# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

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

Weyerhaeuser NR Company, McComb Wood Products 2056 Jesse Hall Industrial Parkway Magnolia, Mississippi Pike County

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: December 28, 2000

Permit No.: 2280-00050

Modified: September 23, 2002, March 12, 2004, December 22, 2008, and NOV 1 6 2015

#### Part I

# A. GENERAL CONDITIONS

- 1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
- 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).)
- 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).)
- 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).)
- 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).)
- 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).)
- 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).)
- 9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

#### Page 3 of 20 Permit No.: 2280-00050

- 10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an 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.)
- 11. Solids Removal: 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. (Ref.: Miss. Code Ann. 49-17-29)
- 12. Diversion and Bypass of Air Pollution Controls: 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 11 Miss. Admin. Code Pt. 2, R. 1.1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 13. 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).)
- 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 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. (Ref.: Miss. Code Ann. 49-17-21)
- 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:
  - 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.)

- 16. Public Record and Confidential Information: 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. (Ref.: Miss. Code Ann. 49-17-39)
- 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.)
- 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).)
- 19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(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).)
- 21. Beginning Operation: Except as prohibited in Part I, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 22. Application for a Permit to Operate: Except as otherwise specified in Part I, Condition 24 of this permit, 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).)
- 23. Operating Under a Permit to Construct: Except as otherwise specified in Part I, Condition 24 of this permit, 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).)

# Page 5 of 20 Permit No.: 2280-00050

- 24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to "net" out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
- 25. 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), & (6).)

# **B.** GENERAL NOTIFICATION REQUIREMENTS

- 1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- 2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- 3. Upon the completion of construction or installation of an approved stationary source or modification, 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)
- 4. 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

# Page 6 of 20 Permit No.: 2280-00050

to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

#### Page 7 of 20 Permit No.: 2280-00050

# Part II.

# EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning NOVEMBER 16, 2015, the permittee is authorized to modify air emissions equipment for the emission of air contaminants from Emission Point AA-008, the planer mill equipped with a cyclone (Reference No. S6).

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

# **EMISSION LIMITATIONS**

Particulate Matter	0.030 lbs/MBF and 4.53 tons/year, as determined by EPA Approved Oregon Method 8.
$PM_{10}$	0.030 lbs/MBF and 4.53 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect November 16, 2015.

# **OPERATIONAL LIMITATIONS**

For Emission Points AA-008, the permittee shall be limited to a maximum annual lumber throughput of 302,000 MBF/year based on a 365-day rolling total.

#### MONITORING REQUIREMENTS

For Emission Point AA-008, the permittee shall demonstrate compliance with the above listed emissions limitations by stack testing in accordance with EPA Approved Oregon Method 8, and EPA Test Method 9, 40 CFR 60, Appendix A, and submittal of a stack test report within 180 days after December 28, 2000.

A pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the Office of Pollution Control must be notified prior to the scheduled test date.

Continued

#### Page 8 of 20 Permit No.: 2280-00050

# PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

# **EMISSION POINT AA-008 (Continued)**

At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s).

#### RECORDKEEPING AND REPORTING REQUIREMENTS

For Emission Point AA-008, the permittee shall record the lumber throughput rate expressed as MBF/year based on both a daily basis and a consecutive 365-day rolling total.

All records shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control. All records shall be maintained on site for a period of five (5) years following the date of such record.

The permittee shall submit to the Office of Pollution Control a semi-annual report summarizing the lumber throughput rate expressed as MBF/year on a daily basis and a consecutive 365-day rolling total. The report shall be submitted by July 31 and January 31 for the preceding sixmonth period.

# **BEST AVAILABLE CONTROL TECHNOLOGY REQUIREMENTS**

BACT for Emission Point AA-008 are the  $PM/PM_{10}$  Emissions Limitations listed above and use of a pneumatic dust transport system to minimize dust emissions.

BACT for Emission Point AA-008 for VOC emissions was determined to be no add-on controls.

See Part III of this document for any additional requirements

#### Permit No.: 2280-00050 <u>PART II</u> <u>EMISSION LIMITATIONS AND MONITORING REQUIREMENTS</u>

Page 9 of 20

Beginning NOVEMBER 16, 2015, the permittee is authorized to modify air emissions equipment for the emission of air contaminants from Emission Point AA-010, the Wood Fuel Silo equipped with a cyclone (Reference No. S8).

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

# **EMISSION LIMITATIONS**

Particulate Matter	0.024 lbs/MBF and 3.62 tons/year, as determined by EPA Approved Oregon Method 8.
$PM_{10}$	0.024 lbs/MBF and 3.62 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect November 16, 2015.

# **MONITORING REQUIREMENTS**

For Emission Point AA-010, the permittee shall demonstrate compliance with the above listed emissions limitations by stack testing in accordance with EPA Approved Oregon Method 8, and EPA Test Method 9, 40 CFR 60, Appendix A, and submittal of a stack test report within 180 DAYS AFTER December 28, 2000.

A pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the Office of Pollution Control must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s).

# BEST AVAILABLE CONTROL TECHNOLOGY REQUIREMENTS

BACT for Emission Point AA-010 are the PM/  $PM_{10}$  Emission Limitations listed above and use of a pneumatic dust transport system to minimize dust emissions.

BACT for Emission Point AA-010 for VOC emissions was determined to be no add-on controls. See Part III of this document for any additional requirements

#### Page 10 of 20 Permit No.: 2280-00050

# PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning <u>December 28, 2000</u>, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from the following Emission Points:

Emission Point*	Name	Reference No.
AA-002	Lumber Dry Kiln No. 1	<b>S</b> 1
AA-003	Lumber Dry Kiln No. 2	S2
AA-004	Lumber Dry Kiln No. 3	<b>S</b> 3
AA-005	Lumber Dry Kiln No. 4	<b>S</b> 4
AA-006	Lumber Dry Kiln No. 5	S5

# **EMISSION POINTS**

\*Each Emission Point is Equipped with a Direct-Fired Suspension Wood Burner and a LPG igniter.

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

# **EMISSION LIMITATIONS\*\***

Particulate Matter	0.61 lbs/MBF and 92.1 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
PM <sub>10</sub>	0.61 lbs/MBF and 92.1 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Nitrogen Oxides	0.62 lbs/MBF and 93.6 tons/year, as determined by EPA Test Method 7, 40 CFR 60, Appendix A.
Carbon Monoxide	2.80 lbs/MBF and 422.8 tons/year, as determined by EPA Test Method 10, 40 CFR 60, Appendix A.
Volatile Organic Compounds	5.35 lbs (as WPP1 VOC)/MBF and 807.9 tons/year, as determined by EPA Test Method 25A and OTM 26, 40 CFR 60, Appendix A.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

#### Page 11 of 20 Permit No.: 2280-00050

### PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

# **EMISSION LIMITATIONS (Continued)**

\*\* The above listed Annual Emission Limitations are the combined total limits for all seven (7) kilns.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect <u>December 28, 2000</u>.

# **OPERATIONAL LIMITATIONS**

For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, and AA-011 the kilns shall be limited to a combined maximum annual lumber throughput of 302,000 MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule.

# **RECORDKEEPING AND REPORTING REQUIREMENTS**

For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-011, the permittee shall record the weekly lumber throughput rate for all seven kilns combined, and the total combined throughput expressed as MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule.

All records shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control. All records shall be maintained on site for a period of five (5) years following the date of such record.

The permittee shall submit to the Office of Pollution Control a semi-annual report summarizing the total combined throughput for all seven kilns expressed as MBF/Year based on a consecutive 52-week rolling total. The report shall be submitted by July 31 and January 31 for the preceding six-month period.

# **BEST AVAILABLE CONTROL TECHNOLOGY REQUIREMENTS**

BACT for Emission Points AA-002, AA-003, AA-004, AA-005, and AA-006 are the Emission Limitations listed above. No add-on controls will be required for these emission points.

See Part III of this document for any additional requirements.

#### Page 12 of 20 Permit No.: 2280-00050

# PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Beginning <u>December 28, 2000</u>, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-007, Lumber Dry Kiln No. 6 equipped with a Direct-Fired Suspension Wood Burner (Reference No. S10).

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

# **EMISSION LIMITATIONS\*\***

Particulate Matter	0.61 lbs/MBF and 92.1 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
$PM_{10}$	0.61 lbs/MBF and 92.1 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.
Nitrogen Oxides	0.62 lbs/MBF and 93.6 tons/year, as determined by EPA Test Method 7, 40 CFR 60, Appendix A.
Carbon Monoxide	2.80 lbs/MBF and 422.8 tons/year, as determined by EPA Test Method 10, 40 CFR 60, Appendix A.
Volatile Organic Compounds	5.35 lbs (as WPP1 VOC)/MBF and 807.9 tons/year, as determined by EPA Test Method 25A and OTM 26, 40 CFR 60, Appendix A.
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.

\*\* The above listed Annual Emission Limitations are the combined total limits for all seven (7) kilns.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect <u>December 28, 2000</u>.

# **OPERATIONAL LIMITATIONS**

For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-011, the kilns shall be limited to a combined maximum annual lumber throughput of 302,000 MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule.

Continued

#### Page 13 of 20 Permit No.: 2280-00050

#### PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

### **EMISSION POINT AA-007 (Continued)**

#### **RECORDKEEPING AND REPORTING REQUIREMENTS**

For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-011, the permittee shall record the weekly lumber throughput rate for all seven kilns combined, and the total combined throughput expressed as MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule.

All records shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control. All records shall be maintained on site for a period of five (5) years following the date of such record.

The permittee shall submit to the Office of Pollution Control a semi-annual report summarizing the total combined throughput for all seven kilns expressed as MBF/Year based on a consecutive 52-week rolling total. The report shall be submitted by July 31 and January 31 for the preceding six-month period.

# **BEST AVAILABLE CONTROL TECHNOLOGY REQUIREMENTS**

BACT for Emission Point AA-007 is the Emissions Limitations listed above. No add-on controls will be required for this emission point.

The limits for emissions of all air contaminants other that  $PM/PM_{10}$  from this emissions point were established in a previously issued PSD Construction permit. The  $PM/PM_{10}$  emissions limitations contained in this permit are more stringent.

See Part III of this document for any additional requirements

# Permit No.: 2280-00050 <u>PART II</u> <u>EMISSION LIMITATIONS AND MONITORING REQUIREMENTS</u>

Page 14 of 20

Beginning <u>September 23, 2002</u>, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-011, Lumber Dry Kiln No.7 equipped with a Direct-Fired Suspension Wood Burner.

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

# **EMISSION LIMITATIONS\*\***

Particulate Matter	0.61 lbs/MBF and 92.1 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.	
$PM_{10}$	0.61 lbs/MBF and 92.1 tons/year as determined by EPA Test Method 201 or 201A in conjunction with Test Method 202, 40 CFR 51, Appendix M.	
Nitrogen Oxides	0.62 lbs/MBF and 93.6 tons/year, as determined by EPA Test Method 7, 40 CFR 60, Appendix A.	
Carbon Monoxide	2.80 lbs/MBF and 422.8 tons/year, as determined by EPA Test Method 10, 40 CFR 60, Appendix A.	
Volatile Organic Compounds	5.35 lbs (as WPP1 VOC)/MBF and 807.9 tons/year, as determined by EPA Test Method 25A and OTM 26, 40 CFR 60, Appendix A.	
Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A.	
** The above listed Annual Emission Limitations are the combined total limits for all seven (7)		

kilns.

All test methods specified above shall be those versions, or their approved equivalents, which are in effect September 23, 2002.

# **OPERATIONAL LIMITATIONS**

For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-011, the kilns shall be limited to a combined maximum annual lumber throughput of 302,000 MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule.

Continued

#### Page 15 of 20 Permit No.: 2280-00050

#### PART II EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

### **EMISSION POINT AA-011 (Continued)**

### **RECORDKEEPING AND REPORTING REQUIREMENTS**

- 1. The permittee shall submit to the Office of Pollution Control certification of completion of construction of Emission Point AA-011 within 10 working days of the completion date.
- 2. The permittee shall submit to the Office of Pollution Control notification of startup of Emission Point AA-011 of within 10 working days of commencement of operation.
- 3. For Emission Point AA-011, the permittee shall demonstrate compliance with PM, NO<sub>X</sub>, CO, and VOC (as carbon) emission limitations by stack testing the Lumber Kiln in accordance with EPA Reference Methods 1-5, 7E, 10, and 25A, 40 CFR 60, Appendix A. Testing must be performed within 180 days of notification of startup. A stack test report must be submitted within thirty (30) days of completion of the testing. (Ref.: 11 Miss. Admin Code Pt. 2 R. 6.3.A.3(a))
- 4. 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 Office of Pollution Control. If deemed necessary, a pretest conference prior to the scheduled test date may be required to discuss the test methods and procedures outlined in the test protocol. Also, the permittee shall notify the Office of Pollution Control 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
- 5. For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-011, the permittee shall record the weekly lumber throughput rate for all seven kilns combined, and the total combined throughput expressed as MBF/Year based on a consecutive 52-week rolling total. Each one-week period shall be on a Monday to Monday time frame to coincide with the facility's operating schedule. All records shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control. All records shall be maintained on site for a period of five (5) years following the date of such record.
- 6. The permittee shall submit to the Office of Pollution Control a semi-annual report summarizing the total combined throughput for all seven kilns expressed as MBF/Year based on a consecutive 52-week rolling total. The report shall be submitted by July 31 and January 31 for the preceding six-month period.

# **BEST AVAILABLE CONTROL TECHNOLOGY REQUIREMENTS**

BACT for Emission Point AA-011 is the Emissions Limitations listed above. No add-on controls will be required for this emission point.

See Part III of this document for any additional requirements

### PART III OTHER REQUIREMENTS

- (1) For the entire facility, the averaging period for all pollutants with lb/MBF and lb/MMBTU limitations shall be a 24-hour average.
- (2) The permittee shall establish the ambient concentration of particulate matter (PM<sub>10</sub>) near the facility by performing ambient air quality monitoring in accordance with 40 CFR Parts 50 and 58.
- (3) The permittee shall operate at least two ambient  $PM_{10}$  monitors sited in accordance with 40 CFR Part 58. Monitor locations must be approved by the Office of Pollution Control.
- (4) The  $PM_{10}$  monitors must be equipped with a meteorological device to monitor wind speed and direction. The wind speed and measurement data obtained during the first year of monitoring may be used to assess whether or not one or both of the  $PM_{10}$  monitors should be relocated.
- (5) The permittee shall submit an ambient air quality monitoring plan within sixty (60) days of <u>December 28, 2000</u>. The monitoring plan must be approved by the Office of Pollution Control prior to commencement of monitoring.
- (6) The permittee shall commence the ambient air quality monitoring within 180 days of <u>December 28, 2000</u>.
- (7) The permittee shall submit certification of ambient air quality monitor installation within 10 working days of project completion and notify the Office of Pollution Control at least 10 working days prior to commencing operation of the ambient air quality monitors.
- (8) The ambient air quality monitoring should be performed for a period necessary to gather sufficient data but no less than two full calendar years.
- (9) The permittee shall maintain all the records from the ambient air quality and meteorological monitoring outlined above 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. All instances of deviations from permit requirements must be clearly identified in such reports.
- (10) The permittee shall submit a report summarizing the records from the ambient air quality and meteorological monitoring data for each calendar quarter. The report shall be post-marked no later than thirty (30) days following the end of the calendar quarter.

- (11) All records shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control. All records shall be maintained on site for a period of five (5) years following the date of such record.
- (12) If the ambient air quality monitoring indicates an exceedance of the National Ambient Air Quality Standards (NAAQS), the Office of Pollution Control will reopen this permit. The evaluation upon reopening may include further permit limitations and/or installation of more stringent pollution controls at the facility.
- (13) If the permittee can demonstrate that the air quality standards have not been exceeded after two full calendar years, the permittee may upon written approval from the Office of Pollution Control, suspend the ambient monitoring.
- (14) 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. 1.10.A)
    - (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:
      - (a) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (b) the source was at the time being properly operated;
      - (c) 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;
      - (d) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
      - (e) 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. 1.10.B & C)
  - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (a) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (b) 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
    - (c) 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:
    - (a) the permittee can identify the need for the maintenance;
    - (b) the source was at the time being properly operated;
    - (c) 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;

- (d) 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
- (e) 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)