STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Weyerhaeuser NR Company, Bruce Facility
106 Railroad Street
Bruce, Mississippi
Calhoun County

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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and 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.

Permit Issued: February 1, 2024

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: January 31, 2029 Permit No.: 0300-00032

TABLE OF CONTENTS

SECTION 1.	GENERAL CONDITIONS 3	
SECTION 2.	EMISSION POINTS & POLLUTION CONTROL DEVICES 14	
SECTION 3.	EMISSION LIMITATIONS & STANDARDS 15	
SECTION 4.	COMPLIANCE SCHEDULE 24	
SECTION 5.	MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS	25
SECTION 6.	ALTERNATIVE OPERATING SCENARIOS 33	
SECTION 7.	TITLE VI REOUIREMENTS 34	

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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. 6.3.A(6)(c).)

- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
 - (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

1.5 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 permittee or, for information to be confidential, the permittee shall furnish such records to 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. 6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

1.7 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. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such

direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

(d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

(e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
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1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
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- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - (a) Enter upon the permittee's premises where a Title V source is located or emissionsrelated activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
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Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
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1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
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1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
 - (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
 - (a) The changes are not modifications under any provision of Title I of the Act;
 - (b) The changes do not exceed the emissions allowable under this permit;

- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) A brief description of the change(s),
 - (2) The date on which the change will occur,
 - (3) Any change in emissions, and
 - (4) Any permit term or condition that is no longer applicable as a result of the change;
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment," and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act." 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 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 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).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or

Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:
 - (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
 - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- Title V Operating Permit No. 0300-00032
- (4) The permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

- 1.25 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 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 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) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Startups 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 startups 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 regulation, 11 Mississippi Administrative Code, 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 startups 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 startup or shutdown, see the upset requirements above.

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

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

- 1.27 Regarding compliance testing (if 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), and (6).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description			
AA-100	Facility-Wide (Weyerhaeuser NR Company, Bruce Facility)			
AA-004	Truck Chip Storage Bin Cyclone (Ref. No. 105)			
AA-005	No. 1 Planer Cyclone (Ref. No. 109)			
AA-006	No. 1 Planer Shavings Truck Storage Bin Cyclone (Ref. No. 110)			
AA-008	Log Deck Cut-Off Saws [fugitive] (Ref. No. F003)			
AA-009	Ring Debarker [fugitive] (Ref. No. F004)			
AA-010	Planer Shavings Truck Loading Storage Bin [fugitive] (Ref. No. F005)			
AA-011	Hog Fuel Storage Bin [fugitive] (Ref. No. F006)			
AA-012	Bark Hog [fugitive] (Ref. No. F007)			
AA-014	Hog Fuel Storage Pile [fugitive] (Ref. No. F009)			
AA-015	Haul Roads [fugitive] (Ref. No. F010)			
AA-016	Bark / Green Sawdust Storage Bin for Truck Loading Operations [fugitive] (Ref. No. F011)			
AA-017	215 HP (160 kW) Compression Ignition (CI) Emergency Fire Water Pump Engine [max. heat input: 1.61 MMBTU / hour; manufactured before June 12, 2006]			
AA-018	Direct-Fired Continuous Drying Kiln [equipped with a 35 MMBTU / hour wood-fired grate gasifier burner and an abort stack (for start-up, shutdown, and idling periods)] (Ref. No. CDK-5)			
AA-019	Direct-Fired Continuous Drying Kiln [equipped with a 35 MMBTU / hour wood-fired grate gasifier burner and an abort stack (for start-up, shutdown, and idling periods)] (Ref. No. CDK-6)			
AA-020	Fuel Silo Cyclone for Emission Point AA-018 (Ref. No. CDKC-5)			
AA-021	Fuel Silo Cyclone for Emission Point AA-019 (Ref. No. CDKC-6)			
AA-022	Fuel Silo Cyclone for Emission Point AA-023 (Ref. No. CDKC-4)			
AA-023	Direct-Fired Continuous Drying Kiln [equipped with 35 MMBTU / hour wood-fired grate gasifier burner, an abort stack (for and start-up / shutdown periods), and a bypass stack (for idling periods)] (Ref. No. CDK-4)			

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
 - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations 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 hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.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.A.3 For the entire facility, the permittee shall not cause, permit, 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.
 - (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
 - (b) 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 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne 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.)

B. <u>EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-100 (Facility- Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable)	$E = 4.1(p^{0.67})$
AA-017	11 Miss. Admin. Code Pt, 2, R. 1.3.D(1)(a).	3.B.2	PM (filterable)	0.6 lb. / MMBTU
	40 CFR Part 63, Subpart ZZZZ - NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585(a), (b), and 63.6590(a)(1)(ii); Subpart ZZZZ	3.B.3	HAPs	General Applicability
	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ	3.B.4	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non- Emergency Situations
AA-018 AA-019 AA-023	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued April 1, 2016 and modified August 17, 2021	3.B.5	Fuel Source Restriction	Combust Uncontaminated Wood Waste and Char (Diesel May be Used During a Start-Up Period)
	40 CFR Part 63, Subpart DDDD - NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a), (b), and 63.2233(a); Subpart DDDD	3.B.6	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021	3.B.7	VOCs (as WPP1)	4.52 Pounds / MBF; and 734.5 tpy (12-Month Rolling Total)
		3.B.8	Dried Lumber Throughput	325,000.0 MBF / Year (Combined Kilns; 12-Month Rolling Total)
	(PSD BACT Limits)	3.B.9	Final Moisture Content	≥12.0% (Monthly Average)

3.B.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.B.2 For Emission Point AA-017, the maximum permissible emission of ash and/or PM from any fossil fuel burning installations with a heat input of less than ten (10) million BTU (MMBTU) per hour shall not exceed 0.6 pounds per MMBTU heat input.

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

3.B.3 For Emission Point AA-017, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as outlined in Table 8 of Subpart ZZZZ).

For purposes of this permit, Emission Point AA-017 is considered an "existing" emergency, compression ignition (CI) stationary RICE as construction commenced before June 12, 2006.

(Ref.: 40 CFR 63.6580, 63.6585(a), (b), and 63.6590(a)(1)(ii); Subpart ZZZZ)

- 3.B.4 For Emission Point AA-017, any operation of an engine other than emergency operation, maintenance and testing, and operation in non-emergency situations for more than fifty (50) hours per year, as described in (c) below, is prohibited. If the engine is not operated in accordance with (a) through (c) below, the engine will not be considered an emergency engine under the applicable subpart and must meet all requirements for a non-emergency engine.
 - (a) There is no limit on the use of the engine during an emergency situation.
 - (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of one hundred (100) hours per calendar year provided the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for

- maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1) - (3); Subpart ZZZZ)

3.B.5 For Emission Points AA-018, AA-019 and AA-023, the permittee shall only combust uncontaminated wood waste and char within the kiln burners. 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 and, "char" is defined as the product of combusting "uncontaminated wood waste" in the kiln burners.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition. The permittee is authorized to use up to ten (10) gallons of diesel to ignite the fuel bed during a start-up period.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued April 1, 2016 and modified August 17, 2021)

3.B.6 For Emission Points AA-018, AA-019, and AA-023, the permittee is subject to and comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

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

3.B.7 For Emission Points AA-018, AA-019 and AA-023, the permittee shall limit the emission of volatile organic compounds as determined by Wood Products Protocol 1 (VOCs as WPP1) to no more than 4.52 pounds per thousand board feet (MBF) and no more than 734.5 tons per year (tpy) based on a 12-month rolling total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021 – PSD BACT Limit)

- 3.B.8 For Emission Points AA-018, AA-019, and AA-023, the permittee shall limit the total throughput of lumber dried in the combined kilns to no more than 325,000.0 thousand board feet (MBF) per year based on a 12-month rolling total basis.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021 PSD BACT Limit)
- 3.B.9 For Emission Points AA-018, AA-019, and AA-023, the permittee shall limit the final moisture content of dried lumber produced within each kiln to 12.0% or greater based on a monthly average.
 - (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021 PSD BACT Limit)

C. <u>INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS</u>

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb. / MMBTU

3.C.1 The maximum permissible emission of ash and/or PM from fossil fuel burning installations of less than 10 MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
	40 CFR 63.6602, 63.6625(i) and Table 2c (Item 1); Subpart ZZZZ	3.D.1		Maintenance Requirements
AA-017	40 CFR 63.6605(b); Subpart ZZZZ	3.D.2	НАР	General Duty Clause
	40 CFR 63.6625(e)(2), 63.6640(a) and Table 6 (Item 9); Subpart ZZZZ	3.D.3		Perform Work Practices
AA-018 AA-019 AA-023	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021 (PSD BACT Standard)	3.D.4	VOCs	Maintain a Good Work Practices Plan

- 3.D.1 For Emission Point AA-017, the permittee must comply with the following requirements:
 - (a) Change the oil and filter every five hundred (500) hours of operation or annually (whichever comes first).

The permittee also has the option to using an oil analysis program in order to extend the noted oil change requirement in accordance with the following specifications:

- (1) The oil analysis shall be performed at the same frequency specified for changing the oil as outlined in paragraph (a) of this condition;
- (2) The analysis program shall (at a minimum) analyze the Total Base Number, viscosity, and percent water content. The condemning limits for each noted parameter are as follows:
 - (i) Total Base Number is less than thirty (30) percent of the Total Base Number of the oil when new;
 - (ii) Viscosity of the oil has changed by more than twenty (20) percent from the viscosity of the oil when new; and
 - (iii) Percent water content (by volume) is greater than 0.5.

If none of the condemning limits are exceeded, the permittee is not required to change the oil. However, if any of the limits are exceeded, the permittee shall change the oil within two (2) business days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee

shall change the oil within two (2) business days or before commencing operation (whichever is later).

The permittee shall maintain records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. Additionally, the analysis program shall be part of the maintenance plan for an engine.

If an engine is operating during an emergency situation and it is not possible to perform the oil change on the required schedule or if performing the oil change on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the oil change can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The oil change should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. The permittee shall report any failure to perform the oil change on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable.

- (b) Inspect the air cleaner every one thousand (1,000) hours of operation or annually (whichever comes first) and replace when necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually (whichever comes first) and replace as necessary.
- (d) The permittee shall minimize the engine's time spent at idle and minimize the engine's start-up time to a period needed for appropriate and safe loading of an engine, not to exceed thirty (30) minutes, after which time the applicable non-startup emission limitations apply.

(Ref.: 40 CFR 63.6602, 63.6625(i), and Table 2c (Item 1); Subpart ZZZZ)

3.D.2 For Emission Point AA-017, the permittee shall at all times operate and maintain the engine (including associated air pollution control 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 any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ, which 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 source.

(Ref.: 40 CFR 63.6605(b); Subpart ZZZZ)

- 3.D.3 For Emission Point AA-017, the permittee shall adhere to the following work practices:
 - (a) Operate and maintain an engine and control device (if any) in accordance with the manufacturer's emission-related written instructions; or
 - (b) Develop a maintenance plan that must outline the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

(Ref. 40 CFR 63.6625(e)(2), 63.6640(a) and Table 6 (Item 9); Subpart ZZZZ)

3.D.4 For Emission Points AA-018, AA-019, and AA-023, the permittee shall maintain the "Good Work Practices Plan" (received on November 4, 2022) that establishes work practice standards in accordance with the manufacturer's recommendations for continuous direct-fired kiln operations. The permittee shall perform all inspections and maintenance actions on the schedule specified in the plan. If any problem is noted during an inspection, the permittee shall perform the necessary unscheduled maintenance to ensure the operation of the kiln as originally designed.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued August 17, 2021 – PSD BACT Standard)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following:
 - (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
 - (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions existing at the time of sampling or measurement.

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information 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 for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 11 Miss. Admin. Code Pt. 2, R. 6.2.E. For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be

submitted by the end of the month following each calendar quarter (i.e., April 30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

5.A.5 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. 6.3.A(3)(c)(2).)

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

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

5.A.8 Unless otherwise specified in Section 4, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

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

B. <u>SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS</u>

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-100 (Facility- Wide)	40 CFR 52.21(r)(6)(iii); Subpart A	5.B.1	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable)	Calculate and Maintain Project- Related Emissions Increases
AA-004 AA-005 AA-006 AA-020 AA-021 AA-022	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Opacity	Perform Monthly Visible Emission Observations
		5.B.3	PM / PM ₁₀ / PM _{2.5} (filterable only)	Perform Monthly Inspections on the Cyclones
AA-017	40 CFR 63.6655(a)(1), (2), (5), (d), and (e)(2); Subpart ZZZZ	5.B.4	HAPs	Recordkeeping Requirements
	40 CFR 63.6655(f)(1); Subpart ZZZZ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.5	Emergency Engine Status	Monitor Hours of Operation Monthly (Emergency and Non-Emergency)
AA-018 AA-019 AA-023	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	Dried Lumber Throughput VOCs	Monitor the Total Throughput and Total Emissions from the Combined Kilns (Monthly and 12-Month Rolling Total)
		5.B.7	VOCs	Maintain Records on the Inspections / Maintenance Actions Performed for the Good Work Practices Plan
		5.B.8	Final Moisture Content	Continuously Monitor the Moisture Content of Dried Lumber Processed through the Planer Mill
				Determine the Average Moisture Content (Monthly Average)
		5.B.9	PM / PM ₁₀ /	Monitor Date, Time, and Duration of Each Start-Up / Shutdown / Idling Period
			PM _{2.5}	Calculate Total Duration of All Applicable Periods (Rolling 12- Month Period)

5.B.1 For Emission Point AA-100 (Facility-Wide), the permittee shall monitor the respective emission increase of filterable particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM₁₀; filterable + condensable), and particulate matter less than 2.5 μm in diameter (PM_{2.5}; filterable + condensable) as a result of the construction project proposed in the permit application received on May 4, 2021.

The permittee shall calculate and record the respective pollutant emissions in tons per year on a 12-month calendar year basis from all sources affected by the proposed construction project for a duration of five (5) years following the resumption of regular operations after the permitted modifications in accordance with 40 CFR 52.21(r)(6)(i)(c); Subpart A.

(Ref.: 40 CFR 52.21(r)(6)(iii); Subpart A)

5.B.2 For Emission Points AA-004 through AA-006 and AA-020 through AA-022, the permittee shall demonstrate compliance with the opacity limitations outlined in Conditions 3.A.1 and 3.A.2 by performing a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each stack during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform 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 permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of an evaluation, and the date / time when each observation / evaluation was conducted.

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

5.B.3 For Emission Points AA-004 through AA-006 and AA-020 through AA-022, the permittee shall perform a monthly inspection on each cyclone. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a cyclone.

The permittee shall maintain documentation that details the date / time each inspection performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return a cyclone to operation as originally designed, and any periods of time (including date and duration) in which a cyclone was non-operational during active operations.

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

- 5.B.4 For Emission Point AA-017, the permittee shall keep the following records:
 - (a) All notifications submitted to comply with Subpart ZZZZ;
 - (b) Records on the occurrence and duration of each malfunction of the engine or hour meter:
 - (c) Records on the actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore equipment to its normal manner of operation;
 - (d) Records required in Condition 3.D.3 to show continuous compliance with the applicable emission or operating limit; and
 - (e) Records on all maintenance done on the engine in order to demonstrate that the engine was operated and maintained in accordance with the maintenance plan specified in Condition 3.D.1.

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(Ref.: 40 CFR 63.6655(a)(1), (2), (5), (d), and (e)(2); Subpart ZZZZ)
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5.B.5 For Emission Point AA-017, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for the engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an "emergency" or a "non-emergency" service that are recorded by the hour meter on a calendar year basis. The permittee shall record the time of operation and the reason the engine was in operation during that time.

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(Ref.: 40 CFR 63.6655(f)(1); Subpart ZZZZ)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
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5.B.6 For Emission Points AA-018, AA-019, and AA-023, the permittee shall monitor the total throughput of dried lumber from the combined kilns in thousand board feet (MBF) based on both a monthly and a 12-month rolling total basis.

Additionally, the permittee shall calculate and record the total emission of VOCs from the combined kilns both a monthly and a 12-month rolling total basis.

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(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
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5.B.7 For Emission Points AA-018, AA-019 and AA-023, the permittee shall maintain records that detail the results of each inspection and maintenance action (preventative or unscheduled) performed on a kiln in accordance with the "Good Work Practices Plan" required by Condition 3.D.4.

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

5.B.8 For Emission Points AA-018, AA-019, and AA-023, the permittee shall demonstrate compliance with moisture content limitation specified in Condition 3.B.9 by continuously monitoring and maintaining the moisture of dried lumber processed in the planer mill and determining an average final moisture content on a monthly basis.

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

5.B.9 For Emission Points AA-018, AA-019, and AA-023, the permittee shall monitor and record the date, time, and duration of each start-up, shutdown, and idling period experienced by each gasifier burner in which emissions are diverted to a corresponding abort stack and/or bypass stack.

Additionally, the permittee shall calculate and record the total duration of all applicable periods for all kilns in hours per year based on a rolling 12-month period.

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Reporting Requirement
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	PM / PM ₁₀ / PM _{2.5} (filterable only)	Submit Semi-Annual Monitoring
			Dried Lumber Throughput	
AA-100			VOCs	Report
(Facility-Wide)			Final Moisture Content	
	40 CER 52 21(2)(C)(-)	5.C.2	PM (filterable)	Submit Calculated Annual Emissions
	40 CFR 52.21(r)(6)(v); Subpart A		PM ₁₀ / PM _{2.5} (filterable + condensable)	
AA-017	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.3	Hours of Operation (Emergency and Non-Emergency)	Submit an Annual Report of the Hours of Operation for the Engine

- 5.C.1 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information:
 - (a) For Emission Points AA-004 through AA-006 and AA-020 through AA-022, the report shall include:
 - (1) Any occurrence when a visible emissions evaluation (VEE) was necessary but not conducted and an explanation as to why it was not performed;
 - (2) Any maintenance action(s) performed on a cyclone and any periods of time (including date and duration) in which a cyclone was non-operational during active corresponding operations;
 - (b) For Emission Points AA-018, AA-019, and AA-023, the report shall include:
 - (1) The total throughput (in thousand board feet) of lumber dried by the combined kilns both on a monthly and 12-month rolling total basis;
 - (2) The total emission of volatile organic compounds (VOCs) from the combined kilns both on a monthly and a 12-month rolling total basis;
 - (3) The average moisture content of all dried lumber processed during each month;

- (4) Any changes that have been made to the "Good Work Practices Plan" required by Condition 3.D.4;
- (5) The total duration of all start-up, shutdown, and idling periods for the combined kilns in which emissions are diverted to the corresponding abort stack and/or bypass stack based on a rolling 12-month total.

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

- 5.C.2 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 when applicable) of each year for the preceding 12-month calendar year that contains the following information:
 - (a) The name, address, and telephone number of the facility;
 - (b) The calculated annual emissions as specified in Condition 5.B.1; and
 - (c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections).

Additionally, the report shall contain the following information if the calculated annual emissions specified in Condition 5.B.1 meet the following criteria:

- (d) Exceed the baseline actual emissions documented in the pre-construction Prevention of Significant Deterioration (PSD) major modification applicability test by a "significant" [as defined by 40 CFR 52.21(b)(23); Subpart A] amount for the pollutants referenced in Condition 5.B.1; and
- (e) Differ from the established pre-construction projected emissions presented in the permit application received on May 4, 2021.

(Ref.: 40 CFR 52.21(r)(6)(v); Subpart A)

- 5.C.3 For Emission Point AA-017, the permittee shall submit the following information with the SMR, as specified in Condition 5.C.1, that is due no later than January 31 of each year:
 - (a) The hours the engine operated during an emergency situation and what classified the operation as emergency; and
 - (b) The hours the engine operated in a non-emergency situation and the reason for the non-emergency operation.

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at http://www.ecfr.gov/ under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E

 The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well

as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H Halon Emissions Reduction:
 - (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

BACT Best Available Control Technology CEM Continuous Emission Monitor

CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

CO Carbon Monoxide

COM Continuous Opacity Monitor

COMS Continuous Opacity Monitoring System

DEQ Mississippi Department of Environmental Quality EPA United States Environmental Protection Agency

gr/dscf Grains Per Dry Standard Cubic Foot

HP Horsepower

HAP Hazardous Air Pollutant lb/hr Pounds per Hour

M or K Thousand

MACT Maximum Achievable Control Technology

MM Million

MMBTUH Million British Thermal Units per Hour

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emissions Standards for Hazardous Air Pollutants, 40 CFR

61, or National Emission Standards for Hazardous Air Pollutants for

Source Categories, 40 CFR 63

NMVOC Non-Methane Volatile Organic Compounds

NO_x Nitrogen Oxides

NSPS New Source Performance Standards, 40 CFR 60

O&M Operation and Maintenance

PM Particulate Matter

PM $_{10}$ Particulate Matter less than 10 μ m in diameter PM $_{2.5}$ Particulate Matter less than 2.5 μ m in diameter

ppm Parts per Million

PSD Prevention of Significant Deterioration

SIP State Implementation Plan

SO₂ Sulfur Dioxide

SSM Startup, Shutdown, and Malfunction

TPY Tons per Year

TRS Total Reduced Sulfur

VEE Visible Emissions Evaluation
VHAP Volatile Hazardous Air Pollutant

VOHAP Volatile Organic Hazardous Air Pollutant

VOC Volatile Organic Compound