

### State of Mississippi



### AIR POLLUTION CONTROL PERMIT

Permit To Construct Air Emissions Equipment

#### THIS CERTIFIES

Weyerhaeuser NR Company, Philadelphia Facility
1016 Weyerhaeuser Road
Philadelphia, MS
Neshoba County

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

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: MAR 2 1 2014

Expires:

Permit No. 1920-00012

Agency Interest # 5197

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Weyerhaeuser NR Company, Philadelphia Facility Subject Item Inventory Permit Number:1920-00012 Activity ID No.: PER20130002

### **Subject Item Inventory:**

ID	Designation	Description
AI5197		
CONT1	AA-031	Planer Trim Hog Cyclone
CONT2	AA-032	Primary Planer Shavings Cyclone

KEY	
ACT = Activity	AI = Agency Interest
AREA = Area	CAFO = Concentrated Animal Feeding Operation
CONT = Control Device	EQPT = Equipment
IA = Insignificant Activity	IMPD = Impoundment
MAFO = Animal Feeding Operation	PCS = PCS
RPNT = Release Point	TRMT = Treatment
WDPT = Withdrawal Point	

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#### AI000005197:

# Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-031 and AA-032, the permittee shall not cause, permit, or allow the emission of PM (filterable only) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship
		$E = 4.1 \text{ p}^{0.67}$
		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. [11 Miss. Admin. Code Pt. 2, R. 1.3.F(1)]

## Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C(2).]
S-3	The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

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#### AI000005197 (continued):

# Narrative Requirements:

#### **General Condition:**

	Concrat Condition.		
Condition No.	Condition		
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]		
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]		
T-3	General Condition: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. [Miss. Code Ann. 49_17_29]		
T-4	General Condition: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]		
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff 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. [Miss. Code Ann. 49_17_21]		
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistant 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 any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]		
T-7	General Condition: 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. [Miss. Code Ann. 49_17_39]		

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#### AI000005197 (continued):

# Narrative Requirements:

Condition No.	Condition
T-8	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]

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#### AI000005197 (continued):

# Narrative Requirements:

Condition No.	Condition
T-17	General Condition: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]
T-18	General Condition: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by APC-S-2, Section XIII.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to net out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]

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#### AI000005197 (continued):

# Narrative Requirements:

Condition No.	Condition
T-24	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&(6).]
T-25	General Condition: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]

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### CONT000000001 (AA-031) Planer Trim Hog Cyclone:

# Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		PM/PM10 (filterable only) 1.44 lb/hr based on a 3 hour average, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8 and EPA Reference Method 201 and 201A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2		PM2.5 (filterable only) 0.16 lb/hr based on a 3 hour average, as determined by EPA Reference Method 201A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-3		Opacity 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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#### CONT0000000001 (continued):

# Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall demonstrate compliance with the PM/PM10 limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8 and EPA Reference Method 201 and 201A. The permittee shall demonstrate compliance within 180 days of startup and biennial thereafter. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
M-2		The permittee shall demonstrate compliance with the PM2.5 limitations by stack testing in accordance with EPA Reference Method 201A. The permittee shall demonstrate compliance within 180 days of startup. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance. For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
M-3		The permittee shall perform visible emission observations on a monthly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
M-4		The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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### CONT000000002 (AA-032) Primary Planer Shavings Cyclone:

# Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1		PM/PM10 (filterable only) 6.84 lb/hr based on a 3 hour average, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8 and EPA Reference Method 201 and 201A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-2		PM2.5 (filterable only) 0.75 lb/hr based on a 3 hour average, as determined by EPA Reference Method 201A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-3		Opacity 40% as determined by EPA Reference Method 9, 40 CFR 60, Appendix A.
		All test methods specified above shall be those versions, or their approved equivalents, which are in effect Issuance Date. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

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### CONT0000000002 (continued):

# Monitoring Requirements:

Conditio	Condition					
No.	Parameter	Condition				
M-1		The permittee shall demonstrate compliance with the PM/PM10 limitations by stack testing in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A or EPA Approved Oregon Method 8 and EPA Reference Method 201 and 201A. The permittee shall demonstrate compliance within 180 days of startup and biennial thereafter. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance.  For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]				
M-2		The permittee shall demonstrate compliance with the PM2.5 limitations by stack testing in accordance with EPA Reference Method 201A. The permittee shall demonstrate compliance within 180 days of startup. The test report shall be submitted within sixty (60) days of completion of demonstration of compliance.  For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test. For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. An EPA Reference Method 9 VEE shall be performed concurrently with each run of all required stack tests for this emission point. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]				
M-3		The permittee shall perform visible emission observations on a monthly basis. If during the visible observation any visible emissions are noted, the permittee shall perform an EPA Reference Method 9 Visible Emission Evaluation (VEE). The results of these observations and/or VEE's shall be recorded and maintained for a period of five (5) years. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]				
M-4		The permittee shall perform a physical inspection of the cyclones at least annually to determine if preventive maintenance is required to assure proper operation. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]				

### **GENERAL INFORMATION**

Weyerhaeuser NR Company, Philadelphia Facility 1016 Weyerhaeuser Road Philadelphia, MS Neshoba County

#### **Alternate/Historic Identifiers**

ID	Alternate/Historic Name	User Group	Start Date	End Date
5197	Weyerhaeuser NR Company	Official Site Name	12/8/2008	
2809900012	Weyerhaeuser NR Company, Philadelphia Facility	Air-AIRS AFS	10/12/2000	
MSD980557375	Weyerhaeuser Company	Hazardous Waste-EPA ID	7/13/2000	6/18/2009
192000012	Weyerhaeuser Company, Philadelphia Facility	Air-Title V Operating	9/9/1999	9/1/2004
MSR000696	Weyerhaeuser Company, Philadelphia Facility	GP-Baseline	11/24/1992	10/27/2000
MSP091379	Weyerhaeuser Company, Philadelphia Facility	Water - Pretreatment	10/1/1997	9/19/2002
MS0001961	Weyerhaeuser Company, Philadelphia Facility	Water - NPDES	12/18/1990	12/17/1995
MS0001961	Weyerhaeuser Company, Philadelphia Facility	Water - NPDES	6/23/1992	12/17/1995
MSP091379	Weyerhaeuser Company, Philadelphia Facility	Water - Pretreatment	7/28/1999	9/19/2002
MS0001961	Weyerhaeuser Company, Philadelphia Facility	Water - NPDES	1/2/2002	12/31/2006
MSR000696	Weyerhaeuser Company, Philadelphia Facility	GP-Baseline	10/27/2000	12/22/2005
MSP091379	Weyerhaeuser Company	Water - Pretreatment	10/16/2002	9/30/2007
192000012	Weyerhaeuser Company, Philadelphia Facility	Air-Construction	3/17/2005	2/13/2009
MSR000696	Weyerhaeuser Company, Philadelphia Facility	GP-Baseline	12/22/2005	2/13/2009
192000012	Weyerhaeuser NR Company, Philadelphia Facility	Air-Title V Fee Customer	9/9/1999	
SW0500040450	Weyerhaeuser Company, Weyerhaeuser Industrial Landfill	SolidWaste - NonMSW Landfill	2/11/1997	1/22/2007
SW0500040450	Weyerhaeuser Company, Weyerhaeuser Industrial Landfill	SolidWaste - NonMSW Landfill	1/22/2007	5/20/2009
MS0001961	Weyerhaeuser Company, Philadelphia Facility	Water - NPDES	9/18/2007	2/13/2009
MSP091379	Weyerhaeuser Company, Philadelphia Facility	Water - Pretreatment	10/4/2007	2/13/2009
192000012	Weyerhaeuser Company, Philadelphia Facility	Air-Title V Operating	9/3/2008	2/13/2009
5197 001	Weyerhaeuser Company, Old Radio Tower Area	GARD	12/18/1990	
5197 002	Weyerhaeuser Company, Old Timber Sizer Area	GARD	12/18/1990	
5197 003	Weyerhaeuser Company, Old Wood Treatment Area	GARD	12/18/1990	

### **GENERAL INFORMATION**

ID	Alternate/Historic Name	User Group	Start Date	End Date
5197 004	Weyerhaeuser Company, Spray Pond Area	GARD	12/18/1990	
5197	Weyerhaeuser Company	Historic Site Name	12/18/1990	12/8/2008
192000012	Weyerhaeuser NR Company, Philadelphia Facility	Air-Title V Operating	2/13/2009	8/31/2013
192000012	Weyerhaeuser NR Company, Philadelphia Facility	Air-Construction	2/13/2009	
MS0001961	Weyerhaeuser NR Company, Philadelphia Facility	Water - NPDES	2/13/2009	8/31/2012
MSP091379	Weyerhaeuser NR Company, Philadelphia Facility	Water - Pretreatment	2/13/2009	9/30/2012
MSR000696	Weyerhaeuser NR Company, Philadelphia Facility	GP-Baseline	2/13/2009	3/28/2011
SW0500040450	Weyerhaeuser NR Company, Weyerhaeuser Industrial Landfill- Philadelphia	SolidWaste - NonMSW Landfill	5/20/2009	12/31/2016
MSD980557375	Weyerhaeuser, Offsite Disposal Area	Hazardous Waste-EPA ID	6/18/2009	12/20/2012
15325	Weyerhaeuser Company, Weyerhaeuser Landfill Disposal Site	Official Site Name	2/11/1997	2/11/1997
15325 001	Weyerhaeuser Company, Landfill	GARD	12/18/1990	
5197	Weyerhaeuser NR Company, Philadelphia Facility	Air-Notification	9/1/2010	
MSR000696	Weyerhaeuser NR Company, Philadelphia Facility	GP-Baseline	3/28/2015	9/28/2015
5197	Dry Side Maintenance Shop	Air-Notification	2/7/2012	
MSP091379	Weyerhaeuser NR Company, Philadelphia Facility	Water - Pretreatment	11/28/2012	10/31/2017
MSD980557375	Weyerhaeuser Company NR	Hazardous Waste-EPA ID	12/20/2012	
192000012	Weyerhaeuser NR Company, Philadelphia Facility	Air-Construction	3/21/2014	

**Basin:** Pearl River Basin

**Location Description:**PG- Plant Entrance (General). Data collected by Mike Hardy on 11/1/2005. Elevation 481 feet. Just inside gate at guard shack.