# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

### THIS CERTIFIES THAT

Hankins Timbers, LLC
228 Murff Drive
Grenada, Grenada County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 14, 2020 Permit No.: 0960-00011

Air Construction Permit No.: 0960-00011

### **SECTION 1**

#### A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
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2. Any activities not identified in the application are not authorized by this permit.

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

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
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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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
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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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
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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.

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

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
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8. The permit does not convey any property rights of any sort, or any exclusive privilege.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
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9. The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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(Ref.: Miss. Code Ann. 49-17-29)
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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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10. – "Provisions for Upsets, Start-Ups, and Shutdowns".

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

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

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
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20. *Certification of Construction*: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
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21. Beginning Operation: Except as prohibited in Section 1 – 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

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

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
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23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1 – 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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
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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 Prevention of Significant Deterioration / New Source Review (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.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
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25. *General Duty*: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

26. Deviation Reporting: 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 actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

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

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

# SECTION 2 EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-100	Facility-Wide (Hankins Timbers, LLC)
AA-001	Log Debarker
AA-002	Bark and Sawdust conveyed to Truck Loadout
AA-003	Sawmill
AA-004	Chipper
AA-005	Chips conveyed to Chip Bin
AA-006	Direct-Fired Batch Drying Kiln [equipped with 24 MMBTU/hour wood-fired burner]
AA-007	Direct-Fired Continuous Drying Kiln [equipped with 40 MMBTU/hour wood-fired burner]
AA-008	Planer Mill Shavings Cyclone (used for material transfer)
AA-009	Trim Hog Cyclone (used for material transfer)
AA-010	Two (2) Aboveground Diesel Storage Tanks [includes one (1) 12,000-gallon tank and one (1) 6,000 tank]

## SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100 (Facility- Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.1	PM (filterable only)	$E = 4.1(p^{0.67})$
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity	≤ 40%
AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.3		
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Fuel Source	Combust Uncontaminated Wood Waste
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a), (b), 63.2233(a)(2), and 63.2252, Subpart DDDD	3.5	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  (PSD Avoidance Limit)	3.6	VOCs (as WPP1)	4.0 Pounds / MBF 240.0 tpy (12-Month Rolling Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  (PSD Avoidance Limit)	3.7	Lumber Throughput	120,000 MBF / Year (12-Month Rolling Total)

3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein or limited 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).)

- 3.2 For Emission Points AA-006 and AA-007, except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing or industrial process, which exceeds forty percent (40%) opacity subject to the exceptions provided below:
  - (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

3.3 For Emission Points AA-008 and AA-009, except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity, equivalent to that provided in Condition 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.4 For Emission Points AA-006 and AA-007, the permittee shall only combust uncontaminated wood waste within each burner. 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.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.5 For Emission Points AA-006 and AA-007, upon certifying completion of construction, the permittee shall be subject to all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

For the purpose of this permit, Emission Points AA-006 and AA-007 are only subject to an initial notification requirement.

(Ref.: 40 CFR 63.2231(a), (b), 63.2233(a)(2), and 63.2252, Subpart DDDD)

- 3.6 For Emission Points AA-006 and AA-007, the permittee shall limit the emission of volatile organic compounds (VOCs) as Wood Products Protocol 1 (WPP1) to no more than 4.0 pounds per thousand board feet (MBF) dried and no more than 240.0 tons per year (tpy) based on a 12-month rolling total basis.
  - (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). PSD Avoidance Limit)
- 3.7 For Emission Points AA-006 and AA-007, the permittee shall limit the total throughput of lumber dried to no more than 120,000 thousand board feet (MBF) per year based on a 12-month rolling total basis.

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

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## **SECTION 4** WORK PRACTICE STANDARDS

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

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# SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100 (Facility- Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Lumber Throughput	Monitor Total Throughput from Both Kilns
AA-008 AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Opacity	The permittee shall perform weekly VE observations of exhaust stacks. If any visible emissions are detected, EPA Reference Method 9 shall be performed.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	PM	Perform weekly inspections on the cyclones; maintenance shall be performed as necessary; records shall be maintained on site.

5.1 For Emission Point AA-100 (Facility-Wide), 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 (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by "Applicable Rules and Regulations" of this permit upon request.

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

5.2 For Emission Points AA-006 and AA-007, the permittee shall monitor the total throughput of dried lumber from both kilns in thousand board feet (MBF) based on both a monthly basis and a 12-month rolling total basis.

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

5.3 For Emission Points AA-008 and AA-009, the permittee shall demonstrate compliance with the opacity limitations outlined in Condition 3.2 by performing a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust from each cyclone during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, the permittee shall perform and record a visible emission evaluation (VEE) in accordance with EPA Test Method 9 for (at a minimum) a duration of six (6) consecutive minutes. In the event that a VEE is

required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE. The VEE shall be performed by a person who is certified as a visible emission reader by the MDEQ or an equivalent agency qualified for such services.

The permittee shall maintain a log of the visible emissions observations / VEEs and any corrective actions taken and make the log available for review upon request from the MDEQ personnel.

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

5.4 For Emission Points AA-008 and AA-009, the permittee shall perform a weekly inspection on each cyclone. Additionally, maintenance shall be performed as necessary to maintain proper operation of a cyclone. The permittee shall maintain on hand, at all times, sufficient equipment necessary to repair and/or overhaul the cyclones. In the event of that a cyclone fails, the permittee shall cease the corresponding operation until such time as repairs are made and the cyclone is restored to the proper working order and functioning at the proper efficiency.

The records of weekly inspections and any maintenance work shall be kept in log form and must be made available for review upon request during any inspection visit by the Office of Pollution Control personnel.

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

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# SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100 (Facility- Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11), R. 2.5.C(2)-(3), R. 2.5.D(1)-(3) and R. 2.9.	6.1	General Reporting Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.2	Submit a Notification on the Completion of Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.3	Submit a Semi-Annual Monitoring Report
AA-006 AA-007	40 CFR 63.2280(a) and (b), Subpart DDDD	64	Submit Initial Notifications (As Applicable)

### 6.1 General Reporting Requirements:

(a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. This report shall be made within five (5) working days of the time the deviation began.

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

(b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a Responsible Official consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.C.

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

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

(c) Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a Responsible Official stating that, based on information

and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete

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

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

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

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

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

(f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

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

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

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

6.2 For Emission Point AA-100 (Facility-Wide), upon the completion of construction / installation of all permitted emission sources 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.

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

6.3 The permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that contains the following information:

- (a) For Emission Points AA-006 and AA-007, the total throughput (in thousand board feet) of lumber dried by both kilns on a rolling 12-month total basis.
- (b) For Emission Points AA-008 and AA-009, a summary of any maintenance conducted on the cyclones and if there was any period (in hours) when the cyclones malfunctioned.

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

6.4 For Emission Points AA-006 and AA-007, the permittee shall submit to the MDEQ all of the applicable notifications found in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9 (b) – (e) and (g) and (h) by the dates specified.

Additionally, the permittee shall submit an Initial Notification to the MDEQ no later than one hundred twenty (120) days after the initial start-up of each kiln, as specified in 40 CFR 63.9(b)(2).

(Ref.: 40 CFR 63.2280(a) and (b), Subpart DDDD)