

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


TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Biewer Sawmill Winona, Inc.
625 Sawyer Road
Winona, Montgomery 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



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: April 7, 2021

Permit No.: 1860-00035

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 Department of Environmental Quality (DEQ) 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, 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne 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

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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 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 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 start-ups 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-000	Facility-Wide (Biewer Sawmill Winona, Inc.)
AA-001	Sawmill Operations [fugitive emissions; includes debarking, sawing, chipping, and grinding]
AA-002	Bark Hog
AA-003	Green Wood Chip Screen [separates (by size) woods chips / sawdust received from the Sawmill Operations]
AA-004	Green Wood Chipper [receives and processes oversized wood chips from Green Wood Chip Screen]
AA-005	Continuous Direct-Fired Lumber Drying Kiln No. 1 [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-006	Continuous Direct-Fired Lumber Drying Kiln No. 2 [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-007	Continuous Direct-Fired Lumber Drying Kiln No. 3 [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-008	Planer Mill Operations [includes Planer Mill Block Hog and conveyance of dry shavings to Dry Shavings Bin – all emissions are routed to a cyclofilter (a combination cyclone and baghouse control unit)]
AA-009	Wood Byproduct Handling [fugitive emissions; includes the bulk material conveyance, storage, load-out, and off-site shipping of both green and dry wood byproducts]
AA-010	Paved Haul Roads [fugitive emissions]
AA-011	Above-Ground Storage Tanks [includes one (1) 1,000-gallon gasoline tank and one (1) 10,000-gallon diesel tank]
AA-012	60 HP (45kW) Natural Gas-Fired Emergency Generator Engine [total heat input: 0.84 MMBTU / hour; manufactured after 2016]

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.2	PM (filterable only)	$E = 4.1(p^{0.67})$
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limit)	3.3	PM (filterable)	Operational Requirement (Partial Enclosure)
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limit)	3.4	PM ₁₀ / PM _{2.5} (filterable only)	192,750.0 tpy (Rolling 12-Month Total)
AA-005 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.5	PM (filterable only)	$E = 0.8808(I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limits)	3.6	VOCs (as WPP1)	4.80 Pounds / MBF (for Each Kiln); 840.0 tpy (for Combined Kilns; Rolling 12-Month Total)
		3.7	Dried Lumber Throughput	350.0 MMBF / Year (for Combined Kilns; Rolling 12-Month Total)
		3.8	Final Moisture Content	10.0% or Greater 30-Day Block Average)
		3.9	Maximum Operating Temperature	275.0°F (30-Day Block Average)
40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.10	HAPs	General Applicability	
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limits)	3.11	PM (filterable)	Operational Requirement (Cyclofilter)
		3.12	PM ₁₀ / PM _{2.5} (filterable only)	6,000 Hours / Year Operational Requirement (Rolling 12-Month Total)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limitation/Standard
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.13	Differential Pressure Range	$0.2 \leq P \leq 6.0$ (inches H ₂ O)
AA-011	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	3.14	VOCs	Apply "Light" or "White" Coating, or Install and Maintain a Rooftop Cover
AA-012	11 Miss. Admin. Code Pt. 2, R. 1.3.D.1(a).	3.15	PM (filterable only)	0.6 Pounds Per MMBTU / Hour Heat Input
	40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (b) and 63.6590(c)(7); Subpart ZZZZ	3.16	HAPs	General Applicability
	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iii) and (iv); Subpart JJJJ	3.17	NO _x + HC CO	General Applicability
	40 CFR 60.4237(c); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.18	Monitoring Requirement	Install a Non-Resettable Hour Meter
	40 CFR 60.4233(d) and 60.4234; Subpart JJJJ – Table 1	3.19	NO _x + HC	10 Grams / Horsepower-Hour
			CO	387 Grams / Horsepower-Hour
	40 CFR 60.4243(e); Subpart JJJJ	3.20	Fuel Alternative	Combust Propane for 100 Hours / Calendar Year
	40 CFR 60.4243(d)(1) – (3); Subpart JJJJ	3.21	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations

3.1 For Emission Point AA-000 (Facility-Wide), the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.2 For Emission Point AA-000 (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:

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

Where “*E*” is the emission rate in pounds per hour and “*p*” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.3 For Emission Point AA-001, the permittee shall ensure the structural integrity of the building and the enclosure that contain the referenced emission source equipment is sustained as a partial enclosure.

For the purpose of this permit, “partial enclosure” shall be defined any structure comprised of walls or partitions on at least three sides or three-quarters of the perimeter surrounding process equipment to prevent the entrainment of filterable particulate matter into the air at a minimum of ninety percent (90%) control efficiency.

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

- 3.4 For Emission Points AA-002 and AA-004, the permittee shall limit the total quantity of green wood byproducts (bark, green wood chips / sawdust, etc.) chipped, hogged, and/or grinded to no more than 192,750.0 tons per year based on a rolling 12-month total.

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

- 3.5 For Emission Points AA-005, AA-006, and AA-007, the maximum emission permissible of ash / particulate matter (PM) from fossil fuel-burning installations equal to or greater than 10 million BTU (MMBTU) per hour heat input but less than 10,000 MMBTU per hour heat input shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 \cdot (I^{0.1667})$$

Where “*E*” is the emission rate in pounds per MMBTU per hour heat input and “*I*” is the heat input in millions of BTU per hour.

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

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- 3.6 For Emission Points AA-005, AA-006, and AA-007, the permittee shall limit the emission of volatile organic compounds as determined by “Wood Products Protocol 1” (VOCs as WPP1) from each lumber drying kiln to no more than 4.80 pounds per thousand board feet (MBF). Additionally, VOC emissions from the combined lumber drying kilns shall not exceed 840.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.7 For Emission Points AA-005, AA-006, and AA-007, the permittee shall limit the throughput of dried lumber produced from the combined lumber drying kilns to no more than 350.0 million board feet (MMBF) [or 350,000.0 thousand board feet (MBF)] per year based on a rolling 12-month total.

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

- 3.8 For Emission Points AA-005, AA-006, and AA-007, the permittee shall limit the final moisture content of dried lumber produced within each lumber drying kiln to 10% or greater based on each 30-day block average.

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

- 3.9 For Emission Points AA-005, AA-006, and AA-007, the permittee shall limit the maximum operating temperature of each lumber drying kiln to no more than 275.0 degrees Fahrenheit (°F) based on each 30-day block average.

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

- 3.10 For Emission Points AA-005, AA-006, and AA-007, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

For the purpose of this permit, Emission Points AA-005, AA-006, and AA-007 are only subject to an initial notification requirement. As this requirement was satisfied with the submission of this application for a Permit to Construct Air Emissions Equipment, no further requirements apply under Subpart DDDD.

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

- 3.11 For Emission Point AA-008, the permittee shall not conduct active planer mill operations without simultaneously operating the cyclofilter. If the event the cyclofilter malfunctions or becomes non-operational, the permittee shall cease operations at the planer mill until the cyclofilter is returned to service.

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

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- 3.12 For Emission Point AA-008, the permittee shall limit active planer mill operations to no more than 6,000 hours per year based on a rolling 12-month total.

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

- 3.13 For Emission Point AA-008, the permittee shall operate the cyclofilter in such a manner as to maintain a differential pressure drop (ΔP) that is greater than / equal to 0.2 inches of water (in. H₂O) and less than / equal to 6.0 in. H₂O (i.e. $0.2 \leq \Delta P \leq 6.0$) during active planer mill operations.

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

- 3.14 For Emission Point AA-011, the permittee shall implement one (1) of the following practices in order to minimize the emission of volatile organic compounds from the applicable storage tanks:

(a) Only apply a surface coating to the storage tanks with a coloring either described as “light” or “white”; or

(b) Install and maintain a rooftop cover for each storage tank.

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

- 3.15 For Emission Point AA-012, the maximum permissible emission of ash and/or particulate matter (PM – filterable only) shall not exceed 0.6 pounds per million BTU (MMBTU) per hour heat input.

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

- 3.16 For Emission Point AA-012, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Stationary RICE is “new” if construction or reconstruction commenced on or after June 12, 2006.

For stationary RICE that are new, the permittee shall comply with Subpart ZZZZ by complying the requirements found in 40 CFR Part 60, Subpart JJJJ. No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a), (b) and 63.6590(c)(7); Subpart ZZZZ)

- 3.17 For Emission Point AA-012, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

For the purpose of this permit, Emission Point AA-012 is considered a four-stroke, lean burn internal combustion engine with a cylinder displacement of less than 10 liters.

(Ref.: 40 CFR 60.4230(a)(4)(iv); Subpart JJJJ)

- 3.18 For Emission Point AA-012, the permittee shall install a non-resettable hour on the engine regardless of whether the permittee is required to do so by a Federal regulation.

(Ref.: 40 CFR 60.4237(c); Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

- 3.19 For Emission Point AA-012, the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

- (a) Nitrogen Oxides + Hydrocarbons (NO_x + HC): 10 grams per horsepower-hour; and
- (b) Carbon Monoxide (CO): 387 grams per horsepower-hour.

The permittee shall operate and maintain the engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4233(d) and 40 CFR 60.4234, Subpart JJJJ – Table 1)

- 3.20 For Emission Point AA-012, the permittee may operate the engine using propane as an alternative fuel for a maximum of one hundred (100) hours per calendar year only during emergency operations.

(Ref.: 40 CFR 60.4243(e), Subpart JJJJ)

- 3.21 For Emission Point AA-012, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with Parts (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. 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 60.4243(d)(1) – (3), Subpart JJJJ)

SECTION 4. WORK PRACTICES

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-000	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	Opacity PM / PM ₁₀ / PM _{2.5}	Perform a Weekly Visible Emissions Observation
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	PM / PM ₁₀ / PM _{2.5}	Monitor the Quantity of Green Wood Byproducts Processed (Monthly; Rolling 12-Month Total)
AA-005 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	Dried Lumber Throughput VOCs	Monitor the Total Throughput and Total Emissions from the Combined Kilns (Monthly and 12-Month Rolling Total)
		5.5	Final Moisture Content	Continuously Monitor the Moisture Content of Dried Lumber Processed through the Planer Mill (Daily) Determine the Average Moisture Content (Monthly Average)
		5.6	Operating Temperature	Continuously Monitor the Operating Temperature (Daily) Determine the Average Operating Temperature (Monthly Average)
		5.7	VOCs HAPs	Develop, Maintain, and Implement a Maintenance and Inspection Plan for Kilns
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	Opacity PM / PM ₁₀ / PM _{2.5}	Conduct Monthly Visible Emission Evaluations (VEE)
		5.9	Hours of Operation	Monitor Hours of Active Planer Mill Operations (Monthly; Rolling 12-Month Total)
		5.10	PM / PM ₁₀ / PM _{2.5}	Monitor Differential Pressure Drop Daily
		5.11		Conduct a Weekly Inspection of the Cyclofilter
AA-011	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.12	VOCs	Conduct Compliance Demonstration Measures (As Applicable)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-012	40 CFR 60.4243(b)(1); Subpart JJJJ	5.13	NO _x + HC CO	Conduct Compliance Demonstration Measures (As Applicable)
	40 CFR 60.4245(b); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.14		Record Hours of Operation (Emergency and Non-Emergency)
	40 CFR 60.4243(e); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.15	Alternative Fuel Usage	Monitor Hours of Operation While Combusting Propane Gas

5.1 For Emission Point AA-000 (Facility-Wide), the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

5.2 For Emission Point AA-001, the permittee shall perform a weekly visible emissions observation in accordance with EPA Test Method 22 on the ambient air outside each enclosure for the merchandiser and the sawing process during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, the permittee shall determine the cause of the visible emissions and implement the necessary corrective actions to prevent further emissions.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective actions taken to prevent emissions, and the date / time when visual emission observations were conducted. Additionally, the permittee shall maintain all documentation that details any maintenance actions (preventative, corrective, etc.) performed on an enclosure to maintain the applicable control efficiency.

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

5.3 For Emission Points AA-002 and AA-004, the permittee shall monitor and record both the total quantity (in tons) of green wood byproducts hogged, chipped, and/or grinded both on a monthly basis and a rolling 12-month total basis.

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

- 5.4 For Emission Points AA-005, AA-006, and AA-007, the permittee shall record and maintain the total throughput of dried lumber produced from the combined lumber drying kilns in thousand board feet (MBF) on both a monthly and a 12-month rolling total basis.

Additionally, the permittee shall utilize the throughput data and the emission factor specified in Condition 3.6 to calculate and record the total emission of volatile organic compounds (VOCs) from the combined kilns both a monthly and a 12-month rolling total basis.

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

- 5.5 For Emission Points AA-005, AA-006, and AAA-007, the permittee shall demonstrate compliance with moisture content limitation specified in Condition 3.8 by continuously monitoring and maintaining the moisture of dried lumber processed in the planer mill on a daily basis. This monitoring data shall be utilized to determine the moisture content based on a monthly average.

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

- 5.6 For Emission Points AA-005, AA-006, and AA-007, the permittee shall demonstrate compliance with the maximum operating temperature limitation specified in Condition 3.9 by continuously monitoring and maintaining the operating temperature of each kiln on a daily basis. This monitoring data shall be utilized to determine the operating temperature of each kiln based on a monthly average.

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

- 5.7 For Emission Points AA-005, AA-006 and AA-007, the permittee shall develop, implement, and maintain a Maintenance and Inspection Plan that establishes work practice standards in accordance with the manufacturer's specifications for continuous direct-fired kiln operations. The plan shall establish a routine for conducting preventative maintenance on the kilns that includes the following actions (at a minimum):

- (a) Conducting walk-around inspections;
- (b) Confirming proper wet-bulb operation;
- (c) Conducting entrance / exit baffle and damper inspections;
- (d) Checking wet-bulb wicks for integrity;
- (e) Greasing the kiln cart wheels and fan shaft bearings;
- (f) Conducting circulation, exhaust, and combustion air fan inspections;

- (g) Checking hydraulic oil levels;
- (h) Calibrating moisture content equipment (as applicable);
- (i) Calibrating temperature probe equipment;
- (j) Conducting burner clean-outs and tune-ups;
- (k) Checking for leaks in kiln pipe-work; and
- (l) Checking shaft seals at wall penetrations (as applicable)

All inspections and maintenance actions shall be conducted on the specified schedule as required by the plan. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance to ensure operation of a kiln as originally designed.

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

5.8 For Emission Point AA-008, the permittee shall perform monthly visible emission evaluation (VEE) in accordance with EPA Test Method 9 (i.e. "Method 9") on the exhaust from the cyclofilter. In addition to the provisions outlined in Method 9, the permittee shall adhere to the following specifications:

- (a) An evaluation shall be conducted during daylight hours and during conditions representative of normal operation for the planer mill;
- (b) In the event that a VEE is not conducted during any calendar month, the permittee shall denote and maintain an explanation as to why the VEE was not performed;
- (c) If the result of a VEE indicates non-compliance with the opacity limit referenced in Condition 3.1, the permittee shall immediately determine the cause for the exceedance and perform the necessary corrective actions to minimize emissions; and
- (d) The permittee shall maintain applicable documentation pertaining to a VEE and any corrective actions taken to prevent or minimize emissions.

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

5.9 For Emission Point AA-008, the permittee shall monitor and record the total hours of active planer mill operations on both a monthly basis and a rolling 12-month total basis.

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

5.10 For Emission Point AA-008, the permittee shall monitor and record the differential pressure drop on the cyclofilter daily during active planer mill operations. If any daily

recording is outside the differential pressure drop range referenced in Condition 3.13, the permittee shall perform necessary maintenance to return the cyclofilter to its indicated pressure drop range / normal operation.

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

- 5.11 For Emission Point AA-008, the permittee shall conduct a weekly inspection on the major components related to the cyclofilter. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of the cyclofilter as originally designed. Additionally, the permittee shall also maintain sufficient equipment on-site as is necessary to repair the cyclofilter.

The permittee shall maintain documentation that details the date / time each inspection performed, any noted problem experienced, and any maintenance (either corrective or preventative) performed to return the cyclofilter to operation as originally designed.

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

- 5.12 For Emission Point AA-011, the permittee shall demonstrate compliance with the Best Available Control Technology (BACT) standards specified in Condition 3.14 in accordance with the following requirements (as applicable):

- (a) Maintain applicable documentation that indicates the surface coating on each storage tank complies with the specified color requirement;
- (b) Perform and record a visible structural integrity inspection of each rooftop cover on an annual basis and no later than thirteen (13) months after the previously completed inspection (denote the results and any maintenance actions taken as a result of the inspection).

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

- 5.13 For Emission AA-012, the permittee shall demonstrate compliance with the following specifications if the engine is EPA-certified:

- (a) Confirm the purchase of a spark-ignition internal combustion engine certified to the referenced emission standards and maintain such documentation.
- (b) If the permittee operates and maintains the engine according to the manufacturer's emission-related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee must also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as they apply). If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out-of-compliance.

- (c) If the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. As such, the permittee must keep a maintenance plan, retain records of conducted maintenance to demonstrate compliance, and maintain / operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to a practicable extent). However, the permittee is not required to conduct performance testing on the engine.

(Ref.: 40 CFR 60.4243(b)(1); Subpart JJJJ)

- 5.14 For Emission Point AA-012, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail what classified each occurrence as either an emergency or a non-emergency.

(40 CFR 60.4245(b); Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

- 5.15 For Emission Point AA-012, the permittee shall monitor and record the duration (in hours) spent operating the engine with propane as a fuel source on a monthly basis. Additionally, the permittee shall maintain documentation that details the circumstance(s) for the use of propane as a fuel source (in lieu of natural gas).

If propane is used for more than one hundred (100) hours in a calendar year for an engine that is not certified to the emission standards specified in Condition 3.19 when using propane gas, the permittee shall conduct a performance test in accordance with 40 CFR 60.4233, Subpart JJJJ to demonstrate compliance with the note emission standards.

(Ref.: 40 CFR 60.4243(e); Subpart JJJJ and 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. The report shall be made within five (5) working days of the time the deviation began.

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

- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year 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 no later than fifteen (15) days after completing construction / installation.

(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-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.2	Submit a Notification on the Initial Start-Up on Operations
		6.3	Submit Semi-Annual Monitoring Report (SMR) on Operational Data
AA-005 AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.4	Submit Maintenance and Inspection Plan for Kilns
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.5	Submit Semi-Annual Summary of Visible Emission Evaluation (VEE) Information
AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.6	Submit Annual Summary on Hours of Operation (Non-Emergency and Emergency

- 6.2 For Emission Point AA-000 (Facility-Wide), the permittee shall notify the MDEQ in writing on the initial start-up of on-site operations no later than fifteen (15) days after the actual date.

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

- 6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that details the following information:

- (a) Any revision(s) made to the Maintenance and Inspection Plan for the continuous direct-fired kilns;

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- (b) Any maintenance actions performed on the applicable enclosures in order to maintain the control efficiencies specified in Condition 3.3;
- (c) The total combined quantity (in tons) of green wood byproducts hogged, chipped, and/or grinded in the Bark Hog (Emission Point AA-002) and the Green Wood Chipper (Emission Point AA-004) on a rolling 12-month total;
- (d) The average operating temperature of each kiln during each month;
- (e) The average moisture content of all dried lumber processed during each month;
- (f) The total dried lumber throughput produced from the combined kilns in thousand board feet (MBF) on a rolling 12-month total;
- (g) Any occurrence (and the corresponding duration) of the cyclofilter malfunctioning and/or becoming non-operational during active planer mill operations and any maintenance actions performed to restore the cyclofilter to its normal manner of operation; and
- (h) A summary of all differential pressure drop range deviations and any corrective actions performed to return the cyclofilter to the specified range; and
- (i) The total hours of active planer mill operations based on rolling 12-month total.

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

- 6.4 For Emission Points AA-005, AA-006, and AA-007, the permittee shall submit the initial Maintenance and Inspection Plan required by Condition 5.7 to the MDEQ no later than sixty (60) days after certifying construction as complete.

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

- 6.5 For Emission Point AA-008, the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that outlines the following information:

- (a) Any occurrence when a VEE was not conducted and an explanation as to why it was not performed;
- (b) Any occurrence when the result of a VEE indicates non-compliance with the referenced opacity limit and the determined cause of the exceedance; and
- (c) Any corrective actions taken to minimize emissions as a result of an exceedance.

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

- 6.6 For Emission Point AA-012, the permittee shall submit a summary within the semi-annual monitoring report (SMR) postmarked by January 31 that details the hours of operation for the engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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