning January 31, 2017, emissions from Emission Points AA-001 and AA-002 shall not exceed:

- (a) Filterable PM - 0.44 lb/MMBtu of heat input or 0.55 lb/MMBTU of steam output
- (b) CO – 3,500 ppmv at 3 percent oxygen, 3-run average; or 3.5 lb/MMBtu of steam output, 3-run average
- (c) HCl - 0.022 lb/MMBtu of heat input or 0.025 lb/MMBTU of steam output
- (d) Mercury – 0.0000057 lb/MMBtu of heat input or 0.0000064 lb/MMBTU of steam output. (Ref.: 40 CFR §63.7500(a)(1) and Table 2 of Subpart DDDDD)

3.B.4 Beginning January 31, 2017, Emission Points AA-001 and AA-002 shall meet the following operating limits from Table 4 of Subpart DDDDD that are applicable to each boiler:

- (a) Maintain the daily 30-Day rolling average operating load of each boiler so that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test.
- (b) Operate the oxygen trim system on each boiler with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most

recent CO performance test according to Table 7 of Subpart DDDDD.  
(Ref.: 40 CFR 63.7500(a)(2) and Items 7 and 8 of Table 4)

- 3.B.5 For Emission Points AA-001 and AA-002, the maximum discharge of sulfur oxides 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.B.6 For Emission Points AA-004, AA-006 and AA-007, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship:

$$E=4.1p^{0.67}$$

Where E is the emission rate in pounds per hour and p is the process weight input 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(1).)

- 3.B.7 For Emission Point AA-007, the permittee shall limit the total annual throughput through the kiln to 54,750 thousand board-feet per year (MBF/yr) and for Emission Points AA-006 and AA-007, the permittee shall limit the total annual throughput through the kilns to 200 million board feet per year (MMBF/yr). The lumber throughput must be measured on a daily basis and tracked on 12-month rolling total.

For Emission Point AA-007, the permittee shall limit VOC emissions to 4.09 lb/MBF not to exceed 112 tons/yr, as determined by monitoring of throughput and recordkeeping. (Ref.: PSD Permit to Construct issued on December 3, 2015)

- 3.B.8 For Emissions Points AA-001 and AA-002, the permittee shall burn no fuels other than woodwaste. For purposes of this permit, woodwaste is defined as sawdust, bark, green chips, dry chips, ends, plywood trim, and planer shavings. Uncontaminated woodwaste (sawdust, bark, and green chips) may be purchased from outside sources including Koppers Company. (Ref.: Title V Permit issued October 1, 2004, and as modified in TV Permit issued June 11, 2008 and December 9, 2009)
- 3.B.9 Emission Point AA-006 and AA-007 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD. These units are affected sources per 40 CFR 63.2231(a) of the rule; however, the only applicable requirement was the initial notification. There are no other applicable reporting requirements for these emission

points in Subpart DDDD. (Ref. 40 CFR 63.2252)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU

3.C.1 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.C.2 The maximum discharge of sulfur oxides 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Limit/Standard
AA-001 and AA-002	40 CFR 63, Subpart DDDDD, §63.7510(e), §63.7575 and Item 4 of Table 3	3.D.1	One-time Energy Assessment
	40 CFR 63, Subpart DDDDD, §63.7540(a)(10)(i)-(vi), (12) and (13) and Item 1 of Table 3	3.D.2	Initial and Subsequent Tune-ups
	40 CFR 63, Subpart DDDDD §63.7500 and Items 5 and 6 of Table 3	3.D.3	Startup and shutdown conditions

3.D.1 For Emission Points AA-001 and AA-002 the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in §63.7575 by **January 31, 2017**. An energy assessment that has been completed after January 1, 2008, that meets or is amended to meet the energy assessment requirements listed in (a) through (h) below satisfies the energy assessment requirement. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least one year between January 1, 2008 and the compliance date specified in § 63.7495 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include all data elements listed in (a) through (h) below with the extent of the evaluation for items (a)

through (e) being appropriate for the on-site technical hours specified for an energy assessment in §63.7575.

- (a) A visual inspection of the boiler or process heater system.
  - (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
  - (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
  - (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
  - (e) A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.
  - (f) A list of cost-effective energy conservation measures that are within the facility's control.
  - (g) A list of the energy savings potential of the energy conservation measures identified.
  - (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- (Ref.: 40 CFR §63.7510(e), §63.7575 and Item 4 of Table 3 in Subpart DDDDD)

3.D.2 For Emission Points AA-001 and AA-002 the permittee shall complete an initial tune-up in accordance with (a) through (f) below by **January 31, 2017**. The subsequent required tune-ups identified below shall also be in accordance with (a) through (f) below.

Beginning **January 31, 2017**, the subsequent tune-ups for Emission Points AA-001 and AA-002 shall be completed no more than 61 months after the previous one. If the unit is not operating on the required date of the tune-up, the tune-up must be conducted within 30 calendar days of startup.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown not to exceed 72 months from the previous inspection). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by MDEQ, a report containing the following information:
  - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
  - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR §63.7510(e), §63.7515(d), §63.7540(a)(10), (12) and (13) and Table 3 of Subpart DDDDD)

3.D.3 Beginning **January 31, 2017**, for emission Points AA-001 and AA-002, the permittee shall operate the boilers in accordance with the requirements found in (a) through (e) during periods of startup and shutdown:

- a) For startup the permittee must use one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
- b) Emissions must be vented to the main stacks and all control devices must be engaged if the permittee starts burning non-clean biomass during startup or

shutdown.

- c) All applicable records required by Condition 5.B.4 (g) and (h) must be kept during periods of startup and shutdown.

(Ref.: 40 CFR §63.7500(f), §63.7540(d), § 63.7555 and Items 5 and 6 of Table 3 of Subpart DDDDD)

## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)
- 4.3 The permittee shall submit progress reports consistent with an applicable schedule of compliance and 11 Miss. Admin. Code Pt. 2, R. 6.2.C(8). semiannually, or at such other frequency as is specified in an applicable requirement or by the Permit Board. Such progress reports shall contain the following:
- (a) dates for achieving the activities, milestone(s), or compliance required in the schedule of compliance, and dates when such activities, milestone(s) or compliance were achieved; and
  - (b) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 4.4 Emission Points AA-001 and AA-002 are subject to and must comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD, by **January 31, 2017**.

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 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) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)



5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001 and AA-002	PM, HCl, Hg and CO	Initial Compliance/ Stack Testing	5.B.1	40 CFR 63.7510(a)(1),(3), and (4), 63.7515(a) and (b), 63.7520(a),(b),(c),(d),and(e),63.7530(a)and(b), 63.7545(d), and Table 5 of Subpart DDDDD
	CO	Installing an oxygen analyzer system	5.B.2	40 CFR 63.7525(a) and 63.7575
	PM, HCl, Hg and CO	Continuous compliance	5.B.3	40 CFR 63. 7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8 of Subpart DDDDD
	PM, HCl, Hg and CO	Recordkeeping	5.B.4	40 CFR §63.7555, §63.7560 and §63.10(b)(2)
AA-004	Opacity	Weekly Opacity Observations	5.B.5	11 Miss. Admin. Code Pt. 2, R. 6.3.C
	CAM Plan	Monitoring required under 40 CFR 64	5.B.9, 5.B.10, 5.B.11, 5.B.12, 5.B.13, 5.B.14.	40 CFR §64.3(a)(2) and §64.7 through §64.9
AA-006 and AA-007	VOC	Process throughput	5.B.8	PSD Construction Permit issued December 3, 2015
AA-007	VOC	Operation and Maintenance	5.B.6	PSD Construction Permit issued December 3, 2015
Entire Facility	PM	Operation and Maintenance	5.B.7	11 Miss. Admin. Code Pt. 2, R. 6.3.C

5.B.1 For Emission Points AA-001 and AA-002, the permittee shall demonstrate initial compliance with the emission limitations in Condition 3.B.3 by stack testing and establishing operating limits. Stack testing must be performed in accordance with the requirements in 40 CFR 63.7520 and Table 5 of Subpart DDDDD by July 29, 2017, and submittal of the test report no later than sixty days after the testing is complete.

Subsequent tests will be conducted annually but no later than 13 months after the previous performance test. The operating limits must be established during performance test(s).

The permittee must develop a site-specific test plan according to the requirements in 40 CFR 63.7(c) and upon request make available to MDEQ any records necessary to determine the conditions of the performance tests.

The permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

If the permittee meets the requirements set forth in 40 CFR 63.7515(b), then subsequent performance tests may be performed according to the frequency outlined in 40 CFR 63.7515(b).

(Ref.: 40 CFR 63.7510(a)(1), (3) and 63.7515(a) and (b), 63.7520(a), (b), (c), (d), and (e), 63.7530(a) and (b), 63.7545(d), and Table 5 of Subpart DDDDD)

- 5.B.2 For Emission Points AA-001 and AA-002, the permittee shall install, operate, and maintain an oxygen analyzer system. An oxygen analyzer system means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in the boiler or process heater flue gas, boiler or process heater, firebox, or other appropriate location. This includes oxygen trim systems. The source owner or operator must install, calibrate, maintain, and operate the oxygen analyzer system in accordance with the manufacturer's recommendations. (Ref.: 40 CFR 63.7525(a) and 63.7575)
- 5.B.3 For Emission Points AA-001 and AA-002, the permittee shall demonstrate continuous compliance with the emission limits in Condition 3.B.3, the work practice standards in Condition 3.D.2 and the operating limits in Condition 3.B.4 according to the applicable methods listed in (a) through (g) of this Condition and specified in Table 8 of Subpart DDDDD and §63.7540.
- (a) Operate the oxygen trim system on each boiler according to Condition 3.B.4
  - (b) Collect the operating load data every 15 minutes.
  - (c) Reduce the data to a 30-day rolling average and maintain the 30-day rolling average operating load such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test according to Condition 5.B.1.
  - (d) After the initial compliance demonstration is completed, operation above the established maximum or below the established minimum operating limit is a deviation of established operating limits listed in Condition 3.B.4 except during performance

tests conducted to determine compliance with the emission limits or to establish new operating limits. Operating limits must be confirmed and reestablished during performance tests.

- (e) As specified in Condition 5.B.4, you must keep records of the type and amount of all fuels burned in in each boiler during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in equal to or lower fuel input of chlorine, mercury, and TSM than the maximum values calculated during the last performance test.
- (f) Conduct a tune-up in accordance with Condition 3.D.2
- (g) Report each instance in which the boilers did not meet the emission limits and operating limits in Conditions 3.B.3 and 3.B.4. These instances are considered deviations and as such must be reported according to the requirements of Condition 5.A.5. (Ref.: 40 CFR 63. 7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8 of Subpart DDDDD)

5.B.4 Beginning **January 31, 2017**, for Emission Points AA-001 and AA-002, the permittee must keep all applicable records that are required in (a) through (i) below:

- (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting and Initial Notification and Notification of Compliance Status or semiannual compliance report you submitted according to the requirements in §63.10(b)(2)(xiv).
- (b) Records of performance tests and other compliance demonstrations and performance evaluations as required by §63.10(b)(2)(xiv)
- (c) Keep the records required by Condition 5.B.5 including records of all monitoring data and calculated averages for applicable operating limits, such as opacity and operating load, to show continuous compliance with each emission limit and operating limit that applies to you.
- (d) Keep records of monthly fuel use by each boiler, including the types of fuel and amount used.
- (e) Records of the occurrence and duration of each malfunction of the boilers and or the associated air pollution control equipment.
- (f) Records of actions taken during periods of malfunction to minimize emissions in accordance with general duty to minimize emissions in §63.7500(a)(3), including corrective actions to restore the malfunctioning boilers, air pollution controls or monitoring equipment to normal or usual manner of operation.

- (g) Maintain records of the calendar date, time, occurrence, and duration of each startup and shutdown.
- (h) Maintain records of the types and amounts of fuels used during startup and shutdown.

Retain the required records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: 40 CFR §63.7555, §63.7560 and §63.10(b)(2))

- 5.B.5 For Emission Point AA-004, the permittee shall perform weekly visible emission observations and maintain a log of the results. If any evaluation produces an opacity equal to or greater than 10%, then the permittee shall perform opacity observations in accordance with EPA Reference Method 9, 40 CFR 60, Appendix A. A log of the results of these observations must be kept. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C)
- 5.B.6 The permittee is required to operate Kiln No 4. (AA-007) 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 kiln. (Ref.: PSD Construction Permit issued December 3, 2015)
- 5.B.7 For all Emission Points, the permittee shall operate and maintain the equipment to ensure that the emission rate will not, at any time, exceed the rates allowed by the Mississippi Air Emission Regulations.

Regular maintenance shall be performed each month or more often if necessary to maintain proper operation of the kilns and pollution control equipment. Records of this maintenance shall be kept in log form and must be made available upon review upon request during any inspection visit by MDEQ's Office of Pollution Control personnel.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment.

The permittee shall install and monitor measuring devices as are necessary for monitoring and/or measurement of pressure drop across the baghouse control system. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C)

- 5.B.8 For Emission Point AA-006 and AA-007, the permittee shall record the process throughput on a daily basis and tracked on a 12- month rolling total. These daily records

shall be kept in log form and must be made available for review upon request during any inspection visit by MDEQ personnel.

All records shall be maintained by the permittee for a period of five years following the date of such record.

(Ref.: PSD Construction Permit issued December 3, 2015)

5.B.9 For Emission Point AA-004, the permittee shall comply with the compliance assurance monitoring (CAM) requirements described in Condition 5.B.10 and as specified in 40 CFR 64.7 through 64.9, upon issuance of this permit. (Ref.: 40 CFR 64.7 through 64.9)

5.B.10 The table below summarizes the CAM plan for Emission Point AA-004.

	Indicator No. 1	Indicator No. 2
Indicator	Visible Emissions	Pressure differential across the baghouse
Measurement approach	Visible Emissions from the baghouse will be monitored weekly. When emissions exceed 10%, an EPA Reference Method 9 will be performed.	Pressure differential across the baghouse is measured using a Magnehelic pressure differential gauge.
Monitoring Methods and Location	Visual inspections done on a weekly basis.	Pressure differential gauge
Indicator Range	An excursion is defined as any visible emissions greater than 10% opacity.	Normal operating range is 0.5-6 inches of water, in accordance to manufacturer's specifications. An excursion is defined as a pressure drop greater than 6 inches of water or less than 0.5 inches of water.
Averaging Period	6-minute average	None
Data Collection Frequency	Weekly, when the planer mill is in operation.	Daily, when the planer mill is in operation.
Recordkeeping	Records of weekly visual observations to be kept in a log form, as well as results from any Method 9 observations performed.	Daily records of pressure readings, all inspections, and any maintenance performed.
QA/QC	Visible observations will be performed by a person who is certified as a visible emission reader by MDEQ or equivalent agency qualified for such services.	The pressure gauge will be calibrated, maintained, and operated in accordance with manufacturer's specifications.

5.B.11 The permittee shall maintain the necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7 (b))

5.B.12 The permittee shall conduct all the required monitoring at all times that Emission Point AA-004 is in operation, with the exception of periods when the monitoring equipment is under repair, maintenance, or required QA/QC. (40 CFR 64.7 (c))

- 5.B.13 The permittee shall, upon detecting an excursion or exceedance, restore operations of Emission Point AA-004 to its normal manner of operation. The response shall include minimizing the period of startup, shutdown, or malfunction and taking any necessary corrective action. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range. (40 CFR 64.7 (d)(1))
- 5.B.14 An excursion is defined under 40 CFR 64.1 as “a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of monitoring.” The indicator ranges for Emission Point AA-004 have been set to ensure compliance at all times with the emission limitations listed in section 3 of this permit, and are considered to be indicators of proper operation and not of compliance with the established emission limits. (40 CFR 64.3(a)(2))

**C. Specific Reporting Requirements**

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001 and AA-002		Notification of Compliance Status	5.C.1	40 CFR §63.7530(e) and §63.7545(e)(1) through(8)
		Submit a semi-annual report	5.C.2	40 CFR §63.7550(a),(b),(c), (d), and (h) and Table 9 of Subpart DDDDD
		Compliance extension	5.C.3	40 CFR 63.6(i)(4)(i)(C) and Compliance Extension Approval Letter in Appendix B
AA-006 and AA-007	VOC	Process Throughput	5.C.4	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)
AA-004	CAM	Monitoring requirements	5.C.5	40 CFR 64.9(a)

- 5.C.1 For Emission Points AA-001 and AA-002, the permittee shall submit a Notification of Compliance Status to MDEQ, by the end of the 60<sup>th</sup> day following the completion of all performance tests required by Condition 5.B.1. The Notification of Compliance Status report must include the following (a) through (j) for each unit as applicable:
- (a) A description of the affected unit including identification of which subcategory the unit is in, the design heat input capacity of the unit, and description of the fuel burned in the unit.
  - (b) Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance including all established operating limits, and including:

- (i) Identification of whether you are complying with the PM emission limit or the alternative TSM emission limit.
- (ii) Identification of whether you are complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.
- (c) A summary of the maximum CO emission levels recorded during the performance test to show that the permittee has met the applicable emission standard.
- (d) Identification of whether the permittee plans to demonstrate compliance with each applicable emission limit through performance testing or CEMS
- (e) Identification of whether the permittee plans to demonstrate compliance by emissions averaging and identification of whether the permittee plans to demonstrate compliance by using efficiency credits through energy conservation:
  - (i) If you plan to demonstrate compliance by emission averaging, report the emission level that was being achieved or the control technology employed on January 31, 2013.
- (f) If there was a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
- (g) A certification stating “This facility has met all applicable emission limits and work practice standards.”
- (h) A certification stating “This facility has had an energy assessment performed according to the procedures listed in Table 3 to Subpart DDDDD of Part 63—Work Practice Standards.”
- (i) A certification stating “This facility complies with the required tune-up according to procedures listed in 40 CFR §63.7540(a)(10) (i) through (vi).”
- (j) A certification stating “No secondary materials that are solid waste were combusted in any affected unit.”  
(Ref.: 40 CFR §63.7530(e) and §63.7545(e)(1) through(8))

5.C.2 Beginning January 31, 2017, for Emission Points AA-001 and AA-002, the permittee shall submit the information listed in (a) through (l) in accordance with the semi- annual reporting requirements listed in Condition 5.A.4 of this permit.

- (a) Company and Facility name and address

- (b) Process unit information, emission limits and operating limits
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The total fuel use by each individual boiler within the reporting period, including but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the permittee's basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.
- (e) If the permittee is conducting performance test every 3 years in accordance with Condition 5.B.1, the date of the last two performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
- (f) Statement indicating that the permittee has burned no new types of fuel in the boilers.
- (g) If there are no deviations from any emission limits and operating limits from Conditions 3.B.3 and 3.B.4, a statement that there were no deviations from the emission limits and operating limits during the reporting period.
- (h) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period that may have caused or caused an emission limit to be exceeded. Also, include a description of any actions taken by the permittee during the malfunction of the boiler or air pollution control devices to minimize emissions in accordance with Condition 3.B.2, including what actions were taken to correct the malfunction
- (i) For every instance of startup or shutdown include the information required to be monitored, collected, or recorded by Condition 5.B.4 (g) and (h).
- (j) For each deviation from an emission limit or operating limit the compliance report must additionally contain
  - (i) A description of the deviation and which emission limit or operating limit from which you deviated
  - (ii) Information on the number, duration, and cause of deviations (including unknown cause) and the corrective action taken.
  - (iii) If the deviation occurs during an annual performance test, provide the date the annual performance test was completed.
- (k) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report



- (l) Results of any performance tests and compliance reports identified in 40 CFR §63.7550(h)(1) through (3) shall be submitted to EPA's WebFIRE database using the Compliance and Emissions Data Reporting Interface that can be accessed through EPA's Central Data Exchange (CDX – [www.epa.gov/cdx](http://www.epa.gov/cdx)) unless the reporting form specific to this subpart is not available in CEDRI at the time that the report is due. All performance tests and compliance reports identified in 40 CFR §63.7550(h)(1) through (3) shall also be submitted to MDEQ.

(Ref.: 40 CFR §63.7550(a),(b),(c), (d), and (h) and Table 9 of Subpart DDDDD))

5.C.3 For Emission Points AA-001 and AA-002, a compliance extension was granted by MDEQ on November 24, 2015, extending the compliance date for Subpart DDDDD to January 31, 2017, contingent on the permittee completing (a) through (c) below:

- (a) Submit information detailing any and all construction activities necessary to comply with Subpart DDDDD in accordance with Condition 5.A.4. This information shall include all construction activities that have occurred in the previous six months and shall begin November 24, 2015.
- (b) Provide our office with a notification of the date construction is completed within 5 days of such date.
- (c) Provide our office with a notification of the date the boilers achieve compliance within 5 days of such date. The compliance extension for the boilers expires once this notice is provided to MDEQ.

(Ref.: 40 CFR 63.6(i)(4)(i)(C) and Compliance Extension Approval Letter in Appendix B)

5.C.4 The permittee shall submit a semi-annual report detailing the process throughput for Emission Point AA-006 and AA-007 on a daily basis and a 12-month rolling total within 30 days of the end of the semi-annual reporting period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a).)

5.C.5 For Emission Point AA-004, the permittee shall submit semi-annual monitoring reports to demonstrate compliance with the facility's CAM plan, in accordance with Condition 5.A.4. This report shall include, at a minimum,

- (a) summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken;
- (b) summary information on the number, duration, and cause for monitor down time incidents (other than downtime associated with calibration checks);
- (c) Description of the actions taken to implement a Quality Implementation Plan (QIP) during the reporting period. (40 CFR 64.9(a))

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale,  
and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

## APPENDIX A

### List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound