

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

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

Weyerhaeuser NR Company, Philadelphia Facility
1016 Weyerhauser Road
Neshoba County
Philadelphia, Mississippi

has been granted permission to construct air emissions equipment to comply with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: **March 17, 2005**

Permit No.: 1920-00012

Modified: **May 22, 2008 and FEB 13 2009** *transferred from Weyerhaeuser Company*

Part I
GENERAL CONDITIONS

1. Any activities not identified in the application are not authorized by this permit.
2. All air pollution control facilities shall be designed and constructed such as to allow proper operation and maintenance of the facilities.
3. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.
4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10.
5. The construction of facilities shall be performed in such a manner as to reduce both point source and fugitive dust emissions to a minimum.
6. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.
7. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emission.
8. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control.

9. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
10. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances.
11. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.
12. This permit is for air pollution control purposes only.
13. Approval to construct will expire should construction not begin within eighteen (18) months of the issuance of this permit, or should construction be suspended for eighteen (18) months.

Part II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning May 22, 2008, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-001, the 140 MMBTUH wood fired boiler with two multicyclones with a flyash reinjection system. This modification includes removal of the steam production limitation and allows full utilization of the equipment capacity.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

Particulate Matter	0.3 gr/dscf, not to exceed 83.0 lbs/hr and 363.54 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
PM ₁₀	83.0 lbs/hr and 363.54 tons/year as determined by EPA Reference Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M. EPA Method 5 may be used in place of Method 201 or 201A with the assumption that all of the PM is PM ₁₀ .
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect May 22, 2008.

NEW SOURCE PERFORMANCE STANDARDS 40 CFR PART 60.48c

The permittee shall record and maintain records of the amounts of each fuel combusted during each day. All records must be maintained on-site for a period of two years following the date of such record. (Ref.: 40 CFR 60.48c(g) & (j))

NESHAP 40 CFR PART 63

The permittee is subject to 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5. The permittee shall demonstrate compliance by December 31, 2009, and biennially thereafter. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity.

Part II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS
(Emission Point AA-002 Continued)

DEMONSTRATION OF COMPLIANCE
(Continued)

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall annually perform a chemical analysis of the oil absorbent material to determine if it is a hazardous waste. The sample that is analyzed should be representative of what is normally combusted in the boilers. These records shall be kept on site for a period of five (5) years. The permittee shall submit reports of the analysis by January 31 of each calendar year. 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 APC-S-6, Section II.E

EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning **March 17, 2005**, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-002, the 28.9 MMBTUH wood residue fired boiler with two multicyclones in series with a flyash reinjection system. This modification includes removal of the steam production limitation and allows full utilization of the equipment capacity.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

Particulate Matter	0.3 gr/dscf, not to exceed 8.7 lbs/hr and 37.99 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
PM ₁₀	8.7 lbs/hr and 37.99 tons/year as determined by EPA Reference Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M. EPA Method 5 may be used in place of Method 201 or 201A with the assumption that all of the PM is PM ₁₀ .
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect **March 17, 2005**.

NEW SOURCE PERFORMANCE STANDARDS 40 CFR PART 60.48c

The permittee shall record and maintain records of the amounts of each fuel combusted during each day. All records must be maintained on-site for a period of two years following the date of such record. (Ref.: 40 CFR 60.48c(g) & (j))

NESHAP 40 CFR PART 63

The permittee is subject to 40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5. The permittee shall demonstrate compliance by December 31, 2009, and biennially thereafter. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity.

Part II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS
(Emission Point AA-002 Continued)

DEMONSTRATION OF COMPLIANCE
(Continued)

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall annually perform a chemical analysis of the oil absorbent material to determine if it is a hazardous waste. The sample that is analyzed should be representative of what is normally combusted in the boilers. These records shall be kept on site for a period of five (5) years. The permittee shall submit reports of the analysis by January 31 of each calendar year. 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 APC-S-6, Section II.E

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning **March 17, 2005**, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-015, Kiln No. 1, Kiln No. 2, Kiln No. 3, and Kiln No. 4. This PSD Construction permit authorizes maximum combined annual lumber drying rate for all kilns to 260,000 MBF/yr.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

- | | |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| *Particulate Matter | 0.25 lb/MBF and 32.5 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. |
| *Volatile Organic Compounds | 4.53 lbs/MBF and 589 tons/year, as determined by EPA Reference Method 25A, 40 CFR 60, Appendix A, and reported as terpenes. (Or by EPA Test Method 26 (OTM 26)- VOC Measurement for the Wood Products Industry, but the additional analysis for methanol and formaldehyde is un-necessary for southern pine lumber kilns. |
| Opacity | 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A. |

- * The emission limitation for the tons/year number is the total for all four kilns.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect **March 17, 2007**.

OPERATIONAL RESTRICTIONS

The total maximum annual lumber drying rate for all kilns is limited to 260,000 MBF/yr, based on a twelve month consecutive period.

NESHAP 40 CFR PART 63

The permittee is subject to 40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products Manufacture.

Part II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS
(Emission Point AA-015 Continued)

MONITORING & RECORDKEEPING REQUIREMENTS

The permittee shall monitor the total amount of lumber dried through all the kilns on a monthly period.

The permittee shall record the total lumber dried on a monthly period and on a twelve month consecutive period.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning **March 17, 2005**, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-033, the Fuel House – Green Fiber Cyclone.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

PM/PM ₁₀	0.01 lb/MBF based on a 3 hour average and 1.3 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. or with Oregon Department of Environmental Quality Method 8
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect **March 17, 2005**.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8. The permittee shall demonstrate compliance and submit the stack test report within 180 days of the modification. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point.

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning **March 17, 2005**, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-034, the Green Chip Truck Bin Cyclone.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

PM/PM ₁₀	0.038 lb/MBF based on a 3 hour average and 4.9 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. or with Oregon Department of Environmental Quality Method 8
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect **March 17, 2005**.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8. The permittee shall demonstrate compliance and submit the stack test report within 180 days of the modification. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point.

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation.

Part II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning May 22, 2008, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-036, the Primary Planer Shavings Cyclone.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

PM / PM ₁₀	0.038 lb/MBF based on a 3 hour average and 4.9 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. or with Oregon Department of Environmental Quality Method 8
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect May 22, 2008.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8. The permittee shall demonstrate compliance and submit the stack test report within 180 days of the modification. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point.

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation.

PART II
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning May 22, 2008, the permittee is authorized to construct modifications to air emissions equipment for the emission of air contaminants from Emission Point AA-037, the Planer Trim Hog Cyclone.

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified below.

EMISSION LIMITATIONS

PM / PM ₁₀	0.022 lb/MBF based on a 3 hour average and 2.9 tons/year, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A. or with Oregon Department of Environmental Quality Method 8
Opacity	40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect May 22, 2008.

DEMONSTRATION OF COMPLIANCE

The permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8. The permittee shall demonstrate compliance and submit the stack test report within 180 days of the modification. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point.

The permittee shall perform visible emission observations on a weekly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years.

The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation.

Part III
OTHER REQUIREMENTS CONTINUED

OPERATIONAL RESTRICTIONS

1. The permittee is restricted to a maximum annual green lumber usage rate of 260,000 MBF/yr, based on a twelve month consecutive period.

MONITORING & RECORDKEEPING REQUIREMENTS

2. The permittee shall monitor and record the total amount of green lumber processed on a monthly period.
3. The permittee shall record the total amount of green lumber processed on a monthly period and on a twelve month consecutive period.
4. The permittee shall maintain all records required by this permit on site for a period of five (5) years.

REPORTING REQUIREMENTS

5. The permittee shall submit all reports required by this permit by July 31 and January 31 for the preceding twelve-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 APC-S-6, Section II.E.

GENERAL DEMONSTRATION OF COMPLIANCE REQUIREMENTS

6. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.
7. After the first successful submittal of an initial written test protocol for each emission point, the permittee may request that the submittal 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.
8. For all emission points, except emission point AA-002 (which was never included in the original PSD Authority to Construct Permit), this PSD Authority to Construct supercedes the requirements established in the original PSD Authority to construct issued January 10, 1995, and modified June 13, 1995, September 26, 1995, April 23, 1996, October 22, 1996, and August 27, 1997.