

**STATE OF MISSISSIPPI  
AND FEDERALLY ENFORCEABLE  
AIR POLLUTION CONTROL  
PERMIT**

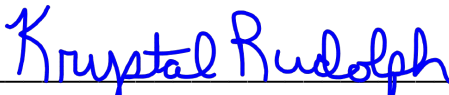
**TO OPERATE AIR EMISSIONS EQUIPMENT AT A  
SYNTHETIC MINOR SOURCE**

**THIS CERTIFIES THAT**

J T Shannon Lumber Company, Inc.  
2200 Cole Road  
Horn Lake, Desoto County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: May 3, 2021**

**Permit No.: 0680-00041**

**Effective Date: As specified herein.**

**Expires: April 30, 2026**

## 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. This permit is a federally-approved permit to operate a synthetic minor source as described in Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.4.D.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.  
  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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 constructing or operating without a valid permit.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
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 this 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 issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the 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 emission.

(Ref.: Miss. Code Ann. 49-17-21)

9. 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)

10. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this 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).)

11. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emission Equipment”. A modification may require a Permit to Construct and a modification of this permit.

“Modification” is defined as [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

- (d) Use of an alternative fuel or raw material by a stationary source which:
  - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166; or
  - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

**B. GENERAL OPERATIONAL CONDITIONS**

- 1. Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee’s previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – “Regulations for the Prevention of Air Pollution Emergency Episodes” for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10. – “Provisions for Upsets, Start-Ups, and Shutdowns”.

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

- 3. Solids removed in the course of control of air emissions shall 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.

- 4. (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

- 5. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

(a) Upsets

- (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., 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 by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during startups 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 startups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 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.)

6. *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).)

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration

terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. 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.

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

3. 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).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including (but not limited to):
  - (a) Persistent violation of any 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.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

## SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table:

| Emission Point        | Description  |
|-----------------------|--|
| AA-100                | Facility-Wide (J T Shannon Lumber Company, Inc.)   |
| AA-002                | Cyclone No. 1 [controls emissions from planing operations and a planing hogger]  |
| AA-003                | Torit / Donaldson Baghouse No. 2 [controls emissions from the Shamrock operations (i.e. sawing and sanding to produce flooring and architectural molding) and a shamrock hogger] |
| AA-004 through AA-011 | Eight (8) Steam-Heated Batch Lumber Drying Kilns   |
| AA-012                | 28.7 MMBTU/ Hour Hurst Wood Waste-Fired Boiler [constructed in February 1996]  |
| AA-013                | Cyclone No. 3 [control emissions from sorter building where lumber is graded, ripped, and trimmed]   |
| AA-021                | Steam-Heated Batch Lumber Drying Kiln  |
| AA-022                | Steam-Heated Batch Lumber Drying Kiln  |
| AA-024                | End Painting Operations  |
| AA-026                | Fugitive Emissions from the Handling of Sawdust and Wood Scraps (truck load out, loading of wood waste for boiler fuel, etc.)  |
| AA-027                | 0.06 MMBTU/ Hour Kewanee Wood Waste-Fired Back-up Boiler [constructed in 1983]   |
| AA-032 through AA-035 | Four (4) Steam-Heated Batch Lumber Drying Kilns  |
| AA-036                | Facility-Wide Storage Tanks [three (3) 275-gallon oil tanks, one (1) 2,000-gallon diesel tank, and one (1) 8,000-gallon diesel tank]   |
| AA-037                | 0.04 MMBTU/ Hour Wood-Fired Barrel Stove Heater  |
| AA-038                | Facility-Wide Maintenance Activities [consists of (but not limited to) welding and metalworking]   |



### SECTION 3 EMISSION LIMITATIONS AND STANDARDS

| Emission Point(s)         | Applicable Requirement   | Condition Number | Pollutant / Parameter   | Limitation / Standard  |
|---------------------------|--|------------------|---|--|
| AA-100<br>(Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 1.3.A.  | 3.1              | Opacity (Smoke)   | ≤ 40% (except during start-up)   |
|                           | 11 Miss. Admin. Code Pt. 2, R. 1.3.B.  | 3.2              | Opacity   | ≤ 40%  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).   | 3.3              | PM  | $E = 4.1(p^{0.67})$  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).<br><b>(PSD Avoidance Limit)</b>  | 3.4              | PM (filterable only)  | 249.0 tpy (Rolling 12-Month Total)   |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).<br><b>(Title V Avoidance Limits)</b>   | 3.5              | PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable) | 99.0 tpy (Rolling 12-Month Total)  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  | 3.6              | PM / PM <sub>10</sub> / PM <sub>2.5</sub>                       | Operate the Pollution Control Equipment at All Times the Process Equipment is in Operation |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).<br><b>(Title V Avoidance Limits)</b>   | 3.7              | VOCs (as WPP1)  | 99.0 tpy (Rolling 12-Month Total)  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  | 3.8              | HAPs  | 9.9 tpy (Individual)<br>24.9 tpy (Total)<br>(Rolling 12-Month Totals)                      |
| AA-012                    | 40 CFR Part 60, Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units<br>40 CFR 60.40c(a), Subpart Dc   | 3.9              | SO <sub>2</sub>   | General Applicability  |
| AA-012<br>AA-027          | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).   | 3.10             | SO <sub>2</sub>   | 4.8 lbs. / MMBTU   |
|                           | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(2).   | 3.11             | PM  | 0.3 grains / dscf  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).  | 3.12             | Fuel Source   | Combust Uncontaminated Wood Waste  |
|                           | 40 CFR Part 63, Subpart JJJJJ – NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources<br>40 CFR 63.11193, 63.11200(b) and (f), 63.11194(a)(1) and (b), Subpart JJJJJ | 3.13             | HAPs  | General Applicability  |

- 3.1 For Emission Point AA-100 (Facility-Wide), the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process that exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):
- (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 (60) percent 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 one (1) hour.

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

- 3.2 For Emission Point AA-100 (Facility-Wide), 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 (40) percent opacity equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AA-100 (Facility-Wide), the permittee shall not 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 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. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the total emission of particulate matter (PM; filterable only) to no more than 249.0 tons per year (tpy) based on a rolling 12-month total basis.

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

- 3.5 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the total respective emission of particulate matter less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$ ; filterable +

condensable) and particulate matter less than 2.5 µm in diameter (PM<sub>2.5</sub>; filterable + condensable) to no more than 99.0 tons per year (tpy) based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). – Title V Avoidance Limits)

- 3.6 For Emission Point AA-100 (Facility-Wide), the permittee shall operate a pollution control device at all times while the associated process equipment is in operation. In the event a pollution control device malfunctions or becomes non-operational, the permittee shall cease operation of the associated process equipment until such time as repairs are made and the proper efficiency of the pollution control device is restored. The permittee shall have on-site equipment sufficient to repair and/or overhaul the pollution control devices (to the extent practicable).

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

- 3.7 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of volatile organic compounds (VOCs) as Wood Products Protocol 1 (WPP1) to no more than 99.0 tons per year (tpy) based on a rolling 12-month total basis.

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

- 3.8 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the emission of hazardous air pollutants (HAPs) to no more than 9.9 tons per year (tpy) for any individual HAP and no more than 24.9 tpy for total combined HAPs based on a rolling 12-month total basis.

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

- 3.9 For Emission Point AA-012, the permittee is subject and shall comply with 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

- 3.10 For Emission Points AA-012 and AA-027, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU (MMBTU) input.

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

- 3.11 For Emission Points AA-012 and AA-027, while utilizing a mixture of combustibles, the emission of particulate matter (PM) shall not exceed 0.30 grains per dry standard cubic foot (gr. / dscf).

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

- 3.12 For Emission Points AA-012 and AA-027, 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).)

- 3.13 For Emission Points AA-012 and AA-027, the permittee is subject and shall comply with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63, Subpart JJJJJ.

Emission Point AA-027 qualifies as an existing biomass-fired boiler that does not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio.

Emission Point AA-012 qualifies as an existing biomass-fired boiler with an oxygen trim system that maintains an optimum air-to-fuel ratio.

(Ref.: 40 CFR 63.11193, 63.11200(b) and (f), 63.11194(a)(1) and (b), Subpart JJJJJ)

## SECTION 4 WORK PRACTICE STANDARDS

| Emission Point(s) | Applicable Requirement   | Condition Number | Pollutant / Parameter | Work Practice   |
|-------------------|--|------------------|-----------------------|---|
| AA-012<br>AA-027  | 40 CFR 63.11201(b), 63.11210(c), 63.11223(a)-(c), and 63.11225(c)(2)(i), Subpart JJJJJ | 4.1              | CO<br>NO <sub>x</sub> | Conduct Routine Tune-Ups (every 5 years for AA-012; every 2 years for AA-027) |
|                   | 40 CFR 63.11205(a), Subpart JJJJJ  | 4.2              |                       | Minimize Emissions  |

- 4.1 For Emission Point AA-012, the permittee shall conduct a tune-up every five years (no more than 61 months after the previous tune-up). For Emission Point AA-027, the permittee shall conduct a biennial tune-up (no more than 25 months after the previous tune-up). Each tune-up shall be conducted in accordance with the following specifications:
- (a) Inspect the burner (as applicable) and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown but shall not exceed 72 months after the previous inspection for Emission Point AA-012 and 36 months after previous inspection for Emission Point AA-027);
  - (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications (if available);
  - (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown but shall not exceed 72 months after the previous inspection for Emission Point AA-012 and 36 months after previous inspection for Emission Point AA-027);
  - (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxides (NO<sub>x</sub>) requirement to which the unit is subject;
  - (e) Measure the concentrations in the effluent stream of CO in parts per million by volume (ppm<sub>v</sub>) and oxygen in volume percent before and after the adjustments are made (measurements may be either on a dry or wet basis as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
  - (f) Maintain on-site and submit, if requested by the MDEQ, an annual report containing the following information:

- (1) The concentrations of CO in the effluent stream in ppm<sub>v</sub> and oxygen in volume percent measured at high fire or typical operating load before and after the tune-up of the boiler;
  - (2) A description of any corrective actions taken as a part of the tune-up;
  - (3) The date of each tune-up;
  - (4) The procedures followed for the tune-up;
  - (5) The manufacturer's specifications to which the boiler was tuned; and
  - (6) The type and amount of fuel used over the last twelve (12) months prior to tune-up of a boiler but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- (g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of start-up.

(Ref.: 40 CFR 63.11201(b), 63.11210(c), 63.11223(a)-(c), and 63.11225(c)(2)(i), Subpart JJJJJ)

- 4.2 For Emission Points AA-012 and AA-027, the permittee shall, at all times, operate and maintain the boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR Part 63, Subpart JJJJJ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boiler.

(Ref.: 40 CFR 63.11205(a), Subpart JJJJJ)

## SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point(s)  | Applicable Requirement                     | Condition Number | Pollutant/Parameter                                       | Monitoring / Recordkeeping Requirement   |
|--|--|------------------|---|--|
| AA-100<br>(Facility-Wide)  | 11 Miss. Admin. Code Pt. 2, R. 2.9.        | 5.1              | Recordkeeping   | Maintain Records For a Minimum of Five (5) Years                                       |
|  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 5.2              | VOCs<br>HAPs<br>PM / PM <sub>10</sub> / PM <sub>2.5</sub> | Calculate and Record the Emission of Each Pollutant (Monthly; Rolling 12-Month Totals) |
| AA-002<br>AA-003<br>AA-013   | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 5.3              | PM / PM <sub>10</sub> / PM <sub>2.5</sub>                 | Perform Weekly Maintenance Inspections on Pollution Control Devices                    |
|  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 5.4              |   | Calculate Emissions (Monthly; Rolling 12-Month Totals)                                 |
| AA-002<br>AA-003<br>AA-012<br>AA-013   | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 5.5              | Opacity   | Perform Weekly Visible Observations  |
| AA-004<br>through<br>AA-011<br><br>AA-021<br>AA-022<br><br>AA-032<br>through<br>AA-034 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 5.6              | VOCs  | Calculate Emissions (Monthly; Rolling 12-Month Totals)                                 |
| AA-012   | 40 CFR 60.48c(g)(2) and (i), Subpart Dc    | 5.7              | Fuel  | Record the Amount of Fuel Monthly  |
| AA-012<br>AA-027   | 40 CFR 63.11225(c), and (d), Subpart JJJJJ | 5.8              | HAPs  | Recordkeeping Requirements   |

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. Support information includes 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 Point AA-100 (Facility-Wide), the permittee shall calculate and record the respective emission of volatile organic compounds (VOCs), each individual hazardous air pollutant (HAP), all combined HAPs, particulate matter (PM; filterable only), particulate matter less than 10 microns in diameter (PM10; filterable + condensable), and particulate matter less than 2.5 microns in diameter (PM2.5; filterable + condensable) from all sources that can reasonably emit a pollutant in tons based on a monthly basis and on a rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data utilized to validate the calculated emissions (e.g. operational data, applicable emission factors, engineering judgement determinations, etc.).

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

- 5.3 For Emission Points AA-002, AA-003, and AA-013, the permittee shall perform an inspection and any required maintenance on each pollution control device weekly (or more often if necessary) to maintain proper operation. The permittee shall maintain on-site (at all times) sufficient equipment necessary to repair and/or overhaul the pollution control equipment. In the event that a cyclone or the baghouse fails, the permittee shall cease the corresponding operation until such time as repairs are made and the pollution control devices are restored to the proper working order and functioning at the proper efficiency.

A written or electronic log of the date, time, and person who performed the inspection shall be maintained onsite. These records shall be made available to the MDEQ personnel upon request.

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

- 5.4 For Emission Points AA-002, AA-003, and AA-013, the permittee shall maintain records on the total hours of operation in each month for each emission source. From the hours of operation and the latest stack test results, the permittee shall calculate (in tons) the emission of particulate matter (PM; filterable only), particulate matter less than 10 microns in diameter (PM10; filterable + condensable), and particulate matter less than 2.5 microns in diameter (PM2.5; filterable + condensable) on a monthly basis and a rolling 12-month total basis.

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

- 5.5 For Emission Points AA-002, AA-003, AA-012, and AA-013, 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 stack 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).)

- 5.6 For Emission Points AA-004 through AA-011, AA-021, AA-022 and AA-032 through AA-034, the permittee shall maintain records on the total throughput of each type of lumber dried by the combined kilns (i.e. hardwood or softwood) in thousand board feet (MBF) on a monthly basis and a rolling 12-month total basis. The permittee shall use the recorded throughput of each type of lumber and the appropriate emission factors to calculate the emission of volatile organic compounds (VOCs) in tons on a monthly basis and a rolling 12-month basis.

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

- 5.7 For Emission Point AA-012, the permittee shall record and maintain records on the amount of fuel combusted during each month. All records shall be maintained for a period of two (2) years following the date of such record.

(Ref.: 40 CFR 60.48c(g)(2) and (i), Subpart Dc)

- 5.8 For Emission Points AA-012 and AA-027, the permittee shall maintain the following records:

- (a) As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that was submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted;
- (b) For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report;
- (c) Records on the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment;
- (d) Records on actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Condition 4.2 including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation; and

- (e) Records must be in a form suitable and readily available for expeditious review. These records shall be retained for five (5) years following the date of each recorded action. The permittee is required to keep each record on-site, or the records must be accessible from a central location by computer or other means that instantly provide access at the site for at least two (2) years after the date of each recorded action. The permittee may keep the records off site for the remaining three (3) years.

(Ref.: 40 CFR 63.11225(c), and (d), Subpart JJJJJ)

## SECTION 6 REPORTING REQUIREMENTS

| Emission Point(s)         | Applicable Requirement                     | Condition Number | Reporting Requirement  |
|---------------------------|--|------------------|--|
| AA-100<br>(Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 6.1              | Report Permit Deviations Within Five (5) Working Days                        |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 6.2              | Submit a Certified Annual Monitoring Report                                  |
|                           | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).  | 6.3              | All Documents Submitted to MDEQ Shall Be Certified by a Responsible Official |
| AA-012<br>AA-027          | 40 CFR 63.11225(b)(1) – (2), Subpart JJJJJ | 6.4              | Prepare a Compliance Certification Report (Submit Upon Request by the MDEQ)  |

6.1 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. The report shall be made within five (5) working days of the time the deviation began.

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

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual monitoring report (AMR) postmarked no later than January 31<sup>st</sup> of each calendar year for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. 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. This report shall provide the information outlined in Conditions 5.2, 5.4 and 5.6 of this permit.

In addition, the AMR shall include the following information:

- (a) For Emission Points AA-002, AA-003, AA-012 and AA-01: a summary of the visible emission observations and any instances in which a visible emission evaluation (VEE) was required but not performed (along with the corresponding explanation).
- (b) For Emission Points AA-002, AA-003 and AA-013: a summary of any maintenance conducted on the cyclones and baghouse and if there was any period (in hours) when the pollution control devices malfunctioned.

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

- 6.3 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).)

- 6.4 For Emission Points AA-012 and AA-027, the permittee shall prepare by March 1<sup>st</sup> of each applicable calendar year, and submit to the MDEQ upon request, a biennial compliance certification report for the previous two calendar years for Emission Point AA-027 and a five-year compliance certification report for the previous five calendar years for Emission Point AA-012 that contains the following information:

- (a) Company name and address; and
- (b) A statement by a responsible official (with the official's name, title, phone number, email address, and signature) certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJ. The notification must include the following certification(s) of compliance (as applicable) and signed by a responsible official:
  - (1) “This facility complies with the requirements in Condition 4.1 to conduct a biennial tune-up on Emission Point AA-027 (or) a five-year tune-up on Emission Point AA-012”; and
  - (2) “No secondary materials that are solid waste were combusted in the boiler.”

(Ref.: 40 CFR 63.11225(b)(1) – (2), Subpart JJJJJ)