

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT**

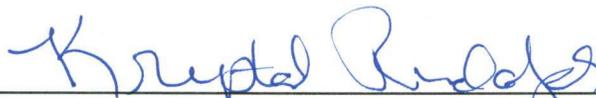
**AND PREVENTION OF SIGNIFICANT
DETERIORATION (PSD) AUTHORITY
TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

THIS CERTIFIES THAT

Southeastern Timber Products, LLC – Ackerman Plant
240 PCA Road
Ackerman, Choctaw County, 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: DEC 11 2019

Permit No.: 0400-00005

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 (NAAQS), 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 to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.
(Ref.: Miss. Code Ann. 49-17-29(1) and (2))
12. *General Nuisances:* The permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

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

When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this regulation, the MDEQ may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.

(b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.):

- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source-specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
- (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

14. *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).)

15. *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)

16. *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.)

17. *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)

18. *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.)

19. *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).)

20. *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).)

21. *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).)

22. *Beginning Operation:* Except as prohibited in Condition 24 of Section 1 – General Conditions, 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 Operating Permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due. This provision is not applicable to a source excluded from the

requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

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

23. *Application for a Permit to Operate:* Except as otherwise specified in Condition 24 of Section 1 – General Conditions, the application for issuance or modification of the State Permit to Operate or the Title V Operating 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).)

24. *Operating Under a Permit to Construct:* Except as otherwise specified in Condition 24 of Section 1 – General Conditions, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Operating 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).)

25. *Application Requirements for a Permit to Operate for Moderate Modifications:* For moderate modifications that require contemporaneous enforceable emissions reductions from more than one (1) emission point in order to “net” out of Prevention Significant Deterioration (PSD) / New Source Review (NSR), the applicable Title V Operating 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).)

26. *General Duty:* All air emission equipment shall be operated as efficiently as possible to minimize the emission of air contaminants.

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

27. *Compliance Testing:* Regarding compliance testing (as applicable):
- (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. 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 and operate, upon certification of construction completed, air emissions equipment as described in the following table:

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide (Southeastern Timber Products, LLC – Ackerman Plant)
AA-011	No. 4 Continuous Direct-Fired Lumber Drying Kiln (CDK-4) [equipped with 36 MMBTU / hour wood waste-fired sloped-grate gasifier, an abort stack, and a hood-type structure on either end of the kiln]
AA-012	No. 5 Continuous Direct-Fired Lumber Drying Kiln (CDK-5) [equipped with 36 MMBTU / hour wood waste-fired sloped-grate gasifier, an abort stack, and a hood-type structure on either end of the kiln]
AA-013	CDK-4 Fuel Bin Cyclone [transfers green sawdust from sawmill area to Green Fuel Bin for CDK-4]
AA-014	CDK-5 Fuel Bin Cyclone [transfers green sawdust from sawmill area to Green Fuel Bin for CDK-5]
AA-020	Haul Roads

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AA-002 AA-003 AA-004 AA-007	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.1	VOCs HAPs PM / PM ₁₀ / PM _{2.5}	Existing Process Unit Decommission Requirements
AA-011 through AA-014	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.2	VOCs HAPs PM / PM ₁₀ / PM _{2.5}	New Process Unit Shakedown Requirements
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.3	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.4		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.5	PM (filterable only)	$E = 4.1 (p^{0.67})$
AA-011 AA-012	40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.6	HAPs	Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.4.B.(1).	3.7	SO ₂	500 ppm (by volume)
	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.8	Fuel Restriction	Uncontaminated Wood Residue Only
	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, Ch. 5. (PSD BACT Standard)	3.9	VOCs	Install, Operate, Calibrate, and Maintain According to Manufacturer's Specifications

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AA-011 AA-012	Federally Enforceable PSD Construction Permit Issued as Specified Herein	3.10	VOCs	4.74 pounds per MBF (for Each Kiln) 568.80 tpy (for Combined Kilns; Rolling 12-Month Period)
	11 Miss. Admin. Code Pt. 2, Ch. 5 (PSD BACT Limits)	3.11	Dried Lumber Throughput	240 MMBF per Year (for Combined Kilns; Rolling 12-Month Period)
		3.12	Final Moisture Content	≥ 12%
AA-013 AA-014	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.13	PM / PM ₁₀ / PM _{2.5}	Install, Operate, Calibrate, and Maintain According to Manufacturer's Specifications
AA-020	Federally Enforceable PSD Construction Permit Issued as Specified Herein 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limit)	3.14	PM	Emissions Control Requirement

- 3.1 For Emission Points AA-002 through AA-004 and AA-007 (Batch Direct-Fired Kilns and Fuel Bin Cyclones), the permittee shall decommission the two (2) batch direct-fired lumber drying kilns and the two (2) existing dry shavings fuel bin cyclones no later than thirty (30) days after completing the respective shakedown for the No. 4 and No. 5 continuous direct-fired lumber drying kilns (i.e. Emission Points AA-011 and AA-012).

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.2 For Emission Points AA-011 through AA-014 (Continuous Direct-Fired Kilns and Fuel Bin Cyclones), the permittee may execute a shakedown of the noted continuous direct-fired lumber drying kilns and fuel bin cyclones that shall not exceed more than one hundred eighty (180) days after the start-up of each process unit.

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

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

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.3 For Emission Points AA-011 through AA-014 (Continuous Direct-Fired Kilns and Fuel Bin Cyclones), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source or any manufacturing / industrial process on-site that exceeds forty percent (40%) opacity subject to the exceptions provided as follows:
- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing (i.e. ash removal) operations shall be permitted provided such emissions do not exceed 60% opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any 1 hour.

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

- 3.4 For Emission Points AA-011 through AA-014 (Continuous Direct-Fired Kilns and Fuel Bin Cyclones), the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.5 For Emission Points AA-011 through AA-014 (Continuous Direct-Fired Kilns and Fuel Bin Cyclones), except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

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

- 3.6 Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns) are subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

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

- 3.7 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), except as otherwise specified herein, the permittee shall not cause the emission of gas containing sulfur oxides (measured as sulfur dioxide or SO₂) from the kilns in excess of five hundred (500) parts per million by volume (ppm_v).

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

- 3.8 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall only utilize uncontaminated wood waste as a fuel source. For the purpose of this permit, “*uncontaminated wood waste*” is defined as any by-product generated from processing harvested timber / dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.9 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall install, operate, calibrate, and maintain the kilns in accordance with the manufacturer’s specifications and recommendations.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein – PSD BACT Limit; 11 Miss. Admin. Code Pt. 2, Ch. 5.)

- 3.10 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall limit the emission of volatile organic compounds (VOCs) from each lumber drying kiln to no more than 4.74 pounds per thousand board feet (MBF) generated as determined by Wood Products Protocol 1 VOC (WPP1 VOC).

Additionally, VOC emissions from the combined lumber drying kilns shall not exceed 568.80 tons per year (tpy) based on a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein – PSD BACT Limit; 11 Miss. Admin. Code Pt. 2, Ch. 5.)

- 3.11 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall limit the throughput of lumber dried in the combined lumber drying kilns to no more than 240,000 thousand board feet (MBF) [or 240 million board feet (MMBF)] per year based on a rolling 12-month period.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein – PSD BACT Limit; 11 Miss. Admin. Code Pt. 2, Ch. 5.)

- 3.12 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall limit the final moisture content of dried lumber produced within each lumber drying kiln to 12% or greater.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein – PSD BACT Limit; 11 Miss. Admin. Code Pt. 2, Ch. 5.)

- 3.13 For Emission Points AA-013 and AA-014 (Fuel Bin Cyclones), the permittee shall install, operate, calibrate, and maintain the cyclones in accordance with the manufacturer's specifications and recommendations.

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.14 For Emission Point AA-020 (Haul Roads), the permittee shall maintain adequate base course coverage on the haul roads going in and out of the site to minimize the emission of particulate matter (PM). This condition shall demonstrate compliance with the sixty percent (60%) control efficiency used in the calculation of emissions from haul roads.

For the purpose of the permit, "*base course*" is defined as a loose aggregation of rock fragments (i.e. gravel).

(Ref.: Federally Enforceable PSD Construction Permit Issued as Specified Herein – PSD Avoidance Limit; 11 Miss. Admin. Code Pt. 2, Ch. 5.)

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(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.2	VOCs	Develop, Implement, and Maintain a Work Practice Standards Plan
		5.3	Dried Lumber Throughput	Monitor Throughput of Dried Lumber from Combined Kilns (Monthly and Rolling 12-Month Period)
		5.4	Final Moisture Content	Monitor Moisture Content of Dried Lumber Processed in Planer Mill Area (Rolling 12-Month Average)
		5.5	Hours of Duration	Monitor Date, Time, and Duration of Start-Up and Shutdown Period Monthly
AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.6	Opacity	Perform Monthly Visible Emissions Observations
		5.7	PM / PM ₁₀ / PM _{2.5}	Perform Monthly Maintenance Inspections
AA-020	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.8	PM	Perform Monthly Visual Inspections

5.1 For Emission Point AA-000 (Facility-Wide), 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. 2.9.)

5.2 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall develop, implement, and maintain a plan that establishes work practice standards in accordance with the manufacturer’s specifications for continuous direct-fired kiln operations. The plan shall establish a routine for conducting preventative maintenance on the kilns that includes, at a minimum, the following actions:

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

All inspections and maintenance actions shall be conducted on the specified schedule as required by the plan. If any problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of a kiln as originally designed.

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

- 5.3 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall monitor and record the throughput of lumber dried by the collective lumber drying kilns in thousand board feet (MBF) both monthly and on a rolling 12-month period.

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

- 5.4 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall demonstrate compliance with the moisture content limit specified in Condition 3.12 by monitoring and recording the moisture content of dried lumber that is processed through the planer mill on a rolling 12-month average.

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

- 5.5 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall monitor and record the date, time, and duration of every start-up and shutdown period experienced by each kiln (in which emissions are diverted to the corresponding abort stack) monthly.

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

- 5.6 For Emission Points AA-013 and AA-014 (Fuel Bin Cyclones), the permittee shall have personnel certified in Visible Emission Evaluations (VEE) under EPA Test Method 9 perform and record a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each cyclone during daylight hours and during representative operating conditions for each cyclone.

If visible emissions are detected during an observation period from a cyclone, a VEE shall then be performed and recorded in accordance with Method 9. If the visible emissions after a period of six (6) consecutive minutes are determined to be less than twenty percent (20%) opacity, the permittee may discontinue the VEE. In the event that a VEE is required but cannot be conducted on a denoted cyclone, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations were conducted.

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

- 5.7 For Emission Points AA-013 and AA-014 (Fuel Bin Cyclones), the permittee shall perform and record a monthly inspection on each cyclone to ensure that each unit is operating as originally designed. An inspection shall evaluate, at a minimum, the following components:

- (a) Blowers;
- (b) Air lock valves;
- (c) Fans; and
- (d) Any piping associated with a cyclone.

If any problem is noted during an inspection, the permittee shall conduct and record the necessary maintenance action(s) to ensure operation of the cyclone as originally designed.

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

- 5.8 For Emission Point AA-020 (Haul Roads), the permittee shall perform and record a monthly visual inspection of the haul roads going in and out of the site to evaluate the overall base course coverage.

If a haul road is found to possess inadequate base course coverage during an inspection, the permittee shall conduct and record the necessary maintenance action(s) to ensure compliance with the control efficiency specified in Condition 3.14 no later than seven (7) days after the corresponding inspection.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	6.1	Submit Notification(s) / Report(s) Certified by a Responsible Official or Duly Authorized Representative
		6.2	Report Deviation from Requirements Within Five (5) Days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C.(2).	6.3	Submit Notification on the Commencement of Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.C.(3).	6.4	Submit Notification when Construction Does Not Begin Within 18 Months
	11 Miss. Admin. Code Pt. 2, R. 2.5.D.(1). and (3).	6.5	Submit Notification on the Completion of Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit Semi-Annual Monitoring Report
AA-002 AA-003 AA-004 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.9.	6.7	Submit Notification of Completed Decommission Activities for Existing Process Units
AA-011 AA-012	11 Miss. Admin. Code Pt. 2, R. 2.9.	6.8	Submit Notification of Initial Start-Up for New Process Units Submit Notification of Shakedown Period Completion
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.9	Submit Semi-Annual Report of Dried Lumber Throughput (from Combined Kilns)
	11 Miss. Admin. Code Pt. 2, R. 2.9.	6.10	Submit Annual Compliance Certification for Final Moisture Content (for Combined Kilns)
		6.11	Submit Work Practice Standards Plan Submit Semi-Annual Notification of Amendment to Work Practice Standards Plan
		6.12	Submit Semi-Annual Report on Kilns not Operating in Accordance with Manufacturer's Specifications
AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.9.	6.13	Submit Semi-Annual Report of Visible Emission Evaluation / Cyclone Operational Information

6.1 For Emission Point AA-000 (Facility-Wide), any notification / report required by this permit to be submitted to the MDEQ shall contain a certification signed by an authorized

Responsible Official (RO) or Duly Authorized Representative (DAR) that states, 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. 2.9.)

- 6.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective action(s) / preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

- 6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall notify the MDEQ in writing that construction has begun no later than fifteen (15) days after actual construction commences.

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

- 6.4 For Emission Point AA-000 (Facility-Wide), the permittee shall notify the MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for 18 months or more.

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

- 6.5 For Emission Point AA-000 (Facility-Wide), upon the completion of construction / installation of an approved stationary source or modification, and prior to commencing operation, the permittee shall notify the MDEQ in writing that construction / installation has been completed in accordance with the approved plans and specifications on file no later than fifteen (15) days after completing the actual construction / installation of a process unit.

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

- 6.6 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein and upon certifying completion of construction, the permittee shall submit a semi-annual report that is postmarked no later than January 31st and July 31st of each calendar year for the preceding six-month period. The report shall contain any monitoring data specified in Section 6 of this permit. Additionally, all instances of deviations from permit requirements shall be clearly identified in the report.

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

- 6.7 For Emission Points AA-002, AA-003, AA-004, and AA-007 (Batch Direct-Fired Kilns and Fuel Bin Cyclones), the permittee shall notify the MDEQ in writing on the completed

decommission of the two (2) batch direct-fired lumber drying kilns and the two (2) existing dry shavings fuel bin cyclones no later than fifteen (15) days after the respective decommission date(s).

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

6.8 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall notify the MDEQ in writing about the following periods no later than fifteen (15) days after the actual respective dates:

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

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

6.9 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall submit a semi-annual report in accordance with Condition 6.6 that details the total throughput of lumber dried by the combined lumber drying kilns in thousand board feet (MBF) both monthly and on a rolling 12-month period.

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

6.10 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall submit an initial annual certification acknowledging if the lumber dried in each kiln complied with the moisture content limit specified by Condition 3.12 no later than January 31st of the applicable calendar year for the preceding year.

Thereafter, the permittee shall submit a subsequent semi-annual certification in accordance with Condition 6.6. that details if the lumber dried in each kiln complied with the specified moisture content limit.

If the certification denotes non-compliance with the referenced final moisture content limit, the permittee shall include with the corresponding certification an additional report that details the number of excursions experienced within a reporting period and the duration of each excursion experienced.

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

6.11 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall submit the initial Work Practice Standards Plan required by Condition 5.2 to the MDEQ no later than sixty (60) days after certifying completion of construction.

Thereafter, the permittee shall submit a semi-annual report in accordance with Condition 6.6 that summarizes any revision(s) made to the maintenance and inspection. 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. If no amendment has been made during a six-month period, the permittee shall make a negative declaration detailing such in the corresponding semi-annual monitoring report.

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

- 6.12 For Emission Points AA-011 and AA-012 (Continuous Direct-Fired Kilns), the permittee shall submit an semi-annual report in accordance with Condition 6.6 that details any occurrence (and its corresponding duration) of the kiln not operating in accordance with established work practice standards and/or the manufacturer's specifications.

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

- 6.13 For Emission Points AA-013 and AA-014 (Fuel Bin Cyclones), the permittee shall submit a semi-annual report in accordance with Condition 6.6 that details (at a minimum) the following information:

- (a) The results and corresponding information from any conducted visual emission evaluation (VEE);
- (b) Any occurrence and corresponding duration in which a cyclone malfunctions and/or becomes non-operational; and
- (c) An outline of any maintenance action(s) performed to restore a cyclone to its normal manner of operation.

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