

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT**

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

Georgia Pacific Wood Products LLC, Bay Springs Facility
71 Georgia Pacific Road
Bay Springs, Jasper, 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: AUG 16 2018

Permit No.: 1300-00019

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).)

- 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).)

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

Part II.
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Upon permit issuance, the permittee is authorized to construct/modify air emissions equipment and emit air contaminants from:

Emission Point AB-002, No.1 Batch Dry Kiln with associated 35 MMBTU/hr sawdust burner and 35 MMBTU/hr natural gas burner.

Emission Point AB-004, the No. 3 Continuous Dry Kiln with associated 35 MMBTU/hr sawdust burner and 35 MMBTU/hr natural gas burner.

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

EMISSIONS LIMITATIONS

Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin Code Pt. 2, R.1.3A)
SO ₂	500 ppm (volume) from any process equipment. (Ref.: 11 Miss. Admin. Code Pt. 2 R.1.4.B(1))

BACT LIMITATIONS

VOC	5.49 lb per thousand board-feet not to exceed 468.3 tons/yr, as determined by monitoring of throughput and recordkeeping.
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All test methods specified above shall be those versions, or their approved equivalents, which are in effect upon issuance of this permit.

OPERATIONAL LIMITATIONS

For Emission Points AB-002 and AB-004, the permittee shall be limited to a maximum annual lumber throughput of 170,600 thousand board-feet per year, measured on a monthly basis and tracked on a 12-month rolling total.

OPERATIONAL REQUIREMENTS

The permittee is required to operate No.1 Batch Dry Kiln and No.3 Continuous Dry Kiln (AB-002 and AB-004) using Good Work Practices, which include periodic maintenance on the kilns, any associated equipment involved in the kiln drying of lumber, and the associated process control equipment. Records, which demonstrate that Good Work Practices have been utilized in the operation of the kilns, shall be kept on-site for three years.

For Emission Points AB-002 and AB-004, the permittee shall perform quarterly inspections on the kilns to ensure they are performing as designed. If any problems are noted, the permittee shall perform the necessary maintenance to ensure they are operating as designed. Results of all inspections and any accompanying maintenance shall be kept on-site for three years for inspection by MDEQ personnel.

For Emission Points AB-002 and AB-004, the permittee is authorized to burn as fuel only natural gas and uncontaminated woodwaste. For purposes of this permit, woodwaste is defined as sawdust, bark, green chips, and planer shavings generated from the processing of harvested timber and may be purchased from outside sources. Additionally, the permittee is authorized to use up to 10 gallons of liquid fuel to ignite the fuel bed during startup. Records of the fuel used shall be kept on-site.

RECORDKEEPING AND REPORTING REQUIREMENTS

For Emission Points AB-002 and AB-004, the permittee shall record the lumber throughput rate, measured on a monthly basis and tracked on a 12-month rolling total expressed in MBF/year.

The records and the calculations shall be maintained on-site for five years for inspection by MDEQ personnel. The permittee shall also submit a semi-annual summary of these results postmarked no later than January 31st and July 31st for the preceding six-month period.

Part II (Continued)
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Upon permit issuance, the permittee is authorized to construct/modify air emissions equipment and emit air contaminants from:

Emission Point AB-005 Planer Mill equipped with cyclone

Such emissions shall be limited by the permittee as specified below:

EMISSIONS LIMITATIONS

Opacity	40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin Code Pt. 2, R.1.3A)
PM/PM₁₀	4.3 lb/hr and 16.1 tons/year as determined by EPA Reference Methods 1-5, 201 or 201A respectively

OPERATIONAL REQUIREMENTS

For Emission Point AB-005, the permittee shall monitor particulate matter (PM) emissions, PM₁₀, and opacity by stack testing in accordance with EPA Reference Methods 1-5, 201 or 201A and 9, respectively, once during the life of the TV permit but no later than 1 year prior to the expiration of the Title V permit. The PM, PM₁₀ and opacity testing shall be performed simultaneously. Should the emission point be shutdown or not operated at the time specified within this condition for the stack test, then the emission point should comply with this condition by stack testing within 90 days of start-up of the emission point.

The permittee shall supply DEQ with a written notification upon start-up of the emission point. The permittee shall submit said test report within 30 days of performance of the test. For the purpose of compliance demonstration, the permittee shall operate Emission Point AB-005 at capacity. Should the permittee operate the emission point at something less than capacity, then DEQ may modify the permit to limit capacity of the emission point to the rate at which the compliance test was demonstrated (11 Miss. Admin. Code Pt. 2, R. 2.4.B).

If the permittee plans to use a test method, procedure, or operating condition that differs from the requirements of this permit herein, then 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 DEQ. Also, the DEQ 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). (Ref.: Title V Operating Permit issued August 1, 2011 and modified July 9, 2015)

For Emission Point AB-005, the permittee shall not operate the Planer Mill over 7500 hr/yr. The permittee shall maintain records of the hours of operation. These records shall be kept in a log form and shall be made available upon request by DEQ personnel.

The permittee shall submit a semi-annual summary of the hours of operation of the Planer Mill postmarked no later than January 31st and July 31st for the preceding six-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

For Emission Point AB-005, the permittee shall monitor daily operations such that all downtime of the cyclone associated with this emission point is documented and maintained in a log form. In the event of failure of the cyclone, the permittee shall cease operations until such time that repairs are made and the maximum control efficiency of the cyclone is restored. Records of any and all maintenance and/or inspections must be kept at the facility and made available for review during any visit by DEQ personnel. A summary of these records shall be submitted to the DEQ in a semi-annual report postmarked no later than January 31st and July 31st for the preceding six-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

Part II (Continued)
EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

Upon permit issuance, the permittee is authorized to construct/modify air emissions equipment and emit air contaminants from:

Emission Point AB-009 Shavings truck loading bin with cyclone

Emission Point AB-010 Sawdust silo with cyclone

Such emissions shall be limited by the permittee as specified below:

EMISSIONS LIMITATIONS

Opacity 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin Code Pt. 2, R.1.3A)

PM $E = 4.1(p^{0.67})$, where E is the emission rate in pounds per hour, p is the process weight input rate in tons per hour and E is determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 1. R. 1.3(F))

OPERATIONAL REQUIREMENTS

For Emission Points AB-005, AB-009 and AB-010, the permittee shall perform monthly inspections on the cyclones to ensure they are performing as designed. If any problems are noted, the permittee shall perform the necessary maintenance to ensure they are operating as designed. The permittee shall also maintain sufficient equipment as is necessary to repair the pollution control equipment. Results of all inspections and any accompanying maintenance shall be kept on-site for three years for inspection by MDEQ personnel.

For Emission Points AB-005, AB-009 and AB-010, the permittee shall cease all operations of the process line associated with this cyclone in the event the cyclone is proven inoperative for whatever the reason. (Ref.: Title V Operating Permit issued August 1, 2011 and modified July 9, 2015)

**Part III.
OTHER REQUIREMENTS**

- 1. Emission Points AB-002 and AB-004 are subject to the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD. These units are affected sources per 40 CFR 63.2231(a) of the rule; however, the only applicable requirement was the initial notification. There are no other applicable monitoring, recordkeeping or reporting requirements for these emission points in Subpart DDDD. (Ref: 40 CFR 63.2231)**
- 2. For Emission Points AB-002, AB-004, AB-005, AB-009 and AB-010, the permittee shall assure compliance with the opacity limitations by weekly observations of emissions from exhaust stacks. If any visible emissions are detected during an observation period of six (6) consecutive minutes, a visible emission evaluation (VEE) shall be performed using EPA Reference Method 9. If a VEE is performed using EPA Reference method 9, then the observation period shall consist of a minimum of 18 consecutive minutes; however if the visible emissions after a period of 6 minutes are determined to be less than 10% opacity, then the permittee can elect to discontinue doing the VEE.**

Further, the permittee shall maintain a log documenting all visual observations/test, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize the emissions, and the date and time when visible emission observations were conducted. Results for each of the observations and any accompanying test shall be recorded and kept on-site for inspection by MDEQ personnel for three years.

The permittee shall also submit a semi-annual summary of these test postmarked no later than January 31st and July 31st 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.

- 3. The permittee shall maintain (on a daily basis) the process weight input of the logs entering the sawmill expressed in units of tons/hour daily. Records of this information shall be kept in log form and shall be made available upon request by DEQ personnel.**

The permittee shall submit a semi-annual summary of the log records postmarked no later than January 31st and July 31st for the preceding six-month period. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

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

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

- (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.1.2.EE and 1.2.Z)**