

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Weyerhaeuser NR Company, McComb Wood Products  
2056 Jesse Hall Industrial Parkway  
Magnolia, Pike County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Permit Issued: June 4, 2025**

**Effective Date: As Specified Herein.**

**Expires: May 31, 2030**

**Permit No.: 2280-00050**

## **TABLE OF CONTENTS**

SECTION 1. GENERAL CONDITIONS .....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES .....	13
SECTION 3. EMISSION LIMITATIONS & STANDARDS.....	14
SECTION 4. COMPLIANCE SCHEDULE.....	25
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS .....	26
SECTION 6. ALTERNATIVE OPERATING SCENARIOS.....	32
SECTION 7. TITLE VI REQUIREMENTS .....	33

### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

### **APPENDIX B KILN MAINTENANCE AND INSPECTION PLAN**

## SECTION 1. GENERAL CONDITIONS

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

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

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

1.3 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

1.4 Prior to its expiration, this permit may be reopened in accordance with the following provisions:

(a) This permit shall be reopened and revised under any of the following circumstances:

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

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

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the “Commission”). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) A portion of the fee shall be based on the permittee’s annual quantity of emissions. The permittee shall elect for “actual emissions” or “allowable emissions” to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions.
  - (i) “Actual emissions” shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct

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

- (ii) “Allowable emissions” are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.
- (iii) Notwithstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

- (b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

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

- (c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., “allowable emissions” or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

- (d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation.

If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

- (e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

- (f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

- (g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

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

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ (or an authorized representative), upon the presentation of credentials and other documents as may be required by law, to perform the following:

- (a) Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy (at reasonable times) any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor (at reasonable times) substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance upon satisfying one of the following conditions:

- (a) Such applicable requirements are included and are specifically identified in the permit; or
- (b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

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

- 1.15 Nothing in this permit shall alter or affect the following:

- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

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

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

- (a) The changes are not modifications under any provision of Title I of the Federal Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [i.e., at least seven (7) days or such other time frame as provided in other regulations for emergencies] and the notification includes the following information:
  - (1) A brief description of the change(s),
  - (2) The date on which the change will occur,
  - (3) Any change in emissions, and

(4) Any permit term or condition that is no longer applicable as a result of the change;

(d) The permit shield shall not apply to any Section 502(b)(10) change.

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

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an “Air Pollution Emergency Episode”, the permittee will be required to operate in accordance with either the permittee's prepared “Emission Control Action Program(s)” or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and “Emission Reduction Objectives” specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared and the permittee’s source of air contamination.

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

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

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the “Federal Energy Supply and Environmental Coordination Act of 1974” (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the “Federal Power Act”;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
  - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or

- (2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. or Ch. 5.; or
- (f) Any change in ownership of the stationary source.

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

1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:

- (a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.
- (b) A permit transfer shall be approved upon satisfaction of the following:
  - (1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and
  - (2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

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

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

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for

forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance.

Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; and must meet the following buffer zones:

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

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following 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 non-compliance, 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 start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Regulation 11 Mississippi Administrative Code, 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 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the “Upset” requirements above.

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

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

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

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide [Weyerhaeuser NR Company, McComb Wood Products]
AA-001	Green Lumber Sawmill Area [includes the following operations: debarking; bucking; sawing, edging; the load-out of the chip bin, sawdust bins, and bark]
AA-002	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-003	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-004	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-005	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-006	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-007	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-008	Planer Mill [includes two (2) cyclones used in series to convey wood materials generated through the planning operations to a shaving storage area for either truck load-out or placement in a hogger – each cyclone possesses a pneumatic dust transport system to minimize dust emissions]
AA-010	Wood Fuel Silo [includes a cyclone for conveyance of planer shavings and hogger blocks for usage as fuel in the lumber drying kilns – the cyclone possesses a pneumatic dust transport system to minimize dust emissions]
AA-011	Direct-Fired Lumber Batch Drying Kiln [includes 20 MMBTU / hour wood residue-fired burners and a 1 MMBTU / hour propane-fired igniter]
AA-012	250 HP (186 kW) Compression Ignition (CI) Emergency Fire Water Pump Engine [max. heat input: 1.75 MMBTU / hour; manufactured in 1984]
AA-014	84.42 HP (63 kW) CI Emergency Fire Water Pump Engine [max. heat input: 0.59 MMBTU / hour; manufactured in 2021]

### **SECTION 3. EMISSION LIMITATIONS & STANDARDS**

#### **A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS**

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided below:

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

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 The permittee shall not cause 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 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.)

**B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter</b>	<b>Limit / Standard</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.B.1	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-011	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products  40 CFR 63.2231(a) and (b); Subpart DDDD	3.B.2	HAP	General Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000 and modified November 16, 2015  <b>(PSD BACT Limits)</b>	3.B.3	PM (filterable) PM <sub>10</sub> (filterable + condensable)	0.61 lb. / MBF (Each Kiln; Each Pollutant) 92.1 tpy (for All Kilns Combined; Rolling 12-Month Total)
			NO <sub>x</sub>	0.62 lb. / MBF (Each Kiln) 93.6 tpy (for All Kilns Combined; Rolling 12-Month Total)
			CO	2.80 lb. / MBF (Each Kiln) 422.8 tpy (for All Kilns Combined; Rolling 12-Month Total)
			VOC (as WPP1)	5.35 lb. / MBF (Each Kiln) 807.9 tpy (for All Kilns Combined; Rolling 12-Month Total)
11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015  <b>(PSD BACT Limit)</b>	3.B.4	Lumber Throughput	302,000.0 MBF / Year (for All Kilns Combined; Rolling 12-Month Total)	
AA-008 AA-010	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Title V Operating Permit issued April 18, 2012	3.B.5	PM / PM <sub>10</sub> (filterable only)	Operational Requirement (Cyclones)
AA-008	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015  <b>(PSD BACT Limits)</b>	3.B.6	PM / PM <sub>10</sub> (filterable only)	0.03 lb. / MBF 4.53 tpy (Rolling 365-Day Total)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-008	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 <b>(PSD BACT Limit)</b>	3.B.7	Lumber Throughput	302,000.0 MBF / Year (Rolling 365-Day Total)
AA-010	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and last modified November 16, 2015 <b>(PSD BACT Limits)</b>	3.B.8	PM / PM <sub>10</sub> (filterable only)	0.024 lb. / MBF 3.62 tpy
AA-012 AA-014	11 Miss. Admin. Code Pt, 2, R. 1.3.D(1)(a).	3.B.9	PM (filterable)	0.6 lb. / MMBTU
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), (2)(ii), and (c)(6); Subpart ZZZZ	3.B.10	HAPs	General Applicability
	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ 40 CFR 60.4211(f)(1) – (3); Subpart III	3.B.11	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
AA-014	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(ii); Subpart III	3.B.12	NMHC + NO <sub>x</sub> CO PM	General Applicability
	40 CFR 60.4205(c), 60.4206, 60.4211(c), and Table 4; Subpart III	3.B.13	NMHC + NO <sub>x</sub>	4.7 g. / kW-hr (or 3.5 g. / HP-hour)
			CO	5.0 g. / kW-hr (or 3.7 g. / HP-hour)
PM (filterable)	0.40 g. / kW-hr (or 0.30 g. / HP-hour)			
AA-014	40 CFR 60.4207(b); Subpart III	3.B.14	Fuel Requirements	15 ppm Sulfur Content (Max.); <b>AND</b> 40 Cetane Index (Min.) <b>OR</b> 35% Aromatic Content (Max. – by vol.)

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified 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 that includes any

associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

where “E” is the emission rate in pounds (lb.) 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.)

- 3.B.2 For Emission Points AA-002 through AA-007 and AA-011, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 10 of Subpart DDDD).

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

- 3.B.3 For Emission Points AA-002 through AA-007 and AA-011, the permittee shall comply with the following emission limits:

- (a) Particulate matter (PM; filterable): no more than 0.61 pounds (lb.) per thousand board feet (MBF) dried from **each** lumber kiln and no more than 92.1 tons per year (tpy) from **all** lumber kilns combined based on a rolling 12-month total basis;
- (b) PM less than 10 microns ( $\mu\text{m}$ ) in diameter ( $\text{PM}_{10}$ ; filterable + condensable): no more than 0.61 lb. / MBF dried from **each** lumber kiln and no more than 92.1 tpy from **all** lumber kilns combined based on a rolling 12-month total basis;
- (c) Nitrogen oxides ( $\text{NO}_x$ ): no more than 0.62 lb. / MBF dried from **each** lumber kiln and no more than 93.6 tpy from **all** lumber kilns combined based on a rolling 12-month total basis;
- (d) Carbon monoxide (CO): no more than 2.80 lb. / MBF dried from **each** lumber kiln and no more than 422.8 tpy from **all** lumber kilns combined based on a rolling 12-month total basis; and
- (e) Volatile organic compounds (VOCs) as determined by Wood Products Protocol 1 (WPP1): no more than 5.35 lb. / MBF dried from **each** lumber kiln and no more than 807.9 tpy from **all** lumber kilns combined based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 – PSD BACT Limits)

- 3.B.4 For Emission Points AA-002 through AA-007 and AA-011, the permittee shall limit the throughput of dried lumber produced from the combined lumber drying kilns to no more than 302.0 million board feet (MMBF) [or 302,000.0 thousand board feet (MBF)] per year based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 – PSD BACT Limit)

- 3.B.5 For Emission Points AA-008 and AA-010, the permittee shall not operate the respective process equipment without simultaneously operating the corresponding cyclone(s). During any period in which a cyclone has failed and/or malfunctioned, the permittee shall cease operation of all associated process equipment until such time that repairs are made and the cyclone (or cyclones) is functioning at the designed removal efficiency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Title V Operating Permit issued April 18, 2012)

- 3.B.6 For Emission Point AA-008, the permittee shall comply with the following emission limits:

- (a) PM: no more than 0.03 lb. / MBF dried and 4.53 tpy based on a rolling 365-day total basis; and
- (b) PM<sub>10</sub> (filterable only): no more than 0.03 lb. / MBF dried and 4.53 tpy based on a rolling 365-day total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 – PSD BACT Limits)

- 3.B.7 For Emission Point AA-008, the permittee shall limit the throughput of dried lumber in the planer mill to no more than 302.0 MMBF per year based on a rolling 365-day total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 –PSD BACT Limit)

- 3.B.8 For Emission Point AA-010, the permittee shall comply with the following emission limits:

- (a) PM (filterable): no more than 0.024 lb. / MBF dried and 3.62 tpy; and
- (b) PM<sub>10</sub> (filterable only): no more than 0.024 lb. / MBF dried and 3.62 tpy.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued December 28, 2000, and modified November 16, 2015 – PSD BACT Limits)

- 3.B.9 For Emission Points AA-012 and AA-014, the maximum permissible emission of ash and/or PM from any fossil fuel burning installation with a heat input of less than ten (10) MMBTU per hour shall not exceed 0.6 pounds per MMBTU heat input.

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

- 3.B.10 For Emission Points AA-012 and AA-014, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 of Subpart ZZZZ).

For purposes of this permit, Emission Point AA-012 is considered an “existing” emergency, compression ignition (CI) stationary RICE as construction commenced before June 12, 2006. This engine shall comply with all applicable requirements of Subpart ZZZZ.

For purposes of this permit, Emission Point AA-014 is considered a “new” emergency, CI stationary RICE as construction commenced after June 12, 2006. As such, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements found in 40 CFR Part 60, Subpart IIII. No further requirements apply for such an engine under Subpart ZZZZ.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), (2)(ii), and (c)(6); Subpart ZZZZ)

- 3.B.11 For Emission Points AA-012 and AA-014, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for more than fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no limit on the use of the engine during an emergency situation.
- (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 63.6640(f)(1) – (3); Subpart ZZZZ)

(Ref.: 40 CFR 60.4211(f)(1) – (3); Subpart IIII)

- 3.B.12 For Emission Point AA-014, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart IIII).

(Ref.: 40 CFR 60.4200(a)(2)(ii); Subpart IIII)

- 3.B.13 For Emission Point AA-014, the permittee shall purchase an engine certified to the following emission standards:

- (a) Non-Methane Hydrocarbons (NMHC) + NO<sub>x</sub>: 4.7 grams per kilowatt-hour (g. / kW-hour) (or 3.5 grams per horsepower-hour [g. / HP-hour]);
- (b) CO: 5.0 g. / kW-hr (or 3.7 g. / HP-hour); and
- (c) PM: 0.4 g. / kW-hr (or 0.3 g. / HP-hr).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, 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 60.4205(c), 60.4206, 60.4211(c) and Table 4; Subpart IIII)

- 3.B.14 For Emission Point AA-014, the permittee shall only combust diesel fuel within the engine that meets the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm), AND
- (b) A minimum cetane index of forty (40) OR a maximum aromatic content of thirty-five (35) volume percent.

(Ref.: 40 CFR 60.4207(b); Subpart IIII)

C. **INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS**

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

3.C.1 The maximum permissible emission of ash and/or PM from any fossil fuel burning installation with a heat input rate less than ten (10) MMBTU per hour shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

**D. WORK PRACTICE STANDARDS**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-012	40 CFR 63.6602, 63.6625(i) and Table 2c (Item 1); Subpart ZZZZ	3.D.1	HAPs	Maintenance Requirements
	40 CFR 63.6605(b); Subpart ZZZZ	3.D.2		General Duty Clause
	40 CFR 63.6625(e)(2), 63.6640(a), and Table 6 (Item 9); Subpart ZZZZ	3.D.3		Perform Work Practices
AA-014	40 CFR 60.4211(a); Subpart IIII	3.D.4	NMHC + NO <sub>x</sub>	Perform Work Practices
	40 CFR 60.4211(g)(1); Subpart IIII	3.D.5	CO PM	Compliance Requirements (As Applicable)

3.D.1 For Emission Point AA-012, the permittee must comply with the following requirements:

- (a) Change the oil and filter every five hundred (500) hours of operation or annually (whichever comes first).

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

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

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

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

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

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

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

- 3.D.2 For Emission Point AA-012, the permittee shall at all times operate and maintain the engine (including associated air pollution control and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

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

- 3.D.3 For Emission Point AA-012, the permittee shall adhere to the following work practices:
- (a) Operate and maintain an engine and control device (if any) in accordance with the manufacturer's emission-related written instructions; or

- (b) Develop a maintenance plan that must outline the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

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

3.D.4 For Emission Point AA-014, the permittee shall comply with the following practices to maintain compliance with the emission standards specified in Condition 3.B.13:

- (a) Operate and maintain each engine and control device (if any) in accordance with the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).

(Ref.: 40 CFR 60.4211(a); Subpart III)

3.D.5 For Emission Point AA-014, the permittee shall demonstrate compliance with the emission standards specified in Conditions 3.B.13 through the following actions **if** the permittee does not operate or maintain the engine in accordance with the manufacturer's emission-related written instructions or changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan;
- (b) Maintain records of conducted maintenance; and
- (c) Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to the extent practicable).
- (d) The permittee shall conduct an initial performance test in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart III (as applicable) to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines:
  - (1) Within one (1) year of start-up;
  - (2) Within one (1) year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions; or
  - (3) Within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g)(1); Subpart III)

## **SECTION 4. COMPLIANCE SCHEDULE**

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

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

## **SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

### **A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 6, Rule 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e. April 30, July 31, October 31, and January 31) and any required annual reports shall be submitted by January 31 following each calendar year.

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

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

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

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

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

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

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

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

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

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

**B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant / Parameter Monitored</b>	<b>Monitoring / Recordkeeping Requirement</b>
AA-002 AA-003 AA-004 AA-005 AA-006 AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	Dried Lumber Throughput	Monitor the Total Throughput (Monthly and Rolling 12-Month Total)
AA-002 through AA-006 AA-008 AA-010 AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	PM PM <sub>10</sub> NO <sub>x</sub> CO VOCs	Implement and Maintain the Maintenance and Inspection Plan
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	Dried Lumber Throughput	Monitor the Total Throughput (Daily and Rolling 365-Day Total)
AA-012	40 CFR 63.6655(a)(1), (2), (5), (d), and (e)(2); Subpart ZZZZ	5.B.4	HAPs	Recordkeeping Requirements
AA-012 AA-014	40 CFR 60.4214(b); Subpart IIII 40 CFR 63.6655(f)(1); Subpart ZZZZ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.5	Emergency Engine Status	Monitor Hours of Operation Monthly (Emergency and Non-Emergency)

5.B.1 For Emission Points AA-002 through AA-006 and AA-011, the permittee shall monitor and record the total throughput of dried lumber from all lumber kilns combined in thousand board feet (MBF) on both a weekly and a rolling 52-week total basis.

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

5.B.2 For Emission Points AA-002 through AA-006, AA-008, AA-010, and AA-011, the permittee shall implement and maintain the respective work practices, inspections, and maintenance actions outlined in the “Maintenance and Inspection Plan” (MIP) (dated September 5, 2018) to minimize the respective emission of PM (filterable), PM<sub>10</sub> (filterable only), NO<sub>x</sub>, CO, and VOCs for the lumber drying kilns, the planer mill, and the wood fuel silo.

As necessary, the permittee shall revise the MIP to address changes in an applicable operation and/or incorporate additional work practices.

Additionally, the permittee shall maintain the results of each inspection and maintenance action (corrective or preventative) completed in accordance with (or as a result of) the MIP.

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

- 5.B.3 For Emission Point AA-008, the permittee shall monitor and record the total throughput of dried lumber in the planer mill in MBF on both a daily basis and a rolling 365-day total basis.

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

- 5.B.4 For Emission Point AA-012, the permittee shall maintain documentation that details the following information:

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

(Ref.: 40 CFR 63.6655(a)(1), (2), (5), (d), and (e)(2); Subpart ZZZZ)

- 5.B.5 For Emission Points AA-012 and AA-014, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an “emergency” or a “non-emergency” service that are recorded by the hour meter on a calendar year basis. The permittee shall record the time of operation and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4214(b); Subpart IIII and 63.6655(f)(1); Subpart ZZZZ)

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

**C. SPECIFIC REPORTING REQUIREMENTS**

<b>Emission Point(s)</b>	<b>Applicable Requirement</b>	<b>Condition Number</b>	<b>Pollutant/Parameter Monitored</b>	<b>Reporting Requirement</b>
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.1	PM PM <sub>10</sub> NO <sub>x</sub> CO VOCs Dried Lumber Throughput	Submit a Semi-Annual Monitoring Report
AA-012 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11)..	5.C.2	Emergency Engine Status	Report Hours of Operation Monthly (Emergency and Non-Emergency)

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information (as applicable):

- (a) For Emission Points AA-002 through AA-007 and AA-011, the report shall include:
  - (1) The total throughput of dried lumber from all kilns combined in thousand board feet (MBF) on both a monthly and rolling 12-month total basis; and
  - (2) A summary of revisions made to the MIP during the reporting period and a copy of the updated MIP.
- (b) For Emission Point AA-008 - the total throughput of dried lumber in the planer mill in MBF on a rolling 365-day total basis for each day during the reporting period;
- (c) For Emission Points AA-008 and AA-010 the report shall include:
  - (1) A summary of revisions made to the MIP during the reporting period and a copy of the updated MIP; and
  - (2) A summary of any maintenance conducted on the cyclones and if there was any period (in hours) when the cyclones malfunctioned.

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

5.C.2 For Emission Points AA-012 and AA-014, the permittee shall submit the following information with the SMR (as specified in Condition 5.C.1) that is due no later than January 31 of each calendar year:

- (a) The hours each engine operated during an emergency situation and what classified the operation as emergency; and
- (b) The hours each engine operated in a non-emergency situation and the reason for the non-emergency operation.

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

**SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

## APPENDIX A

### List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMVOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
PM <sub>2.5</sub>	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound

**Appendix B**  
**Kiln Maintenance and Inspection Plan**