

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
PERMIT  
AND PREVENTION OF SIGNIFICANT  
DETERIORATION (PSD) AUTHORITY**

**TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Hankins Lumber Company Inc., Elliott  
496 Nat G Trout Road  
Elliott, Grenada County, Mississippi

**“New Steam-Heated, Indirect-Fired Continuous Lumber Drying Kiln”**

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

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

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**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: September 27, 2018**

**Permit No.: 0960-00010**

**Modified: \_\_\_\_\_**

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.2 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.3 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.4 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including (but not limited to) all required local government zoning approvals or permits.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.5 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.6 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.7 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.8 The permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

- 1.9 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the MDEQ 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 MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

- 1.11 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.12 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

- 1.13 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

- 1.14 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality, Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives, upon presentation of credentials:

- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

(Ref.: Miss. Code Ann. 49-17-21)

- 1.15 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to, the following:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

- 1.16 *Public Record and Confidential Information:* Except for information determined to be confidential under the Mississippi Air and Water Pollution Control Law, all information obtained in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

- 1.17 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

- 1.18 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

- 1.19 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The MDEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

- 1.20 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

- 1.21 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

- 1.22 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit (whichever is applicable) is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

- 1.23 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
  - (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source 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.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B(2)(a) through (e).
  - (3) Where an upset (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.) occurs during start-up or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.25 *General Duty:* All air emission equipment shall be operated as efficiently as possible to minimize emissions of air contaminants.

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

- 1.26 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) Detailed description of testing procedures;
  - (2) Sample calculation(s);
  - (3) Results; and

- (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)



## SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and/or modify and operate, upon certification of construction, air emissions equipment, as described in the following table:

EMISSION POINT	DESCRIPTION
AA-100	Facility-Wide (Hankins Lumber Company Inc., Elliot)
AA-001	No. 1 Erie City 65 MMBTU/Hour Wood Waste-Fired Boiler [equipped with a multiclone that is inherent to the operation of the boiler]
AA-002	No. 2 Bigelow 23 MMBTU/Hour Wood Waste-Fired Boiler [equipped with an ash arrestor that is inherent to the operation of the boiler]
AA-003	Log Debarking and Green End Sawmill Operations
AA-004	Fuel Cyclone [pneumatically transfers dry shavings and hogged trim from the Planer Cyclone to the Shavings Bin Truck Load-Out Area]
AA-006	Two (2) Steam-Heated, Indirect-Fired Batch Lumber Drying Kilns <b>[Kiln No. 1 removed]</b>
AA-007	One (1) Steam-Heated, Indirect-Fired Batch Lumber Drying Kiln
AA-008	Planer High-Efficiency Cyclone [pneumatically conveys dry shavings from the Planer Mill and hogged trim from the Hogger Cyclone to the Fuel Cyclone]
AA-009	Hogger High-Efficiency Cyclone [pneumatically conveys hogged trim to the Planer Cyclone]
AA-010	One (1) Steam-Heated, Indirect-Fired Continuous Lumber Drying Kiln <b>[New]</b>

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	VOCs PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Existing Process Unit Decommission Requirements
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j)	3.2	VOCs	4.09 lbs/Mbd-ft; and 100.50 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). <b>PSD Avoidance Limit</b>	3.3	Dried Lumber Throughput PM / PM <sub>10</sub> / PM <sub>2.5</sub>	49,140,903 bd-ft/year (Combined Total for All Kilns) (Rolling 12-Month Total)
AA-010	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.4	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 2.3.B.	3.5		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.6	PM (filterable only)	$E = 4.1(p^{0.67})$
	40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR 63.2231 and 63.2252, Subpart DDDD	3.7	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	VOCs	New Unit Shakedown Requirement
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) <b>PSD BACT Limits</b>	3.9	VOCs	4.804 lbs/Mbd-ft; and 243.46 tpy (Rolling 12-Month Total)
		3.10	Dried Lumber Throughput	101,359,097 Board Feet / Year (Rolling 12-Month Total)

3.1 For Emission Point AA-006, the permittee shall decommission Kiln No. 1 of this emission point designation no later than fifteen (15) days after completing the shakedown of the new

indirect-fired continuous lumber drying kiln (Emission Point AA-010) as detailed in Condition 3.8.

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

- 3.2 For Emission Points AA-006 and AA-007, the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 4.09 pounds per thousand board feet (lb/Mbd-ft) from each kiln. Additionally, VOC emission from all combined kilns shall not exceed 100.50 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j))

- 3.3 For Emission Points AA-006 and AA-007, the permittee shall limit the combined total lumber throughput of all kilns to no more than 49,140,903 board feet per year (bd-ft/year) based on a rolling 12-month total.

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

- 3.4 For Emission Point AA-010, except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from any point source into the open air from the kiln which exceeds forty percent (40%) opacity subject to the exceptions provided below:
- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

- 3.5 For Emission Point AA-010, the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

- 3.6 For Emission Point AA-010, except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from the kiln (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

- 3.7 For Emission Point AA-010, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

With the exception of an initial notification requirement, the permittee is not required to comply with any compliance options, work practice requirements, performance testing, monitoring, recordkeeping, or reporting requirements found in Subpart DDDD or any other requirements found in Subpart A.

For Emission Point AA-010, the initial notification requirement was satisfied with the submission of this application for a PSD Permit to Construct Air Emissions Equipment.

(Ref.: 40 CFR 63.2231(a), (b) and 40 CFR 63.2252, Subpart DDDD).

- 3.8 For Emission Point AA-010, the permittee may execute a shakedown of the kiln that shall not exceed more than one hundred eighty (180) days after the initial start-up.

For the purpose of this permit, “shakedown” shall be defined as the period beginning with initial start-up and ending no later than the successful completion of operational testing during which the permittee may conduct operational and contractual testing / tuning to ensure the safe, efficient, and reliable operation of the new kiln.

A process unit shall be considered operational after completion of the shakedown period.

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

- 3.9 For Emission Point AA-010, the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 4.804 pounds per thousand board feet (lb/Mbd-ft). Additionally, VOC emissions from the kiln shall not exceed 243.47 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) – PSD BACT Limit)

- 3.10 For Emission Point AA-010, the permittee shall limit the total throughput of lumber dried in the kiln to no more than 101,359,097 board feet per year (bd-ft/year) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) – PSD BACT Limit)



**SECTION 4. WORK PRACTICE STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Work Practice
AA-010	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j)  (PSD BACT Standard)	4.1	VOCs	Develop, Implement, and Maintain a Good Work Practices Plan

- 4.1 For Emission Point AA-010, the permittee shall operate and maintain the kiln in accordance with the manufacturer's recommendations and good work practices.

Additionally, the permittee shall develop, implement, and maintain a "Good Work Practices Plan" that establishes work practice standards in accordance with the manufacturer's recommendations for the proper operation and maintenance of the indirect-fired continuous dry kiln. The plan shall establish a routine for conducting preventative maintenance on the kiln that includes (at a minimum) the following actions:

- (a) Conducting walk-around inspections;
- (b) Confirming proper wet-bulb operation;
- (c) Conducting entrance / exit baffle inspections;
- (d) Checking wet-bulb wicks for integrity;
- (e) Greasing the kiln cart wheels and fan shaft bearings;
- (f) Checking hydraulic oil levels;
- (g) Calibrating moisture content equipment;
- (h) Calibrating temperature probe equipment;
- (i) Checking for leaks in kiln pipe-work; and
- (j) Checking shaft seals at wall penetrations (if applicable).

The permittee shall perform all inspections and maintenance actions on the schedule specified and outlined in the Good Work Practices Plan. If any problems are noted during an inspection, the permittee shall perform the necessary unscheduled maintenance to ensure the operation of the kiln as originally designed.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) – PSD BACT Standard)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 52.21(r)(6)(iii)	5.2	PM (filterable) PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Calculate and Maintain Records on Project-Related Emission Increases
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Steam Production	Monitor and Record Steam Production from Each Boiler (Monthly)
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Dried Lumber Throughput	Monitor and Record the Combined Total Throughput from All Kilns (Monthly and Rolling 12-Month Total)
AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Dried Lumber Throughput	Monitor and Record the Total Throughput (Monthly and Rolling 12-Month Total)
		5.6	VOCs	Maintain Records of All Inspections and Maintenance Activities Performed

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

- 5.2 For Emission Point AA-100 (Facility-Wide), the permittee shall monitor the respective emission increase of particulate matter (PM; filterable) particulate matter less than 10 microns (µm) in diameter (PM<sub>10</sub>; filterable + condensable), and particulate matter less than 2.5 µm in diameter (PM<sub>2.5</sub>; filterable + condensable) as a result of the proposed construction project permitted herein.

The permittee shall calculate and record the respective pollutant emissions in tons per year (tpy) on a 12-month calendar year basis from all sources affected by the proposed construction project for a duration of five (5) years following the resumption of regular

operations after the permitted modifications in accordance with 40 CFR 52.21(r)(6)(i)(c); Subpart A.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 52.21(r)(6)(iii))

- 5.3 For Emission Points AA-001 and AA-002, the permittee shall monitor, and record the total quantity (in pounds) of steam generated by each boiler on a monthly basis.

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

- 5.4 For Emission Points AA-006 and AA-007, the permittee shall monitor and record the combined total throughput of dried lumber from all kilns, in board feet (bd-ft), both on a monthly basis and a rolling 12-month total basis.

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

- 5.5 For Emission Point AA-010, the permittee shall monitor the total throughput of dried lumber from the kiln, in board feet (bd-ft), both on a monthly basis and a rolling 12-month total basis.

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

- 5.6 For Emission Point AA-010, the permittee shall maintain records of all inspections and maintenance actions performed in accordance with the Good Work Practices Plan required in Condition 4.1. These records shall be kept on-site for three (3) years and made readily available for review by MDEQ personnel upon request. The records from the remaining two (2) years may be kept off-site and must be available upon request.

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



## SECTION 6. REPORTING REQUIREMENTS

### 6.1 General Reporting Requirements:

- (a) 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. The report shall be made within five (5) working days of the time the deviation began.

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

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> of each calendar year 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.C.

Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or start-up (whichever is applicable).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

- (c) Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating 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. 2.2.B(11).)

- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify MDEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

- (e) The permittee must notify MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the

Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board no later than fifteen (15) days after completing construction / installation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

### Specific Reporting Requirements:

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 52.21(r)(6)(v)	6.2	Submit Calculated Annual Emissions for PM, PM <sub>10</sub> , and PM <sub>2.5</sub>
AA-001 AA-002 AA-006 AA-007 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	Submit Semi-Annual Monitoring Report
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit Notification of Completion of Unit Decommission
AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit Notifications on Initial Start-Up and Completion of Shakedown Period
		6.6	Submit Initial Good Work Practices Plan

6.2 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1<sup>st</sup> (or February 29<sup>th</sup> when applicable) of each year for the preceding 12-month calendar year that contains the following information:

- (a) The name, address, and telephone number of the facility;
- (b) The calculated annual emissions as specified in Condition 5.2; and

- (c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections).

Additionally, the report shall address whether the calculated annual emissions specified in Condition 5.2 meet the criteria of paragraphs (d) and/or (e):

- (d) Exceed the baseline actual emissions documented in the pre-construction Prevention of Significant Deterioration (PSD) major modification applicability test by a “significant” [as defined by 40 CFR 52.21(b)(23)] amount for the pollutants referenced in Condition 5.2; and
- (e) Differ from the established pre-construction projected emissions presented for the proposed construction project permitted herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 52.21(r)(6)(v))

- 6.3 For Emission Points AA-001, AA-002, AA-006, AA-007, and AA-010, the permittee shall submit semi-annual monitoring reports in accordance with Condition 6.1(b) that include the following information:

- (a) The quantity (in pounds) of steam generated by each boiler on a monthly basis;
- (b) The combined total throughput (in board feet) of lumber dried by all batch kilns both on a monthly basis and a rolling 12-month total basis;
- (c) The total throughput (in board feet) of lumber dried by the continuous kiln both on a monthly basis and a rolling 12-month total basis; and
- (d) Any changes that have been made to the Good Work Practices Plan required by Condition 4.1.

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

- 6.4 For Emission Point AA-006, upon completion of the decommissioning of Kiln No. 1, the permittee shall notify the MDEQ, in writing, no later than fifteen (15) days following the decommission completion date.

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

- 6.5 For Emission Point AA-010, the permittee shall submit written notifications to the MDEQ no later than fifteen (15) days after the following has occurred:

- (a) The initial start-up of the kiln; and
- (b) The completion of the shakedown period for kiln.

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

- 6.6 For Emission Point AA-010, the permittee shall submit to the MDEQ for review the initial Good Work Practices Plan required by Condition 4.1 no later than thirty (60) days after certifying completion of construction.

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