

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT
AND PREVENTION OF SIGNIFICANT
DETERIORATION (PSD) AUTHORITY**

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Vicksburg Forest Products, LLC – Waltersville Lumber Mill
1725 North Washington Street
Vicksburg, Warren County, Mississippi

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: October 14, 2020

Permit No.: 2780-00004

SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.

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

(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.3 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.4 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.5 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).)
- 1.6 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.7 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

- 1.9 The permittee shall furnish to the Mississippi Department of Environmental Quality (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).)

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards (NAAQS), and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

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

- 1.11 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2).)

- 1.12 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

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

- 1.13 *General Nuisances:* 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.)

- 1.14 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality, Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives, upon presentation of credentials:
- (a) To enter at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

- 1.15 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to, the following:
- (a) Persistent violation of any of the terms or conditions of this permit;
 - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

- 1.16 *Public Record and Confidential Information:* Except for information determined to be confidential under the Mississippi Air and Water Pollution Control Law, all information obtained 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)

1.17 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

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

1.18 *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

1.19 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The MDEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

1.20 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

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

1.21 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

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

1.22 *Application for a Permit to Operate:* 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

1.23 *Operating Under a Permit to Construct:* 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B(2)(a) through (e).
 - (3) Where an upset (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.) occurs during start-up or shutdown, see the upset requirements above.

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

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

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

1.26 *Compliance Testing:* Regarding compliance testing:

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

- (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

SECTION 2. EMISSION POINT DESCRIPTION

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

EMISSION POINT	DESCRIPTION
AA-100	Facility-Wide (Vicksburg Forest Products, LLC – Waltersville Lumber Mill)
AA-001	Pneumatic Wood Waste Handling System [includes one (1) new high-efficiency cyclone and the removal of the existing baghouse and cyclone; planer shavings are pneumatically transferred to a truck bin for off-site shipment]
AA-002	94.8 MMBTU/ hr Wood Waste-Fired Boiler [equipped with a multi-clone; construction commenced in November 1988]
AA-006	Sawmill Operations [includes one (1) new small log line; operations include log debarking, sawing, bark hogging, wood chipping, and grinding]
AA-007	Haul Roads
AA-013	Truck Load-Out Operations [includes the receipt, conveyance, and loading of material collected at the bottom of the Wood Waste Handling System and wood waste generated from Sawmill Operations into trucks for off-site shipment]
AK-001 through AK-028	Twenty-Eight (28) Indirect-Fired, Steam-Heated Batch Lumber Drying Kilns
AK-029	Indirect-Fired, Steam-Heated Dual Path Lumber Drying Kiln
AK-030	Indirect-Fired, Steam-Heated Dual Path Lumber Drying Kiln

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limitation/Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.1	PM (filterable only)	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity	$\leq 40\%$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.3		
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.4	SO ₂	4.8 Pounds / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).	3.5	PM	0.3 Grains / Dry Standard Cubic Feet
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.6	Fuel Source	Combust Uncontaminated Wood Waste
	40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63.7485 and 63.7495(c)(2); Subpart DDDDD	3.7	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued on May 24, 1988, and modified on September 17, 1999	3.8	PM	45.6 Pounds / Hour 199.7 tpy (12-Month Rolling Total)
AK-001 through AK-030	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a) and 63.2233(c); Subpart DDDD	3.9	HAPs	General Applicability
AK-029 AK-030	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limit)	3.10	VOCs (as WPP1)	4.43 Pounds / MBF 363.5 tpy (12-Month Rolling Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limit)	3.11	Lumber Throughput	164,114.0 MBF / Year (12-Month Rolling Total)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limitation/Standard
AK-029 AK-030	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	3.12	Operational Requirement	Good Work Practices

- 3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

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

- 3.2 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing or industrial process, which exceeds forty percent (40%) opacity subject to the exceptions provided below:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 24-hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

- 3.3 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity, equivalent to that provided in Condition 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.4 For Emission Point AA-002, except as otherwise specified or limited herein, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input from the boiler.

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

- 3.5 For Emission Point AA-002, except as otherwise specified or limited herein, the permittee is allowed to emit particulate matter (PM) at a rate up to 0.30 grains per dry standard cubic foot from the boiler.

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

- 3.6 For Emission Point AA-002, the permittee shall only combust uncontaminated wood waste within the boiler. 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).)

- 3.7 For Emission Point AA-002, upon certifying completion of construction, the permittee shall be subject to all applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

The permittee shall comply with all applicable standards and/or limitations in this subpart within three (3) years after becoming a major source of hazardous air pollutants emissions (i.e. certifying completion of construction).

Ref.: 40 CFR 63.7485 and 63.7495(c)(2), Subpart DDDDD)

- 3.8 For Emission Point AA-002, the permittee shall limit the emission of particulate matter (PM) to no more than 45.6 pounds per hour and no more than 199.7 tons per year based on a 12-month rolling total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued on May 24, 1988, and modified on September 17, 1999)

- 3.9 For Emission Points AK-001 through AK-030, upon certifying completion of construction, the permittee shall be subject to all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

For the purpose of this permit, Emission Points AK-001 through AK-030 are only subject to an initial notification requirement.

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

- 3.10 For Emission Points AK-029 and AK-030, the permittee shall limit the emission of volatile organic compounds (VOCs) no more than 4.43 pounds per thousand board feet (MBF) and no more than 363.5 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) – PSD BACT Limit)

- 3.11 For Emission Points AK-029 and AK-030, the permittee shall limit the total throughput of lumber dried in the dual-path kilns to no more than 164,114 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) – PSD BACT Limit)

- 3.12 For Emission Points AK-029 and AK-030, the permittee shall operate the dual-path kilns in accordance with the manufacturer’s recommendations and a “*Good Work Practices Plan*” that shall be developed and implemented no later than one hundred eighty (180) days after issuance of this permit. The plan shall outline a schedule for all actions necessary to conduct (at a minimum) the following inspection and maintenance activities:

- (a) Walk-around inspection;
- (b) Wet bulb proper operation;
- (c) Entrance and exit baffles inspection;
- (d) Grease kiln cart wheels and fan shafts bearings;
- (e) Hydraulic oil levels;
- (f) Calibration of moisture content equipment; and
- (g) Temperature probe calibration.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) – PSD BACT Standard)

SECTION 4. WORK PRACTICE STANDARDS

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

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	40 CFR 52.21(r)(6)(iii); Subpart A	5.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable)	Calculate and Maintain Project-Related Emissions Increases
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	5.3	PM (filterable)	Conduct Performance Stack Testing
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	PM ₁₀ / PM _{2.5} (filterable + condensable)	Establish Unit-Specific Emission Factors
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Steam Production	Calculate and Record Steam Production (Weekly Average and 52-Week Rolling Total)
AK-029 AK-030	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Lumber Throughput	Monitor Total Throughput from Both Kilns
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	VOCs HAPs	Record Inspections / Maintenance Actions in Accordance with Good Work Practices Plan

5.1 For Emission Point AA-100 (Facility-Wide), the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to 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 monitor the respective emission increase of 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 July 24, 2020.

The permittee shall calculate and record the respective pollutant emissions in tons per year (tpy) 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)

- 5.3 For Emission Point AA-002, the permittee shall evaluate the emission of particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable + condensable), and particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$; filterable + condensable) as a result of the proposed construction project by conducting a performance stack test no later than one hundred eighty (180) days after certifying completion of construction in accordance with the following specifications:
- (a) Performance testing shall be conducted in accordance with either applicable EPA-approved test methods (found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, and Appendix A of 40 CFR Part 63), or an alternative test method approved by the MDEQ and/or the EPA prior to the testing event.
 - (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3); Subpart A.
 - (c) The permittee shall conduct a performance stack test at representative operating load conditions. For the purpose of this permit, “*representative load conditions*” is defined as the operation of the boiler under heat input rates that that will be typical in the future. The MDEQ may require the permittee to conduct a subsequent performance stack test if the heat input rate of the boiler increases by more than ten percent (10%) of the average rate established during the previously completed test.
 - (d) The permittee shall monitor and record the total quantity of steam generated during each test run.
 - (e) Any performance stack testing conducted to evaluate PM emissions shall also serve as a compliance demonstration with the PM emission limitation specified in Condition 3.8.

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

- 5.4 For Emission Point AA-002, upon completing a performance stack test required by Condition 5.3, the permittee shall utilize both the test results, steam generation data collected during the testing event, and other applicable data to establish unit-specific factors for PM (filterable), PM_{10} (filterable + condensable), and $\text{PM}_{2.5}$ (filterable + condensable) emissions in pounds of pollutant per thousand pounds of steam output.

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

- 5.5 For Emission Point AA-002, the permittee shall calculate and record the total quantity (in pounds) of steam generated by the boiler based on a weekly average and on a rolling 52-week total.

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

- 5.6 For Emission Points AK-029 and AK-030, the permittee shall monitor the total throughput of dried lumber from both kilns in thousand board feet (MBF) based on both a monthly basis and a 12-month rolling total basis.

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

- 5.7 For Emission Points A-029 and AK-030, the permittee shall perform and record all inspections and maintenance actions on the specified schedule outlined in the Good Work Practices Plan as required by Condition 3.12.

If any problems are noted during an inspection, the permittee shall perform the necessary unscheduled maintenance to ensure the operation of the affected source as originally designed. Additionally, the results from all inspections and any maintenance actions (if necessary) shall be kept on-site for three (3) years and made readily available for review by MDEQ personnel upon request. The records from the remaining two (2) years may be kept off-site and must be available upon request.

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

SECTION 6. REPORTING REQUIREMENTS

6.1 General Reporting Requirements:

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

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

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

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

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

- (c) Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a Responsible Official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete

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

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

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

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

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

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

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

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

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

Specific Reporting Requirements:

Emission Point(s)	Applicable Requirement	Condition Number	Reporting Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.2	Submit a Notification on the Completion of Construction
	40 CFR 52.21(r)(6)(v); Subpart A	6.3	Submit Calculated Annual Emissions
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.4	Submit Operational Data
	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).	6.5	Submit a Written Performance Test Protocol Submit a 10-Day Advance Notification for a Performance Testing Event
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit Performance Test Results
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit Unit-Specific Emission Factors for Review / Approval
	40 CFR 63.7545(a); Subpart DDDDD	6.8	Submit Initial Notifications (As Applicable)
AK-029 AK-030	40 CFR 63.2280(a) and (b), Subpart DDDD	6.9	Submit Initial Notifications (As Applicable)

- 6.2 For Emission Point AA-100 (Facility-Wide), upon the completion of construction / installation of all permitted emission sources and prior to commencing operation, the permittee shall notify the MDEQ in writing that construction / installation has been completed in accordance with the approved plans and specifications on file no later than fifteen (15) days after completing the actual construction / installation.

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

- 6.3 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1st (or February 29th 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 5.2; 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 5.2 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 5.2; and
- (e) Differ from the established pre-construction projected emissions presented in the permit application received on July 24, 2020.

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

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that details the following information:

- (a) The quantity (in pounds) of steam generated by the boiler on a rolling 52-week period;
- (b) The total throughput (in thousand board feet) of lumber dried by the combined dual-path drying kilns on a 12-month rolling total basis;
- (c) Any changes that have been made to the Good Work Practices Plan required by Condition 3.12.

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

- 6.5 For Emission Point AA-002, the permittee shall submit a written protocol for a performance stack test that details the procedures and test methods to be implemented during the actual event no later than thirty (30) days prior to the intended date.

After the first successful submission of a written test protocol in conjunction with the corresponding test results, the permittee may request that the required submission of a testing protocol for subsequent testing be waived by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing. If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the written protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).

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

- 6.6 For Emission Point AA-002, upon conducting a performance test, the permittee shall submit a report in accordance with Condition 1.26 that details the results of a test to the MDEQ no later than sixty (60) days after actual testing event.

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

- 6.7 For Emission Point AA-002, the permittee shall submit the unit-specific emission factors required by Condition 5.4 for review and approval by the MDEQ no later than ninety (90) days after completing the a performance stack test required by Condition 5.3.

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

- 6.8 For Emission Point AA-002, the permittee shall submit to the MDEQ all of the applicable notifications found in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) – (h) by the dates specified.

(Ref.: 40 CFR 63.7545(a); Subpart DDDDD)

- 6.9 For Emission Points AK-029 and AK-030, the permittee shall submit to the MDEQ all of the applicable notifications found in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9 (b) – (e) and (g) and (h) by the dates specified.

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

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