

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

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

Biewer Sawmill Newton, LLC
331 Coliseum Drive
Newton, Newton County, MS

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: March 28, 2016

Permit No.: 1980-00044

Modified: NOV 07 2018

SECTION 1

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 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 Section 1, 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).)

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	Direct-Fired Lumber Drying Kiln equipped with a 38.76 MMBTU / hour Natural Gas-Fired Gasifier Burner
AA-002	Direct-Fired Lumber Drying Kiln equipped with a 38.76 MMBTU / hour Natural Gas-Fired Gasifier Burner
AA-003	Direct-Fired Lumber Drying Kiln equipped with a 38.76 MMBTU / hour Natural Gas-Fired Gasifier Burner
AA-004	Two (2) Log Process Debarkers
AA-005	Two (2) Bark Hogs
AA-007	Sawmill Area [includes two (2) separate saw lines]
AA-008	Two (2) Sawmill Chippers / Screens
AA-009	Planer Mill Area [includes the Planer Mill Block Hog – emissions are routed to a cyclofilter (a combination cyclone / baghouse control unit)]
AA-010	Haul Roads
AA-011	Wood Residual Storage Area [includes a Bark Pile, a Wood Chip Storage Bin, a Sawdust Storage Bin, and a Wood Shavings Storage Bin]
AA-012	Above-Ground Storage Tanks [includes one 1,000-Gallon Gasoline Tank, one 10,000-Gallon Diesel Tank, one 1,000-Gallon Used Oil Tank, one 2,000-Gallon Hydraulic Oil Tank]
AA-014	60 HP (0.84 MMBTU / hour) Natural Gas-Fired Emergency Generator Engine [4-Stroke / Lean Burn]

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Limitation / Standard
AA-001 through AA-005 AA-007 through AA-012 AA-014	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	40%
AA-001 through AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.2	PM (filterable only)	$E = 0.8808 (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, R. 1.4.B.(1).	3.3	SO ₂	500 ppm _v
	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein) 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.4	VOCs	4.74 pounds per MBF (for Each Kiln) 830.02 tpy (for Combined Kilns)
		3.5	Dried Lumber Throughput	350 MMBF per Year (for Combined Kilns)
		3.6	Final Moisture Content	10% or Greater
		3.7	Maximum Operating Temperature	275 °F
AA-004 AA-005 AA-007 AA-008 AA-011	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.8	PM (filterable only)	$E = 4.1 (p^{0.67})$
AA-004	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein)	3.9	PM	Operational Requirement (PSD Avoidance Limit)
AA-007		3.10		
AA-009		11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.11	PM / PM ₁₀

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant / Parameter	Limitation / Standard
AA-009	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein)	3.12	PM / PM ₁₀	20.93 tons per hour 70,000 tpy (PSD Avoidance Limit)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.13	Differential Pressure Range	$0.2 \leq P \leq 6.0$ (inches H ₂ O)
AA-012	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein)	3.14	Surface Coating Requirement	“Light” or White” Coloring
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).			
AA-014	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	3.15	HAPs	Applicability
	40 CFR 60.4230(a)(4)(iii) and (iv); Subpart JJJJ			
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.1(a).	3.16	PM (filterable only)	0.6 pounds per MMBTU / hour heat input
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.17	SO ₂	4.8 pounds per MMBTU heat input
	40 CFR 60.4237(c); Subpart JJJJ	3.18	Monitoring Requirement	Install a Non-Resettable Hour Meter
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).			
	40 CFR 60.4233(e) and 60.4234; Subpart JJJJ – Table 1	3.19	NO _x + HC	10 grams per HP-hour
			CO	387 grams per HP-hour
40 CFR 60.4243(e); Subpart JJJJ	3.20	Fuel Alternative	Propane for 100 Hours per Calendar Year	
40 CFR 60.4243(d)(1–3); Subpart JJJJ	3.21	Non-Emergency Operation	100 Hours per Calendar Year	

3.1 For Emission Points AA-001 through AA-005, AA-007 through AA-012, and AA-014, the permittee shall not discharge into the ambient air from any point source or emissions, any

contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.2 For Emission Points AA-001 through AA-003, the emission of ash and/or particulate matter (PM) from the kiln burners shall not exceed an emission rate as determined by the following relationship:

$$E = 0.8808 (I^{-0.1667})$$

Where "E" is the emission rate in pounds per MMBTU per hour heat input and "I" is the heat input in MMBTU per hour.

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

- 3.3 For Emission Points AA-001 through AA-003, the permittee shall not allow the emission of gas containing sulfur oxides (measured as sulfur dioxide or SO₂) from the lumber drying kilns in excess of 500 parts per million by volume (ppmv).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.B.(1).)

- 3.4 For Emission Points AA-001 through AA-003, the permittee shall limit Volatile Organic Compound (VOC) emissions from each lumber drying kiln to no more than 4.74 pounds per thousand board feet (MBF) produced as WPP1 VOC – Wood Products Protocol 1 VOC. Additionally, VOC emissions from the combined lumber drying kilns shall not exceed 830.02 tons per year (tpy) based on a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.5 For Emission Points AA-001 through AA-003, the permittee shall limit the throughput of dried lumber produced from the combined lumber drying kilns to no more than 350.0 million board feet (MMBF) or 350,000.0 thousand board feet (MBF) per year based on a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.6 For Emission Points AA-001 through AA-003, the permittee shall limit the final moisture content of dried lumber produced within each lumber drying kiln to 10% or greater.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.7 For Emission Points AA-001 through AA-003, the permittee shall limit the maximum operating temperature of each lumber drying kiln to no more than 275°F.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.8 For Emission Points AA-004, AA-005, AA-007, AA-008, and AA-011, except as otherwise specified, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

- 3.9 For Emission Point AA-004, the permittee shall ensure the structural integrity of the building that contains the referenced emissions source equipment is sustained as a “total enclosure” for the complete reduction of particulate matter- (i.e. PM, PM₁₀, and PM_{2.5}) emissions.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).; PSD Avoidance Limit)

- 3.10 For Emission Point AA-007, the permittee shall ensure that the structural integrity of the building and the enclosures that contain the referenced emission source equipment is sustained as “full enclosures” for the purpose of achieving the maximum reduction of particulate matter (i.e. PM, PM₁₀, and PM_{2.5}) emissions.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).; PSD Avoidance Limit)

- 3.11 For Emission Point AA-009, the permittee shall not operate the planer mill area without simultaneously operating the cyclofilter. If the cyclofilter malfunctions or stops operating, the permittee shall cease operations at the planer mill area until the cyclofilter is returned to service.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.12 For Emission Point AA-009, the permittee shall limit the dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area to no more than 20.93 tons per hour. Additionally, the dried lumber shavings / trim from the planer mill area shall not exceed 70,000 tons per year (tpy) in a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).; PSD Avoidance Limit)

- 3.13 For Emission Point AA-009, the permittee shall operate the cyclofilter within the following differential pressure drop (“*P*”) range as measured in inches of water (in. H₂O): 0.2 in. H₂O ≤ *P* ≤ 6.0 in. H₂O.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.14 For Emission Point AA-012, the permittee shall only apply an applicable surface coating to the referenced storage tanks with a coloring either described as “light” or “white”.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.15 Emission Point AA-014 is subject to and shall comply with applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

By complying with the applicable requirements of Subpart JJJJ, the permittee is demonstrating compliance with applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

(Ref: 40 CFR 60.4230(a)(4)(iii) and (iv); Subpart JJJJ)

- 3.16 For Emission Point AA-014, the maximum permissible emission of ash and/or Particulate Matter (PM) shall not exceed 0.6 pounds per million BTU (MMBTU) per hour heat input.

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

- 3.17 For Emission Point AA-014, the maximum discharge of sulfur oxides from the fuel burning installation shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.18 For Emission Point AA-014, the permittee shall install a non-resettable hour meter on the engine regardless of whether the permittee is required to do so by a Federal regulation.

(Ref.: 40 CFR 60.4237(c); Subpart JJJJ)

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

3.19 For Emission Point AA-014, the permittee shall comply and not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

(a) Nitrogen Oxides + Hydrocarbons (NO_x +HC): 10 grams per horsepower-hour;

(b) Carbon Monoxide (CO): 387 grams per horsepower-hour.

The permittee shall operate and maintain the affected source in such a manner to achieve the referenced emission standards over the entire life of the affected source.

(Ref.: 40 CFR 60.4233(e) and 40 CFR 60.4234; Subpart JJJJ)

3.20 For Emission Points AA-014, during emergency operations only, the permittee may operate the engine using propane as an alternative fuel for a maximum of 100 hours per calendar year.

(Ref.: 40 CFR 60.4243(e); Subpart JJJJ)

3.21 For Emission Point AA-014, any operation of the engine for other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If an affected source is not operated in accordance within the outlined provisions, the affected source will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine:

(a) There is no time limit on the use of an affected source in emergency situations.

(b) The permittee may operate the engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the affected source. Maintenance checks and readiness testing of an affected source is limited to a maximum of 100 hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the affected source beyond 100 hours per calendar year.

- (c) The permittee may operate the engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4243(d)(1-3); Subpart JJJ)

SECTION 4
WORK PRACTICE STANDARDS

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE
STANDARDS APPLY TO THIS PERMIT ACTION

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code, Pt. 2, R. 6.3.A.(3)(b)(2).	5.1	Recordkeeping	Maintain Records for a Minimum of 5 Years
AA-001 through AA-003	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein) 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.2	Lumber Throughput	Record Monthly Throughput of Dried Lumber (from Combined Kilns)
		5.3	Final Moisture Content	Monitor Dried Lumber Processed through the Planer Mill Area Maintain Monthly Moisture Content Trending Data
		5.4	Maximum Operating Temperature	Maintain Monthly Operating Temperature Trending Data
		5.5	VOCs HAPs	Develop and Implement a Maintenance & Inspection Plan
AA-004 AA-007	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein)	5.6	Opacity	Certify Structural Integrity of Building(s) / Enclosure(s) Semi-Annually
AA-005 AA-008 AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.7		Conduct Monthly Visible Emission Evaluations
AA-009	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein) 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.8	Opacity	Conduct Monthly Visible Emission Evaluations
		5.9	PM / PM ₁₀	Monitor Total Throughput of Dried Lumber Shavings / Trim to Cyclofilter Calculate Average Hourly Throughput of Dried Lumber Shavings / Trim to Cyclofilter
		5.10		Monitor Differential Pressure Drop Daily
		5.11		Conduct a Weekly Inspection of the Cyclofilter
Emission Point	Applicable Requirement	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement

AA-012	Federally Enforceable PSD Construction Permit (Issued on March 28, 2016; Modified as Specified Herein) 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.12	VOCs	Maintain Compliant Surface Coating Color
AA-014	40 CFR 60.4245(b); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.13	HAPs	Record Hours of Operation (Emergency and Non-Emergency)
	40 CFR 60.4243(b)(1); Subpart JJJJ	5.14		Maintain Maintenance Records
	40 CFR 60.4243(e); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.15		Record Hours of Operation using Propane as Fuel Source

5.1 Except as otherwise specified or limited herein, 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. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from 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” or this permit upon request.

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

5.2 For Emission Points AA-001 through AA-003, the permittee shall record and maintain the total throughput of dried lumber produced from the combined lumber drying kilns monthly in thousand board feet (MBF) per year based on a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.3 For Emission Points AA-001 through AA-003, the permittee shall demonstrate compliance with the final moisture content limit referenced in Condition 3.6 by monitoring the moisture content of all dried lumber processed through the planer mill area. Additionally, the permittee shall record and maintain trend data that showcases the moisture content of dried lumber based on a monthly average.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.4 For Emission Points AA-001 through AA-003, the permittee shall demonstrate compliance with the maximum operating temperature limit referenced in Condition 3.7 by recording and maintaining monthly operating temperature trend data for each lumber drying kiln.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.5 For Emission Points AA-001 through AA-003, within ninety (90) days upon issuance of this permit, the permittee shall develop an initial maintenance / inspection plan that establishes work practice standards in accordance with the manufacturer's specifications for direct-fired kiln operations. Additionally, the plan shall outline a schedule for all actions necessary to inspect and maintain, at a minimum, the following equipment on each lumber drying kiln:

- (a) Circulation, exhaust, and combustion air fans;
- (b) Floor decking;
- (c) Dampers;
- (d) Baffles; and
- (e) Burners.

All inspections and maintenance actions shall be conducted on the specified schedule as required by the plan. Additionally, the plan shall be maintained on-site and made readily available for review by MDEQ personnel.

If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance to ensure operation of a lumber drying kiln as originally designed.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.6 For Emission Points AA-004 and AA-007, the permittee shall demonstrate compliance with Conditions 3.9 and 3.10 by certifying (in writing) that the structural integrity of the applicable building(s) / enclosure(s) has been maintained for the referenced particulate matter emissions reductions once every six months within a calendar year.

Additionally, the permittee shall maintain all documentation that details any maintenance action(s) performed on the building(s) / enclosure(s) necessary to maintain the applicable emissions reductions.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.7 For Emission Points AA-005, AA-008, and AA-011, the permittee shall perform a monthly Visible Emission Evaluation (VEE) using EPA Test Method 9 (i.e. "Method 9") on the emission sources or the ambient air around the emission sources while in operation. In addition to the provisions outlined in Method 9, the permittee shall also adhere to the following guidelines:

- (a) All evaluations shall be conducted during daylight hours and during conditions representative of normal operation for the respective sources;
- (b) In the event that a VEE is not conducted during any calendar month, the permittee shall denote and maintain an explanation as to why the VEE was not performed;
- (c) If the result of a VEE indicates non-compliance with the opacity limit referenced in Condition 3.1, the permittee shall immediately determine the cause(s) for the exceedance and perform the necessary corrective action(s) to minimize emissions; and
- (d) The permittee shall maintain applicable documents pertaining to all VEEs and any corrective action(s) taken to prevent or minimize emissions as a result of any VEE.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.8 For Emission Point AA-009, the permittee shall perform a monthly Visible Emission Evaluation (VEE) using EPA Test Method 9 (i.e. "Method 9") on the exhaust discharged from the cyclofilter. In addition to the provisions outlined in Method 9, the permittee shall also adhere to the following guidelines:

- (a) All evaluations shall be conducted during daylight hours and during conditions representative of normal operation for the respective sources;
- (b) In the event that a VEE is not conducted during any calendar month, the permittee shall denote and maintain an explanation as to why the VEE was not performed;
- (c) If the result of a VEE indicates non-compliance with the opacity limit referenced in Condition 3.1, the permittee shall immediately determine the cause(s) for the exceedance and perform the necessary corrective action(s) to minimize emissions; and
- (d) The permittee shall maintain applicable documents pertaining to all VEEs and any corrective action(s) taken to minimize emissions as a result of any VEE.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.9 For Emission Point AA-009, the permittee shall monitor and record the total throughput (in tons per year) of dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area based on a rolling 12-month period.

The permittee shall also demonstrate compliance with the hourly throughput limit referenced in Condition 3.12 by calculating and recording an average hourly throughput each calendar month. This calculation shall be based on the monthly total throughput of dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area and the monthly total hours of operation for the planer mill area.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.10 For Emission Point AA-009, the permittee shall monitor and record the differential pressure drop on the cyclofilter daily while the planer mill area is in operation. If any daily recording is outside the differential pressure drop range referenced in Condition 3.13, the permittee shall perform the necessary maintenance to return the cyclofilter to its indicated pressure drop range / normal operation.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.11 For Emission Point AA-009, the permittee shall conduct and record a weekly inspection of the major components related to the cyclofilter. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of the cyclofilter as originally designed. The permittee shall also maintain sufficient equipment on-site as is necessary to repair the cyclofilter.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.12 For Emission Point AA-012, the permittee shall maintain a surface coating on the referenced storage tanks that complies with the coloring requirement referenced in Condition 3.14.

(Ref.: Federally Enforceable PSD Construction Permit issued on March 28, 2016 and modified as specified herein; 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.13 For Emission Point AA-014, the permittee shall monitor and record (through a non-resettable hour meter) the hours of operation for the engine during respective occasions of emergency and non-emergency service monthly. The permittee shall also detail what classified each operational occasion as an emergency or a non-emergency.

(Ref.: 40 CFR 60.4245(b); Subpart JJJJ)

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

5.14 For Emission Point AA-014, the permittee shall demonstrate compliance with the following provisions given that the emission source is a certified engine:

- (a) Confirm the purchase of a spark-ignition internal combustion engine certified to the referenced emission standards and maintain such documentation;
- (b) If the permittee operates and maintains the engine according to the manufacturer's emission-related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee must also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as they apply). If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the affected source will not be considered out of compliance;
- (c) If the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions, the affected source will be considered a non-certified engine. As such, the permittee must keep a maintenance plan, retain records of conducted maintenance to demonstrate compliance, and maintain / operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to a practicable extent). However, the permittee is not required to conduct performance testing on the engine.

(Ref.: 40 CFR 60.4243(b)(1); Subpart JJJJ)

5.15 For Emission Point AA-014, the permittee shall maintain and record the number of hours spent operating the engine with propane as a fuel source. Additionally, the permittee shall document what circumstance(s) prompted the use of propane as a fuel source (in lieu of natural gas).

(Ref: 40 CFR 60.4243(e); Subpart JJJJ)

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

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Reporting Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Submitted Documents Certified by a Responsible Official or Duly Authorized Representative
AA-001 through AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	6.2	Submit Semi-Annual Summary of Dried Lumber Throughput (for Combined Kilns)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.3	Submit Annual Compliance Certification for Kiln Operating Temperature and Final Moisture Content (for Combined Kilns)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11). 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	6.4	Submit Maintenance and Inspection Plan Submit Semi-Annual Notification of Amendment to Maintenance and Inspection Plan
AA-004 AA-007	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	6.5	Submit Semi-Annual Summary of Maintenance Actions
AA-005 AA-008 AA-009 AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	6.6	Submit Semi-Annual Summary of Visible Emission Evaluation Information
AA-009	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	6.7	Submit Semi-Annual Summary of Differential Pressure Drop Range Deviations
		6.8	Submit Semi-Annual Summary of Dried Lumber Shavings / Trim Throughput Submit Semi-Annual Summary of Monthly Average Hourly Throughput
		6.9	Submit Semi-Annual Summary of Cyclofilter Malfunctioning / Non-Operational Occurrences
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.10	Submit Hours of Operation (Non-Emergency and Emergency)

6.1 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official or duly authorized representative 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).)

- 6.2 For Emission Points AA-001 through AA-003, the permittee shall submit a semi-annual report that outlines the total throughput of dried lumber produced from the combined lumber drying kilns in thousand board feet (MBF) per year based on a rolling 12-month period no later than January 31st and July 31st of each calendar year for the preceding six-month period.

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

- 6.3 For Emission Points AA-001 through AA-003, the permittee shall submit an annual certification acknowledging each lumber drying kiln complies with both the maximum operating temperature limit of 275°F and the final moisture content limit of 10% or greater on a monthly basis no later than January 31st of each calendar year for the preceding year.

If non-compliance has been determined during a reporting period, the permittee shall include with the certification information that details the number of excursions experienced within the calendar year, the duration of each excursion experienced for respective limit, and the steps taken to return to compliance.

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

- 6.4 For Emission Points AA-001 through AA-003, the permittee shall submit the initial plan that establishes work practice standards in accordance with the manufacturer's specifications for continuous direct-fired kiln operations to the MDEQ within ninety (90) days upon issuance of this permit.

Thereafter, the permittee shall submit a semi-annual notification that summarizes any revision(s) made to the maintenance and inspection plan no later than January 31st and July 31st of each calendar year for the preceding six-month period. If an amendment is made to the plan in any six-month period, the permittee shall include the revision(s) within the corresponding semi-annual monitoring report.

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

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

- 6.5 For Emission Points AA-004 and AA-007, the permittee shall submit a semi-annual report that summarizes any maintenance action(s) performed on the building(s) / enclosure(s) necessary to maintain the applicable emissions reductions referenced in Conditions 3.9 and 3.10 no later than January 31st and July 31st of each calendar year for the preceding six-month period.

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

6.6 For Emission Points AA-005, AA-008, AA-009, and AA-011, the permittee shall submit a semi-annual report that outlines the following information no later than January 31st and July 31st of each calendar year for the preceding six-month period:

- (a) Any occurrence when a VEE was not conducted and an explanation as to why it was not performed;
- (b) Any occurrence when the result of a VEE indicates non-compliance with the referenced opacity limit and the determined cause(s) of the exceedance; and
- (c) Any corrective action(s) taken to minimize emissions as a result of an exceedance;

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

6.7 For Emission Point AA-009, the permittee shall submit a semi-annual report that summarizes all deviations of the referenced differential pressure drop range no later than January 31st and July 31st of each calendar year for the preceding six-month period.

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

6.8 For Emission Point AA-009, the permittee shall submit a semi-annual report that details the total throughput of dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area based on a rolling 12-month period no later than January 31st and July 31st of each calendar year for the preceding six-month period. Additionally, the report shall present a summary of the average hourly throughput calculated for each month in the corresponding six-month period and all supporting data.

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

6.9 For Emission Point AA-009, the permittee shall submit a semi-annual report that details any occurrence (and the corresponding duration) of the cyclofilter malfunctioning and/or becoming non-operational during active planer mill operations no later than January 31st and July 31st of each calendar year for the preceding six-month period. The report shall also outline any maintenance action(s) performed to restore the cyclofilter to its normal manner of operation.

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

6.10 For Emission Point AA-014, the permittee shall submit an semi-annual report that summarizes the hours of operation for the engine no later than January 31st and July 31st of each calendar year for the preceding six-month period. The report shall document how many hours were spent for every instance of an emergency operation, what classified each occasion as an emergency, how many hours were spent for non-emergency operation, and the circumstance(s) for each instance of non-emergency operation.

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