

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Vicksburg Forest Products LLC, Waltersville Lumber Mill
1725 North Washington Street
Vicksburg, Mississippi
Warren 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: March 25, 2016

Modified: MAY 24 2018 (ownership change / name change)

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: February 28, 2021

Permit No.: 2780-00004

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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 ordnance. 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	Woodwaste Handling System, equipped with 4 baghouses and 1 cyclone.
AA-002	94.8 MMBTU/hr Woodwaste Fired Boiler
AA-004*	Portable Boiler (Natural Gas fired ≤ 65 MMBTU/hr, No. 2 Fuel Oil ≤ 48.72 MMBTU/hr)
AA-006	Sawing Operations including log debarking, sawing, hogging, chipping, and grinding.
AA-007	Fugitive Emissions from In-Plant Road Dust
AA-009	Lumber Treatment Station. Lumber is dipped in a fungicide, insecticide, and iron stain inhibitor solution.
AA-010	All Group 1 Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping.
AA-013	Truck Loadout Operation, 20 TPH capacity. This includes a diversion valve from the Woodwaste Handling System, AA-001, baghouse bottoms, woodwaste generated from sawmill operations, and all fuel handling belts, conveyors, and truck loading equipment.
AK-001 through AK-028	28 Hardwood Lumber Dry Kilns

***Note:** Emission point AA-004 is a general emission point. The permittee is allowed to install up to two (2) portable boilers with combined capacity of less than or equal to 65 MMBTU/hr for natural gas burning units, and less than or equal to 48.72 MMBTU/hr for No. 2 Fuel Oil burning units. The permittee is limited herein to specific requirements of monitoring, reporting, and testing.

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	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-006 AA-007 AA-013	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).	3.B.1 3.A.2	PM	$E = 4.1 p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.		Opacity	40%
AA-002	Construction Permit issued on May 24, 1998, and Modified September 17, 1999. 11 Miss. Admin. Code Pt. 2, R. 1.3. D(2). 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). 11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.B.2 3.B.3 3.B.4 3.A.2	PM	0.30 gr/dscf, not to exceed 45.6 lb/hr, 199.7 tpy
			Opacity	40%
			SO ₂	4.8 lb/MMBTU, not to exceed 2.3 lb/hr, 10.1 tpy
			NO _x	30.0 lb/hr, 131.4 tpy
			CO	23.2 lb/hr, 101.6 tpy
			VOC	8.0 lb/hr, 36.0 tpy
			Fuel Limitation	Woodwaste Only, as defined in condition 3.B.3
AA-004 Scenario 1	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b). 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). Construction Permit issued on July 26, 1994, Beginning on installation of the unit. These requirements are applicable if the steam generating unit(s) was constructed, modified, or reconstructed before June 9, 1989, or if the maximum design heat capacity is less than 10 MMBTU/hr (40 CFR 60, Subpart Dc)	3.B.5 3.B.4 3.B.6 3.B.7 3.B.8 3.B.9 3.B.10	PM/PM ₁₀	$E = 0.8808*(I)^{-0.1667}$ lb/MMBTU or 0.6 lb/MMBTU, not to exceed 0.696 lb/hr, 1.33 tpy
			SO ₂	4.8 lb/MMBTU, not to exceed 34.71 lb/hr, 38.98 tpy
			NO _x	6.96 lb/hr, 29.88 tpy
			CO	1.74 lb/hr, 7.47 tpy
			VOC	0.283 lb/hr, 1.25 tpy
			Fuel Limitation	If Burning No. 2 Fuel Oil, 1,098,592 gal/yr and < 0.5% Sulfur by weight
			Capacity	If Burning Natural Gas, ≤ 65.0 MMBTU/hr If Burning No. 2 Fuel Oil, ≤ 48.72 MMBTU/hr
AA-004	11 Miss. Admin. Code Pt.	3.B.5 3.B.4	PM/PM ₁₀	$E = 0.8808*(I)^{-0.1667}$ lb/MMBTU or 0.6 lb/MMBTU, not to exceed 0.696 lb/hr,

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Scenario 2	2, R. 1.3. D(1)(b). 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). Construction Permit issued on July 26, 1994, Beginning on installation of the unit. These requirements are applicable if the steam generating unit(s) was constructed, modified, or reconstructed on or after June 9, 1989, and if the maximum design heat capacity is greater than or equal to 10 MMBTU/hr (40 CFR 60, Subpart Dc)	3.B.6 3.B.7 3.B.8 3.B.9 3.B.10		1.33 tpy
			SO ₂	4.8 lb/MMBTU, not to exceed 34.71 lb/hr, 38.98 tpy
			NO _x	6.96 lb/hr, 29.88 tpy
			CO	1.74 lb/hr, 7.47 tpy
			VOC	0.283 lb/hr, 1.25 tpy
			Fuel Limitation	If Burning No. 2 Fuel Oil, 1,098,592 gal/yr and < 0.5% Sulfur by weight
			Capacity	If Burning Natural Gas, ≤ 65.0 MMBTU/hr
				If Burning No. 2 Fuel Oil, ≤ 48.72 MMBTU/hr
			Opacity	If Burning Natural Gas, ≤ 40% opacity
				If Burning Fuel Oil, ≥ 30 MMBTU/hr, ≤ 20% opacity
				If Burning Fuel Oil, ≥ 10 MMBTU/hr and < 30 MMBTU/hr, ≤ 40% opacity
AA-010 and AK-001 through AK-028	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD	3.B.11	Applicability	40 CFR 63.2231 and 40 CFR 63.2232
AA-002	National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources	3.B.12	Applicability	40 CFR 63.11193

3.B.1 For Emission Points AA-001, AA-006, AA-007, and AA-013, except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).)

- 3.B.2 Emission Point AA-002 is limited by the Construction Permit issued on May 24, 1988, and modified September 17, 1999.
- 3.B.3 For Emission Point AA-002, fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge, to produce steam or heat water or any other transfer medium through indirect means may be allowed emission rates up to 0.30 grains per standard dry cubic foot. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(2).)
For the purpose of this permit only, wood fuel includes: bark, dip tank sludge, spent wood, wax coated end cuts, wood fragments, and waste generated from mechanical woodworking operations (debarking, sawing, planning, etc) including wood pieces containing oil drippings from the machinery. (Ref.: Title V permit issued on September 17, 1999)
- 3.B.4 For Emission Points AA-002 and AA-004, except as otherwise specified or limited herein, 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.5 For Emission Points AA-004, otherwise specified or limited herein, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b).)

- 3.B.6 Beginning upon installation, Emission Point AA-004 is limited by the Construction Permit issued on July 26, 1994. (Ref.: Construction Permit issued on July 26, 1994)
- 3.B.7 For Emission Point AA-004, beginning upon installation, the permittee may use up to two boilers with a combined capacity of no greater than 65.0 MMBTU/hr if the boilers are natural gas fired. The permittee can operate said boilers with no limits on the

amount of natural gas used or the amount of hours the boilers are operated. These emission units can only be operated during periods of shutdown of Emission Point A-002. (Ref.: Construction Permit issued July 26, 1994 and Title V Operating Permit issued on April 13, 2005)

- 3.B.8 For Emission Point AA-004, beginning upon installation, the permittee may use up to two boilers with a combined capacity of no greater than 48.72 MMBTU/hr if the boilers are fired with No. 2 fuel oil. The No. 2 fuel oil must contain less than 0.5% sulfur by weight, and the permittee must not use more than 1,098,592 gal/yr of No. 2 fuel oil on a 365 day rolling period. These emission units can only be operated during periods of shutdown of Emission Point AA-002. (Ref.: Construction Permit issued July 26, 1994 and Title V Operating Permit issued on April 13, 2005)
- 3.B.9 For Emission Point AA-004, the permittee shall determine applicability of 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and comply with the emission limitations therein, if subject. (Ref.: 40 CFR 60.40c)
- 3.B.10 For Emission Point AA-004, if subject to 40 CFR 60, Subpart Dc, burning fuel oil, and with a rated heat capacity of greater than or equal to 30 MMBTU/hr, the permittee shall not cause gases to be discharged to the atmosphere that exhibit greater than 20% opacity (six (6) minute average), except for one six (6) minute period per hour of not more than 27% opacity. If subject to 40 CFR 60, Subpart Dc, burning fuel oil, and with a rated heat capacity of greater than or equal to 10 MMBTU/hr and less than 30 MMBTU/hr, the permittee shall not cause gases to be discharged to the atmosphere that exhibit greater than 40% opacity (Ref.: 40 CFR 60.43c(c))
- 3.B.11 Emission Points AA-010 and AK-001 through AK-028 are subject to the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD. These emission points, excluding AA-010, are affected sources per Section 63.2231(a) of the rule; however, the only applicable requirement for these emission points was the initial notification. There are no other applicable monitoring, recordkeeping or reporting requirements for these emission points in Subpart DDDD. There are work practice standards in Section 3.D for Emission Point AA-010. (Ref.: 40 CFR 63.2231 and 40 CFR 63.2232)
- 3.B.12 Emission Point AA-002 is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJ. Emission Point AA-002 is an existing boiler in the “biomass” subcategory as listed in 40 CFR 63.11200(b) and defined in 63.11237.

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 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2 & 1.19	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions
11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.C.3	PM	$E = 4.1 (p)^{0.67}$

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).)

3.C.3 Except as otherwise specified, 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

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

D. Work Practice Standards

- 3.D.1 For Emission Point AA-010, the permittee shall only use non-HAP containing coatings in all Group 1 Miscellaneous Coating operations. (Ref.: 40 CFR 63.2241 and Table 3 of Subpart DDDD)
- 3.D.2 For Emission Point AA-002, the permittee must have a one-time energy assessment performed by a qualified energy assessor no later than March 21, 2014, as specified in §63.11196(a)(3). An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements as described in Table 2 of 40 CFR 63, Subpart JJJJJ, satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. Operating under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (a) to (d) appropriate for the on-site technical hours listed in §63.11237, and a copy of the energy assessment must be kept on site:
- (a) A visual inspection of the boiler system,
 - (b) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,
 - (c) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the permittee,
 - (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
 - (e) A list of major energy conservation measures that are within the permittee's control,
 - (f) A list of the energy potential of the energy conservation measures identified, and
 - (g) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- 3.D.3 For Emission Point AA-002, the permittee must conduct an initial tune-up as specified in §63.11214 by March 21, 2014, as specified in §63.11196(a)(1), and conduct a tune-up of the boiler biennially as specified in §63.11223. The tune-up must be conducted while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. The permittee must conduct a tune-up of the

boiler biennially to demonstrate continuous compliance as specified in (a) through (g) below. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (burner inspection may be delayed until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (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 (inspection may be delayed until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide 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.
- (f) Maintain on-site and submit, if requested by MDEQ, a report containing the information in (1) through (3) below:
 - (1) 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.
 - (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (3) 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.
- (g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

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).)

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)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.1	PM	Hours of operation and daily throughput
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.2	Operation and Maintenance	Pressure drop across the baghouse
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.3	Operation and Maintenance	Weekly maintenance inspections
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.4	Opacity	Weekly opacity observations
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.B.5	PM, SO ₂ , NO _x , CO, and VOC	Biennial stack testing
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.B.6	Steam Production	Maintain records to document the daily average and the annual steam production rate based on a 365-day rolling total.
AA-004, when burning fuel oil	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.B.7	SO ₂	Sulfur content of the fuel oil
AA-004, when burning fuel oil	40 CFR 60.40c	5.B.8	Applicability	Determination of applicability of 40 CFR 60 Subpart Dc, and compliance with applicable requirements
AA-004, when burning fuel oil	Title V Permit issued September 17, 1999	5.B.9	PM, SO ₂ , NO _x , CO, and VOC	Stack testing
AA-004, when burning natural gas	Title V Permit issued September 17, 1999	5.B.10	NO _x and CO	Stack testing
AA-004, when burning natural gas	Title V Permit issued September 17, 1999	5.B.11	Heat input rate	Limit on the heat input rate allowed when burning natural gas
AA-004	Title V Permit issued September 17, 1999	5.B.12	Oil usage	Gallons used on daily and 365 rolling total basis

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-013	Title V Permit issued September 17, 1999	5.B.13	Fuel diverted to the truck loadout operation	Monthly records of fuel diverted to the Truck Loadout Operations
AA-002	40 CFR 63.11225(c)(1)	5.B.14	Applicability	Recordkeeping requirements
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.15	Opacity	Daily opacity observations

5.B.1 For Emission Point AA-001, the permittee shall record the total hours operated daily and the board feet of lumber processed on a daily basis. The records shall be kept on file at the facility for five (5) years and shall be made available upon request by Office of Pollution Control personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.2 For Emission Point AA-001, the permittee shall install measuring devices as necessary for monitoring and/or measurement of pressure drop across the baghouse control systems. Pressure drops shall be monitored and recorded in a log on a daily basis. These records must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. A summary of the records shall be submitted in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.3 For Emission Points AA-001, the permittee shall perform regular maintenance weekly or more often if necessary to maintain proper operation of the pollution control equipment. Records of this maintenance shall be kept in log form and made available for review upon request, and a summary report shall be submitted in accordance with 5.A.4.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair the pollution control equipment. (11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.4 For Emission Points AA-001, the permittee shall perform weekly opacity observations and maintain a log of the results. If any visible emissions are observed, the permittee shall:

- (1) Perform an opacity evaluation, in accordance with EPA Reference Method 9, 40 CFR 60, Appendix A. If conditions are such that opacity readings cannot be taken using Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations.

- (2) Take corrective action to eliminate or minimize the visible emissions,

- (3) Record the nature and cause of the visible emissions;
- (4) Record the corrective action taken or preventative measure adopted to minimize the occurrence of visible emissions;
- (5) Within 24 hours of any corrective action/preventative measure being put into effect, verify and record that emission point has returned to its normal operation.

The permittee shall submit a summary report of the required monitoring in accordance with Section 5.A.4 of this document (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.B.5 For Emission Point AA-002, the permittee is required to perform stack testing for particulate matter, sulfur dioxide, oxides of nitrogen, carbon monoxide, and volatile organic compounds in accordance with EPA Reference Methods 1-5, 6, 7, 10, and 25A, respectively, to demonstrate compliance with the permitted emission limitations. The permittee shall demonstrate compliance by stack testing and submit stack test reports by August 30, 2010, and biennially thereafter.

Performance tests shall be conducted under representative operating conditions for Emission Point AA-002. Samples shall be taken in such number, duration, and location as to be statistically significant and representative of performance conditions for which compliance is to be demonstrated by the test(s).

DEQ may require the permittee to retest if maximum production rates exceed 10 percent or more of representative operating conditions that occurred during the compliance 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. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of a 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))

- 5.B.6 For Emission Point AA-002, the permittee shall maintain records to document the daily average and the annual steam production rate based on a 365-day rolling total (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))
- 5.B.7 For Emission Point AA-004, the permittee shall maintain records at the facility of the sulfur content in the fuel oil from each lot or shipment received. The reports shall be submitted in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))
- 5.B.8 For Emission Point AA-004, the permittee shall determine applicability of 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and comply with the standards, monitoring, recordkeeping, and reporting requirements therein, if subject. (Ref.: 40 CFR 60.40c)

(a) Applicability

The affected source to which 40 CFR 60 Subpart Dc applied is each steam generating

unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 million BTU per hour (BTU/hr) or less, but greater than or equal to 10 million BTU/hr. (Ref.: 40 CFR 60.40c(a))

(b) Standards for Sulfur Dioxide

The affected source which burns fuel oil is limited to less than 0.5 weight percent sulfur. Compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described below. Fuel supplier certification shall include the following information:

- (i) The name of the oil supplier; and
- (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.
- (iii) The sulfur content of the oil from which the shipment came (or of the shipment itself); and
- (iv) The method used to determine the sulfur content of the oil. (Ref.: 40 CFR 60.42c)

(c) Standards for Particulate Matter

No owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 30 million BTU/hr or greater shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. (Ref.: 40 CFR 60.43c(c))

(d) Compliance and Performance Test Methods and Procedures for Particulate Matter

Method 9 (6-minute average of 24 observations) shall be used for determining the opacity of stack emissions. (Ref.: 40 CFR 60.45c(a)(7))

(e) Reporting and Recordkeeping Requirements

- (i) The owner or operator of the affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

- (ii) The owner or operator of the affected facility shall monitor and record each fuel combusted during the day. (Ref.: 40 CFR 60.48c)

- 5.B.9 For Emission Point AA-004, if burning No. 2 fuel oil, the permittee shall perform stack testing for particulate matter, sulfur dioxide, oxides of nitrogen, carbon monoxide, and volatile organic compounds in accordance with EPA Reference Methods 1-5, 6, 7, 10, and 21, respectively, to demonstrate compliance with the permitted emission limitations. For the purpose of compliance demonstration the permittee shall operate the source within 80% of the maximum capacity allowed under Condition 3.B.8 of this permit. The testing shall be performed within 60 days of installation, following 6 consecutive days of operation, and biennially thereafter. This requirement shall not be applicable if the unit is removed from the site within 45 days of installation.

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 scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s). (Ref.: Title V Permit issued September 17, 1999)

- 5.B.10 For Emission Point AA-004, if burning natural gas, the permittee shall perform stack testing for oxides of nitrogen, and carbon monoxide in accordance with EPA Reference Methods 7 and 10, respectively, to demonstrate compliance with the permitted emission limitations. For the purpose of compliance demonstration the permittee shall operate the source within 80% of the maximum capacity allowed under Condition 3.B.7 of this permit. The testing shall be performed within 60 days of installation, following 6 consecutive days of operation, and biennially thereafter. This requirement shall not be applicable if the unit is removed from the site within 45 days of installation.

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. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s). (Ref.: Title V Permit issued September 17, 1999)

- 5.B.11 For Emission Point AA-004, the permittee may use up to 65.0 MMBTU/hr when the boiler(s) is fired with natural gas and can operate that boiler with no limits on the amount of natural gas used or the amount of hours the boiler is operated. (Ref.: Title V Permit issued September 17, 1999)

- 5.B.12 For Emission Point AA-004, the permittee shall maintain records of the number of gallons per year of No. 2 fuel oil used on a daily basis and on a 365 day rolling period. (Ref.: Title V Permit issued September 17, 1999)

- 5.B.13 For Emission Point AA-013, the permittee shall maintain a monthly record, in log form, of the amount of fuel diverted to the Truck Loadout Operation (Ref.: Title V Permit issued September 17, 1999)

- 5.B.14 For Emission Point AA-002, the permittee shall keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart JJJJJ, and all documentation

supporting any Initial Notification or Notification of Compliance Status submitted (Ref.: 40 CFR 63.11225(c)(1))

- 5.B.15 For Emission Point AA-002, the permittee shall assure compliance with the opacity limitations by having a certified observer perform daily opacity evaluations in accordance with EPA Reference Method 9, 40 CFR 60, Appendix A, and maintain a log of the results. If conditions are such that opacity readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. The permittee shall submit a summary report of the required monitoring in accordance with Section 5.A.4 of this document (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.C.1	Steam Production	Steam Production Rate Report
AA-004	Title V Permit issued September 17, 1999	5.C.2	Fuel Usage	Fuel Usage Report
AA-004	Title V Permit issued on April 13, 2005	5.C.3	Notification Requirements	Notification of installation, removal, and operation of portable boiler
AA-004	Title V Permit issued on April 13, 2005	5.C.4	Notification Requirements	Size of portable boiler
AA-001 AA-004 AA-013	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)	5.C.5	Semi-Annual Report	Submittal of Semi-Annual Report
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.C.6	PM, SO ₂ , NO _x , CO, and VOC	Submittal of Stack Test Report
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	5.C.7	PM, SO ₂ , NO _x , CO, and VOC	Submittal of Stack Test Report
AA-002	40 CFR 63.11225(b)	5.C.8	Applicability	Reporting requirements

- 5.C.1 For Emission Point AA-002, the permittee shall submit a semi-annual report summarizing the steam production rate. The report shall be submitted in accordance with 5.A.4 of this document.

- 5.C.2 For Emission Point AA-004, the permittee shall submit fuel usage reports in accordance with 5.A.4. These reports should include fuel type, quantity and quality, including sulfur content (% by weight); and the heating value (BTU/gal) of all fuels burned. (Ref.: Title V Permit issued September 17, 1999)
- 5.C.3 For Emission Point AA-004, the permittee shall report to the Department of Environmental Quality (DEQ) each time a portable boiler is installed, operated, or removed. This report shall be submitted seven (7) days prior to the incident. (Ref.: Title V Permit issued on April 13, 2005)
- 5.C.4 For Emission Point AA-004, the permittee shall also report to the DEQ the size (capacity) of the portable boiler(s) put in place. This report should be submitted within seven (7) days of installation. (Ref.: Title V Permit issued on April 13, 2005)
- 5.C.5 The permittee shall submit to the Office of Pollution Control a semi-annual report, in accordance with 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1) and Condition 5.A.4 of this permit. This report shall include:
- (1) For Emission Point AA-001, a summary of the hours of operation on a monthly basis and a summary of the board feet of lumber process on a monthly basis.
 - (2) For Emission Point AA-001, a summary of the pressure drop readings taken across the baghouse. The summary shall include the minimum, maximum, and average readings for every month in the reporting period.
 - (3) For Emission Point AA-001, a summary of the weekly maintenance inspections performed on the pollution control equipment. If the repairs were performed during the reporting period, details regarding those activities should be included in the report.
 - (4) For Emission Points AA-001, a summary of the daily opacity observations performed, a summary of any Method 9 observations performed, as well as a summary of any corrective action taken to minimize visible emissions, as required by Condition 5.B.4 of this permit.
 - (5) For Emission Point AA-004, records of the sulfur content for each load or shipment of fuel oil.
 - (6) For Emission Point AA-004, the gallons of No. 2 fuel oil used on daily basis and 365 day rolling total.
 - (7) For Emission Point AA-013, a summary of the amount of fuel diverted to the truck loadout operation, on a monthly basis.

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

- 5.C.6 For Emission Point AA-002, the permittee shall submit a stack test report, by the date outlined in Condition 5.B.5 of this permit (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))
- 5.C.7 For Emission Point AA-004, as applicable, the permittee shall submit a stack test report, by the date outlined in Condition 5.B.9 and 5.B.10 of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))
- 5.C.8 For Emission Point AA-002, the permittee must prepare a biennial compliance report by March 1, and submit to MDEQ upon request, for the previous calendar years containing the information below:
- (a) Company name and address;
 - (b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63, Subpart JJJJJJ. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (1) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up, as applicable, for each boiler."
 - (2) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(Ref.: 40 CFR 63.11225(b))

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
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	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 ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound