

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

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

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

Permit Issued: August 25, 2025

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Becky Simonson

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: July 31, 2030

Permit No.: 2780-00004

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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) Reopenings 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-100	Facility-Wide (Vicksburg Forest Products, LLC – Waltersville Lumber Mill)
AA-001	Pneumatic Wood Waste Handling System [includes one (1) high-efficiency cyclone; planer shavings are pneumatically transferred to a truck bin for off-site shipment]
AA-002	94.8 MMBTU/Hour Wood Waste-Fired Boiler [equipped with a multi-clone; construction commenced in November 1988]
AA-004	Temporary Boilers [limited to a maximum of two (2) units for use only during shutdown periods of the 94.8 MMBTU/Hour Wood Waste-Fired Boiler; maximum heat input capacity (by fuel): natural gas – 65.0 MMBTU/hour, No. 2 fuel oil – 48.72 MMBTU/hour]
AA-006	Sawmill Operations [includes one (1) small log line; operations include log debarking, sawing, bark hogging, wood chipping, and grinding]
AA-007	Haul Roads [<i>fugitive</i>]
AA-010	Miscellaneous Coating Operations [includes (but not limited to) logo painting and grade stamping]
AA-013	Truck Load-Out Operations [includes the receipt, conveyance, and loading of wood waste generated from Sawmill Operations into trucks for off-site shipment]
AA-014	Air Curtain Incinerator (ACI) [used to dispose of clean lumber waste, wood waste, and yard waste generated on-site with a maximum charge rate of 13 tons/hour]
AK-001 through AK-028	Twenty-Eight (28) Indirect-Fired, Steam-Heated Batch Lumber Drying Kilns
AK-029	Indirect-Fired, Steam-Heated Dual Path Lumber Drying Kiln
AK-030	Indirect-Fired, Steam-Heated Dual Path Lumber Drying Kiln

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

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

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

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

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

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

3.A.3 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 Regulation 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

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.B.1	PM (filterable)	$E = 4.1(p^{0.67})$
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).	3.B.2	PM	0.3 grains/dscf
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 4, 2023	3.B.3	Fuel Source Restriction	Only Combust Uncontaminated Wood Waste (As Applicable)
	40 CFR Part 63, Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63.7485, 63.7490(d), 63.7495(c)(2), and 63.7499(g); Subpart DDDDD	3.B.4	PM (filterable) CO HCl Hg	General Applicability
	40 CFR 63.7500(a)(1), and Table 2; Subpart DDDDD	3.B.5	PM (filterable) [or TSM]	0.02 [or 0.0058] lb./MMBTU of Heat Input; or 0.055 [or 0.016] lb./MMBTU of Steam Output
			CO	1,100 ppmv at 3% Oxygen ; or 2.4 lb./MMBTU of Steam Output
			HCl	0.022 lb./MMBTU of Heat Input; or 0.025 lb./MMBTU of Steam Output
			Hg	0.0000057 lb./MMBTU of Heat Input; or 0.0000064 lb./MMBTU of Steam Output
	40 CFR 63.7500(a)(2), (7) and Table 4 (Items 7 and 8); Subpart DDDDD	3.B.6	Operating Load Oxygen Content	Maintain Operating Limits

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.B.7	SO ₂	4.8 lb./MMBTU
AA-004	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1).	3.B.8	PM	0.6 lb./MMBTU; or $E = 0.8808 \cdot (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued July 26, 1994 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 13, 2005 and May 11, 2020 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.41c; Subpart Dc	3.B.9	PM SO ₂	Operate No More Than Two Temporary Boilers During Periods of Shutdown for Emission Point AA-002 Comply with “ <i>Temporary Boiler</i> ” Definition
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued July 26, 1994 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 13, 2005 and May 11, 2020	3.B.10		Operate Temporary Boiler(s) in Accordance with the Applicable Operating Scenario(s)
AA-014	11 Miss. Admin. Code, Pt. 2, R. 2.2.B.(14)(e).	3.B.11	Buffer Zone Criteria	≥150 Feet from Any Dwelling or Light Commercial Building
	11 Miss. Admin. Code, Pt. 2, R. 1.3.H.(1).	3.B.12	PM (filterable)	0.2 grains/dscf (at 12% CO ₂ by vol.)
	40 CFR Part 60, Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units 40 CFR 60.2010 and 60.2015(a)(1); Subpart CCCC	3.B.13	Opacity	General Applicability
	40 CFR 60.2245(b) and 60.2265; Subpart CCCC	3.B.14	Waste Restriction	Only Incinerate Wood Waste, Clean Lumber, and Yard Waste Generated On-Site

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-014	40 CFR 60.2250; Subpart CCCC	3.B.15	Opacity	≤ 35% During Start-Up Periods ≤ 10% During Operations
	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 25, 2025 (PSD Avoidance Limit)	3.B.16	Hours of Operation	1,077 Hours/Year (Rolling 12-Month Total)
AK-001 through AK-030	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a), (b) and 63.2233(c); Subpart DDDD	3.B.17	HAPs	General Applicability
AK-001 through AK-028	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018 (PSD Avoidance Limit)	3.B.18	Dried Lumber Throughput	115,000.0 MBF/Year (All Kilns Combined; Rolling 52-Week Total)
AK-001 through AK-028	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018	3.B.19	Final Moisture Content	≥ 12%
AK-029 AK-030	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued October 14, 2020 (PSD BACT Limits)	3.B.20	VOCs (as WPP1)	4.43 lb./MBF 363.5 tpy (Rolling 12-Month Total)
		3.B.21	Dried Lumber Throughput	164,114.0 MBF/Year (for Combined Kilns; 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 October 14, 2020 (PSD BACT Standard)	3.B.22	Operational Requirement	Conduct Good Work Practices

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

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

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.B.2 For Emission Point AA-002, except as otherwise specified herein, the permittee is allowed to emit PM at a rate up to 0.30 grains per dry standard cubic foot from the boiler.

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

- 3.B.3 For Emission Point AA-002, except during periods of start-up and shutdown, the permittee shall only combust uncontaminated wood waste within the boiler. For the purpose of this permit, “*uncontaminated wood waste*” is defined as any by-product generated from processing harvested timber/dried lumber (sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 4, 2023)

- 3.B.4 For Emission Point AA-002, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 10 of Subpart DDDDD).

Emission Point AA-002 is considered an existing boiler that is in the “*fuel cells designed to burn biomass/bio-based solid fuel*” subcategory. Given that the permittee transferred from an area source of HAPs to a major source of HAPs, the permittee must comply with all applicable requirements in this subpart within three (3) years after becoming a major source. As the permittee became a major source on April 13, 2021 with the completion of Emission Point AK-029, the applicable compliance date is **April 13, 2024**.

(Ref.: 40 CFR 63.7485, 63.7490(d), 63.7495(c)(2), and 63.7499(g); Subpart DDDDD)

- 3.B.5 For Emission Point AA-002, the permittee shall meet the following limitations at all times except during periods of start-up and shutdown:

- (a) Particulate matter (PM; filterable): no more than 0.02 pounds per million BTU (lb./MMBTU) of heat input or 0.055 lb./MMBTU of steam output [or total selected metals (TSM): no more than 0.0058 lb./MMBTU of heat input or 0.016 lb./MMBTU of steam output];
- (b) Carbon monoxide (CO): no more than 1,100 ppmv on a dry basis corrected to 3% oxygen or 2.4 lb./MMBTU of steam output;
- (c) Hydrogen chloride (HCl): no more than 0.022 lb./MMBTU of heat input or 0.025 lb./MMBTU of steam output;
- (d) Mercury (Hg): no more than 0.0000057 lb./MMBTU of heat input or 0.0000064 lb./MMBTU of steam output;

(Ref.: 40 CFR 63.7500(a)(1) and Table 2; Subpart DDDDD)

3.B.6 For Emission Point AA-002, the permittee shall at all times (except during periods of start-up and shutdown) comply the following operating limits:

- (a) Maintain the rolling 30-day average operating load of the boiler such that it does not exceed 110% of the highest hourly average operating load recorded during a performance test conducted to demonstrate compliance with any emission limitation specified in Condition 5.B.5.
- (b) Maintain the rolling 30-day average oxygen content at or above the lowest hourly average oxygen concentration measured during the CO performance test that demonstrates compliance with the CO emission limit specified in Condition 5.B.5.

If the boiler is installed with an oxygen trim system – maintain the oxygen content at or above the lowest hourly average oxygen concentration measured during a performance test that demonstrates compliance with the CO emission limit specified in Condition 5.B.5.

(Ref.: 40 CFR 63.7500(a)(2), (7), and Table 4 (Items 7 and 8); Subpart DDDDD)

3.B.7 For Emission Points AA-002 and AA-004, except as otherwise specified or limited herein, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input from the boiler.

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

3.B.8 For Emission Point AA-004 (Temporary Boilers), except as otherwise specified or limited herein, the permittee shall comply with one of the following PM emission limitations for each boiler (as applicable):

- (a) For a boiler that combusts a fossil fuel and has a maximum heat input of less than ten (10) MMBTU per hour, the permittee shall not exceed 0.6 pounds of PM per MMBTU per hour heat input; or
- (b) For a boiler that combusts a fossil fuel and has a maximum heat input equal to/greater than 10 MMBTU per hour heat input but less than 10,000 MMBTU per hour heat input, the permittee shall not exceed an emission rate as determined by the following 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 MMBTU per hour.

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

- 3.B.9 For Emission Point AA-004, the permittee is authorized to operate a maximum of two (2) temporary boilers only during periods of shutdown for Emission Point AA-002.

For the purpose of this permit, a “*temporary boiler*” is defined as a steam generating unit that combusts natural gas or distillate oil (i.e. fuel oil) with a potential sulfur dioxide (SO₂) emission rate no greater than 0.060 pounds per MMBTU, and the unit is designed to (and is capable of) being carried or moved from one location to another. A steam generating unit is not a “*temporary boiler*” if any of the following conditions exist:

- (a) The equipment is attached to a foundation.
- (b) The steam generating unit (or a replacement) remains at a location for more than one hundred eighty (180) consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period.
- (c) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least two (2) years, and operates at that facility for at least three (3) months each year.
- (d) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued July 26, 1994)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 13, 2005 and May 11, 2020)

(Ref.: 40 CFR 60.41c; Subpart Dc – “Temporary boiler”)

3.B.10 For Emission Point AA-004, the permittee shall operate a maximum of two (2) temporary boilers in accordance with the following operational restrictions (as applicable):

(a) Operating Scenario 1 (Natural Gas Fuel): For any temporary boiler that combusts natural gas as the primary fuel source, the permittee shall comply with the following operational restrictions:

- (1) The maximum combined heat input capacity for all temporary natural gas-fired boilers shall not exceed 65.0 MMBTU per hour; and
- (2) The permittee shall comply with the opacity limits specified in Condition 3.A.1.

(b) Operating Scenario 2 (No. 2 Fuel Oil): For any temporary boiler that combusts No. 2 fuel oil as the primary fuel source, the permittee shall comply with the following operational restrictions:

- (1) The maximum combined heat input capacity for all temporary fuel oil-fired boilers shall not exceed 48.72 MMBTU per hour;
- (2) The maximum combined No. 2 fuel oil usage shall not exceed 1,098,592.0 gallons per year based on a rolling 365-day period;
- (3) The permittee shall only combust No. 2 fuel oil that contains no more than five hundred (500) parts per million (ppm); and
- (4) The permittee shall comply with the opacity limitations specified in Condition 3.A.1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued July 26, 1994)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as modified in the Title V Operating Permit issued April 13, 2005 and May 11, 2020)

3.B.11 For Emission Point AA-014, the permittee shall install and operate the air curtain incinerator (ACI) at least one hundred fifty (150) feet from any dwelling or any light commercial building not owned by the permittee and at least 150 feet from the nearest residential or recreational area.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(14)(a) and (e).)

3.B.12 For Emission Point AA-014, the maximum discharge of particulate matter (PM) from the ACI shall not exceed 0.2 grains per standard dry cubic foot calculated to twelve percent (12%) carbon dioxide (CO₂) by volume. This limitation shall apply when the ACI is operating at its designed capacity.

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

- 3.B.13 For Emission Point AA-014, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units and 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.2010 and 60.2015(a)(1); Subpart CCCC)

- 3.B.14 For Emission Point AA-014, the permittee shall only incinerate a 100 percent mixture of wood waste, clean lumber, and/or yard waste generated on-site. For the purpose of this permit, the noted wastes are defined as such:

- (a) “Wood waste” is defined as untreated wood and untreated wood products, including tree stumps (whole or chipped), trees, tree limbs (whole or chipped), bark, sawdust, chips, scraps, slabs, millings, and shavings.
- (b) “Clean lumber” is defined as wood or wood products that have been cut or shaped and include wet, air-dried, and kiln-dried wood products (but does not include wood products that have been painted, pigment-stained, or pressure-treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote); and
- (c) “Yard waste” is defined as grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs generated from maintaining yards owned solely by the permittee.

(Ref.: 40 CFR 60.2245(b) and 60.2265; Subpart CCCC)

- 3.B.15 For Emission Point AA-014, the permittee shall comply with the following opacity limitations:

- (a) Maintain an opacity of less than or equal to thirty-five percent (35%) during any start-up period within the first thirty (30) minutes of operation; and
- (b) Except as provided in paragraph (a) of this condition and periods of malfunction, maintain an opacity of less than or equal to ten percent (10%) at all times.

(Ref.: 40 CFR 60.2250; Subpart CCCC)

- 3.B.16 For Emission Point AA-014, the permittee shall limit the hours of operation to no more than 1,077 hours per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 25, 2025 – PSD Avoidance Limit)

- 3.B.17 For Emission Points AK-001 through AK-030, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions. Emission Points AK-001 through AK-030 are only subject to an initial notification requirement, which has been satisfied.

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

- 3.B.18 For Emission Points AK-001 through AK-028, the permittee shall limit the total throughput of lumber dried within all batch kilns to no more than 115,000.0 thousand board feet (MBF) per year based on a rolling 52-week total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018 – PSD Avoidance Limit)

- 3.B.19 For Emission Points AK-001 through AK-028, the permittee shall limit the final moisture content of dried lumber produced within each batch drying kiln to twelve (12) percent or greater.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued October 3, 2018)

- 3.B.20 For Emission Points AK-029 and AK-030, the permittee shall limit the emission of volatile organic compounds as determined by Wood Products Protocol 1 (VOCs as WPP1) to no more than 4.43 pounds per MBF and no more than 363.5 tons per year (tpy) based on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued October 14, 2020 – PSD BACT Limit)

- 3.B.21 For Emission Points AK-029 and AK-030, the permittee shall limit the total throughput of lumber dried within the dual-path kilns to no more than 164,114.0 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), as established in the PSD Permit to Construct issued October 14, 2020 – PSD BACT Limit)

- 3.B.22 For Emission Points AK-029 and AK-030, the permittee shall operate the dual-path kilns in accordance with the manufacturer's recommendations and a "Good Work Practices Plan". The plan shall outline a schedule for all actions necessary to conduct (at a minimum) the following inspection and maintenance activities:

- (a) Walk-around inspection;
- (b) Wet bulb proper operation;
- (c) Entrance and exit baffles inspection;

- (d) Grease kiln cart wheels and fan shafts bearings;
- (e) Hydraulic oil levels;
- (f) Calibration of moisture content equipment; and
- (g) Temperature probe calibration.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued October 14, 2020 – PSD BACT Standard)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb./MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lb./MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input 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).)

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-002	40 CFR 63.7500(a)(3); Subpart DDDDD	3.D.1	HAPs	General Duty Clause
	40 CFR 63.7510(e), 63.7515(d), 63.7530(h), 63.7540(a)(10), and Table 3 (Item 3); Subpart DDDDD	3.D.2		Conduct an Annual Tune-Up
	40 CFR 63.7530(h) and Table 3 (Items 5 and 6); Subpart DDDDD	3.D.3		Start-Up and Shutdown Requirements
AA-014	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 25, 2025	3.D.4	PM VOCs	Conduct Best Management Practices

- 3.D.1 For Emission Point AA-002, the permittee shall at all times operate and maintain the unit (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that 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 63.7500(a)(3); Subpart DDDDD)

- 3.D.2 For Emission Point AA-002, the permittee shall conduct an initial tune-up on the boiler no later than April 13, 2024 and annually thereafter [not to exceed thirteen (13) months after the previously completed tune-up]. If a boiler is not operating on the required date for a tune-up, the permittee shall conduct the tune-up within thirty (30) calendar days of start-up.

Each tune-up shall be conducted in accordance with the following provisions:

- Inspect the burner (as applicable) and clean/replace any components of the burner as necessary. The inspection may be performed at any time prior to the tune-up or delayed until the next scheduled boiler shutdown.
- Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications (if available).

- (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. The inspection may be delayed until the next scheduled boiler shutdown.
- (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxide (NO_x) requirement to which a boiler is subject.
- (e) Measure the concentrations in the effluent stream of CO in parts per million by volume (ppmv) and oxygen (O₂) in volume percent (vol.%) before and after the adjustments are made. The measurements may be either on a wet or dry basis as long as the basis remains the same before and after the adjustments are made. The measurements may be taken using a portable CO analyzer.
- (f) The permittee shall maintain on-site the following information collected during a tune-up:
 - (1) The concentration of CO in the effluent stream in ppmv and O₂ in vol.% measured at high fire or the typical operating load before and after the tune-up of a boiler;
 - (2) A description of any corrective action taken as a part of the tune-up of a boiler; and
 - (3) The type and amount of fuel used over the last twelve (12) months prior to tune-up of a boiler but only if the unit was physically and legally capable of using more than one type of fuel during that period.

(Ref.: 40 CFR 63.7510(e), 63.7515(d), 63.7530(h), 63.7540(a)(10), and Table 3 (Item 3); Subpart DDDDD)

3.D.3 For Emission Point AA-002, the permittee shall operate the boiler in accordance with the following requirements during periods of start-up and shutdown.

- (a) All continuous monitoring systems (CMS) must be operated during start-up and shutdown.
- (b) For start-up, the permittee must use one or a combination of the following clean fuels: natural gas; synthetic natural gas; propane; other "gas 1 fuels"; distillate oil; syngas; ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas; liquefied petroleum gas; clean dry biomass; and any fuels meeting the appropriate hydrogen chloride, mercury, and total suspended matter emission standards by fuel analysis.
- (c) The permittee shall comply with one (1) of the following work practice standard options:

- (1) If the permittee chooses to comply using definition (1) of “start-up” found in 40 CFR 63.7575 – Subpart DDDDD (once firing a fuel that is not clean fuel), the permittee must vent emissions to the main stack(s) and engage all of the applicable control devices. Start-up ends when steam or heat is supplied for any purpose; or
- (2) If the permittee chooses to comply using definition (2) of “start-up” (once feeding a fuel that is not a clean fuel), the permittee must vent emissions to the main stack(s) and engage all of the applicable control devices so as to comply with the emission limits within four (4) hours of the start of supplying useful thermal energy.

The permittee must engage and operate particulate matter (PM) control within one (1) hour of first feeding a fuel that is not a clean fuel. The permittee must start all applicable control devices as expeditiously as possible except in any case when necessary to comply with other standards applicable to the boiler by a permit limit or a rule other than Subpart DDDDD that requires operation of the control device(s).

The permittee must develop and implement a written “Start-Up and Shutdown Plan” in accordance with 40 CFR 63.7505(e), Subpart DDDDD.

- (d) While firing a fuel that is not a clean fuel during shutdown, the permittee must vent emissions to the main stack(s) and operate all applicable control devices. If another fuel must be used to support the shutdown process (in addition to the fuel used prior to the initiation of shutdown), the additional fuel must be one or a combination of the following clean fuels: natural gas; synthetic natural gas; propane; other “gas 1 fuels”; distillate oil; syngas; ultra-low sulfur diesel; refinery gas; and liquefied petroleum gas.
- (e) The permittee must comply with all applicable emission limits at all times except for start-up or shutdown periods conforming with the work practices specified in this condition.
- (f) The permittee must keep records during periods of startup and shutdown.

(Ref.: 40 CFR 63.7530(h) and Table 3 (Items 5 and 6); Subpart DDDDD)

3.D.4 For Emission Point AA-014, the permittee shall adhere to the following work practices:

- (a) The permittee shall operate and maintain the ACI in accordance with the manufacturer’s specifications to ensure the complete burning of material charged into the firebox. Additionally, the permittee shall maintain the manufacturer’s specifications on-site for review by MDEQ personnel (upon request).

- (b) After sufficient time for cooling, the permittee shall water ash within the ACI prior to its removal to prevent the ash from becoming airborne.
- (c) The permittee shall only utilize gasoline, kerosene, diesel fuel, natural gas, or liquefied petroleum as the fuel source for any start-up fire within the ACI. Additionally, the permittee shall minimize (to the best extent practicable) the amount of fuel necessary to ignite a start-up fire.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 25, 2025)

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 terms and conditions contained in this permit (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 information:
- (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 the following information:

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

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

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

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

- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

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

- 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 respective versions (or their equivalents) approved by 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 of this permit, the monitoring, testing, recordkeeping, and reporting requirements specified in Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-100 (Facility-Wide)	40 CFR 52.21(r)(6)(iii); Subpart A	5.B.1	PM (filterable) PM ₁₀ /PM _{2.5} (filterable + condensable)	Calculate and Maintain Project-Related Emissions Increases
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	PM/PM ₁₀ (filterable only)	Perform an Inspection/Maintenance Action on the Cyclone Weekly
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.3	Opacity	Perform a Visible Emission Observation Weekly
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.4	Steam Production	Monitor Steam Production (Weekly Average and Rolling 52-Week Total)
	40 CFR 63.7510(a), (c) – (e), 63.7515(a) – (c), and 63.7520(b) – (f); Subpart DDDDD	5.B.5	PM (filterable) [or TSM] CO	Conduct Performance Testing Annually or Every 3 Years (As Applicable)
	40 CFR 63.7505(d) and 63.7520(a); Subpart DDDDD	5.B.6	HCl Hg	Develop Site-Specific Monitoring and Stack Test Plans
	40 CFR 63.7525(a); Subpart DDDDD	5.B.7	O ₂	Install, Operate, and Maintain an Analyzer System
	40 CFR 63.7525(d) and 63.7535; Subpart DDDDD	5.B.8	Operating Load	CMS Requirements
	40 CFR 63.7525(a), 63.7530(b)(4)(viii), and Table 7 (Item 4); Subpart DDDDD	5.B.9	O ₂	Establish the Minimum Level Operating Limit
	40 CFR 63.7520(c) and Table 7 (Item 5); Subpart DDDDD	5.B.10	Operating Load	Establish the Maximum Operating Limit
	40 CFR 63.7540(a)(1), (2)(ii), (10), and Table 8 (Items 9 and 10); Subpart DDDDD	5.B.11	O ₂ Operating Load Fuel Usage	Recordkeeping Requirements
	40 CFR 63.7555(a)(1) – (2), (b)(1), (3), (5), (c), (d)(1), (3) – (8), and 63.7560(a); Subpart DDDDD	5.B.12	O ₂ Operating Load Fuel Usage	Recordkeeping Requirements
	40 CFR 63.7555(d)(9) – (13); Subpart DDDDD	5.B.13	Start-Up/ Shutdown Periods	Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.14	Sulfur Content Fuel Usage	Monitor Fuel Oil-Related Data
AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.15	PM Opacity	Conduct an Annual Inspection
	40 CFR 60.2255; Subpart CCCC 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.16	Opacity	Conduct Routine Method 9 Testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2). 40 CFR 60.2260(b) and (f); Subpart CCCC	5.B.17	Hours of Operation Opacity	Maintain Documentation on Required Information
AK-001 through AK-028	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.18	Lumber Throughput	Monitor Total Throughput from All Batch Kilns
		5.B.19	Final Moisture Content	Monitor Moisture Content of Dried Lumber Processed in the Planer Mill (Rolling 52-Week Average)
AK-029 AK-030	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.20	Lumber Throughput	Monitor Total Throughput from Both Dual Path Kilns
		5.B.21	VOCs HAPs	Record Inspections/Maintenance Actions in Accordance with Good Work Practices Plan

5.B.1 For Emission Point AA-100 (Facility-Wide), the permittee shall monitor the respective emission increase of particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable + condensable), and particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$; filterable + condensable) as a result of the construction project (i.e. installation of the Dual Path Lumber Kilns) authorized in the PSD Permit to Construct Air Emissions Equipment issued October 14, 2020.

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

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

5.B.2 For Emission Point AA-001, the permittee shall perform an inspection that evaluates the performance capability of the cyclone associated with the planer shavings pneumatic transfer system on a weekly basis (or more often if necessary). If a problem

is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair the cyclone.

The permittee shall maintain documentation that details the date/time of each inspection, the results of each inspection, any problem that is experienced during an inspection, any maintenance (either corrective or preventative) performed to return the cyclone to operation as originally designed, and the duration in which the cyclone is non-operational due to malfunction.

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

- 5.B.3 For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with the applicable opacity limitations by performing a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust from each stack during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall perform and record a visible emission evaluation (VEE) in accordance with EPA Test Method 9. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE. The VEE shall be performed by an individual that is certified as a visible emission reader by the MDEQ or an equivalent agency qualified for such services.

The permittee shall maintain documentation that details the information specified by Method 22 and/or Method 9, the date and time of each observation/evaluation, the results each observation/evaluation, and any corrective actions taken to prevent or minimize emissions.

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

- 5.B.4 For Emission Point AA-002, the permittee shall calculate and record the total quantity (in pounds) of steam generated by the boiler based on both a weekly (i.e. 7-day block) average and rolling 52-week total.

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

- 5.B.5 For Emission Point AA-002, the permittee shall demonstrate initial compliance with the PM (filterable) [or TSM], CO, hydrogen chloride (HCl), and mercury (Hg) emission limits specified in Condition 3.B.5 by conducting performance testing no later than October 10, 2024 and annually thereafter [not to exceed thirteen (13) months after the previously completed test]. Each test shall be conducted in accordance with the following requirements:

- (a) All performance testing shall be performed in accordance with the requirements specified in 40 CFR 63.7520 and Table 5, Subpart DDDDD and at representative load conditions.
- (b) If a performance test for a given pollutant specified by Condition 3.B.5 (i.e. PM [or TSM], CO, HCl, and Hg) are at or below 75% of the corresponding emission limit for at least two (2) consecutive years **and** there have been no changes to the operation of the boiler or air pollution control equipment that could increase emissions, the permittee may choose to conduct subsequent performance tests for the pollutant once every three (3) years [not to exceed thirty-seven (37) months after the previously completed test].

If a performance test results for a specific pollutant indicates that the emissions are in excess of 75% of the corresponding emission limitation, the permittee must resume testing on an annual basis until such time the performance tests over a two-year period fall below 75% of the emission limit.

- (c) The permittee shall conduct a fuel analysis for each type of fuel burned the boiler in accordance with 40 CFR 63.7521 and Table 6 in Subpart DDDDD.
- (d) During each performance test, the permittee shall establish the operating limits specified in Condition 3.B.6 in accordance with Table 7 in Subpart DDDDD and conduct CMS performance evaluations in accordance with 40 CFR 63.7525, Subpart DDDDD.

(Ref.: 40 CFR 63.7510(a), (c) – (e), 63.7515(a) – (c), and 63.7520(b) – (f); Subpart DDDDD)

- 5.B.6 For Emission Point AA-002 the permittee shall maintain a site-specific monitoring plan in accordance with the requirements in 40 CFR 63.7505(d)(1) – (4), Subpart DDDDD for the use of any continuous parameter monitoring system (CPMS).

Additionally, the permittee shall maintain a site-specific stack test plan in accordance with 40 CFR 63.7(c), Subpart A that includes a test program summary, a test schedule, data quality objectives, and both an internal and external quality assurance program. The data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.

(Ref.: 40 CFR 63.7505(d) and 63.7520(a); Subpart DDDDD)

- 5.B.7 For Emission Point AA-002, the permittee shall install, operate, and maintain an oxygen analyzer system in accordance with the manufacturer's recommendations. Additionally, the permittee shall maintain documentation that details the manufacturer's recommendations for the system.

For the purpose of this condition, an “*oxygen analyzer system*” means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in

the boiler flue gas, boiler, firebox, or other appropriate location (including oxygen trim systems).

(Ref.: 40 CFR 63.7525(a); Subpart DDDDD)

5.B.8 For Emission Point AA-002, the permittee shall operate and maintain each continuous monitoring system (CMS) in accordance with the site-specific monitoring plan required by Condition 5.B.6 and the following procedures:

- (a) The CMS must complete a minimum of one (1) cycle of operation every fifteen (15) minutes and have a minimum of four (4) successive cycles of operation to have a valid hour of data. Any 15-minute period for which a CMS is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements.

Other situations that constitute a monitoring deviation are specified in paragraph (d) of this condition.

- (b) The permittee shall operate monitoring systems and collect data at all required intervals at all times that the boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out-of-control periods, and required monitoring system quality assurance or control activities, including (as applicable) calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the site-specific monitoring plan.

A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The permittee is required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.

- (c) The permittee may not use data recorded during periods of start-up and shutdown, monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or control activities in data averages and calculations used to report emissions or operating levels.

The permittee shall record and make available upon request the results of CMS performance audits and the date/duration of periods when the CMS is out-of-control to completion of the corrective actions necessary to return the CMS to operation consistent with the site-specific monitoring plan. The permittee must use all data collected during all other periods in assessing compliance and the operation of the control device and associated control system.

- (d) Except during periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities, the failure to collect required data is a deviation of the monitoring requirements.

In calculating monitoring results, the permittee shall not use any data collected during periods of start-up and shutdown, when the monitoring system is out-of-control as specified in the site-specific monitoring plan, while conducting repairs associated with periods when the monitoring system is out-of-control, or while conducting required monitoring system quality assurance or quality control activities. The permittee must calculate monitoring results using all other monitoring data collected while the boiler is in operation.

- (e) The permittee must determine the rolling 30-day average for each applicable operating limit from all recorded readings, except as allowed in paragraph (c) of this condition.
- (f) The permittee shall record and maintain the results of each inspection, calibration, and/or validation check performed on a CMS.

(Ref.: 40 CFR 63.7525(d) and 63.7535; Subpart DDDDD)

- 5.B.9 For Emission Point AA-002, the permittee shall demonstrate continuous compliance with the CO emission limit specified in Condition 3.B.5 by establishing the minimum oxygen level to be monitored by the oxygen analyzer system.

The minimum oxygen level shall be set at the lower of the minimum values established during the applicable performance test runs by collecting oxygen data every fifteen (15) minutes during the entire period of the performance test. The permittee shall determine the hourly average oxygen concentration by computing the hourly averages using all of the 15-minute readings taken during each performance test run and determine the lowest hourly average established during the performance test as the minimum operating limit.

(Ref.: 40 CFR 63.7525(a), 63.7530(b)(4)(viii), and Table 7 (Item 4); Subpart DDDDD)

- 5.B.10 For Emission Point AA-002, the permittee shall demonstrate continuous compliance with the emission limits, specified in Condition 3.B.5, by establishing the maximum operating load to be monitored by the operating load monitors or steam generation monitors.

The permittee must establish the maximum operating load by conducting a performance test required by Condition 5.B.5 at representative operating load conditions while burning the type of fuel (or mixture of fuels) that has the highest content of chlorine, mercury, and TSM (if opting to comply with the TSM alternative standard).

The permittee shall collect either operating load or steam generation data every fifteen (15) minutes during the entire period of a performance test, determine the hourly average operating load or steam generation rate by computing the hourly averages using all of the 15-minute readings taken during a performance test, and determine the highest hourly average established during the performance test. The resulting operating limit shall be established by multiplying the highest hourly average by 1.1 (i.e. 110 percent).

(Ref.: 40 CFR 63.7520(c) and Table 7 (Item 5); Subpart DDDDD)

5.B.11 For Emission Point AA-002, the permittee shall demonstrate continuous compliance with the applicable emission limits, the work practice standards, and operating limits in accordance with the following methods:

- (a) Continuously monitor the oxygen content using an oxygen analyzer system in accordance with Condition 5.B.7.

Reduce the data to a rolling 30-day average and maintain the rolling 30-day average oxygen content at or above the lowest hourly average oxygen level measured during the most recent CO performance test required by Condition 5.B.5.

- (b) Collect either the operating load data or steam generation data every fifteen (15) minutes.

Reduce the data to a rolling 30-day average and maintain the rolling 30-day average operating load or steam generation rate such that it does not exceed 110% of the highest hourly average operating load or steam generation rate recorded during the most recent performance test required by Condition 5.B.5.

- (c) After the initial compliance demonstration is completed, operation either above the established maximum operating limit or below the established minimum operating limit (as applicable) is a deviation except during a performance test conducted either to determine compliance with an applicable emission limit or to establish a new operating limit. An operating limit must be confirmed and/or reestablished during a performance test.

- (d) Maintain records on the type and amount of all fuels burned in the boiler to demonstrate that all fuel types and mixtures of fuels burned would result in equal to or lower fuel input of chlorine, mercury, and total selected metals (TSM) than the maximum values calculated during the last performance test.

- (e) Conduct tune-ups in accordance with Condition 3.D.2.

(Ref.: 40 CFR 63.7540(a)(1), (2)(ii), (10), and Table 8 (Items 9 and 10); Subpart DDDDD)

5.B.12 For Emission Point AA-002, the permittee shall maintain the following information:

- (a) A copy of each notification and report submitted to comply with Subpart DDDDD, (including all documentation supporting an Initial Notification of Compliance Status or a semi-annual compliance report);
- (b) Records on all performance tests, other compliance demonstrations, and performance evaluations;
- (c) For each CMS, the permittee shall maintain the following information:
 - (1) Records described in 40 CFR 63.10(b)(2)(vii) – (xi), Subpart A;
 - (2) Previous versions of the performance evaluation plan as required by 40 CFR 63.8(d)(3), Subpart A; and.
 - (3) Records on the date and time each deviation started and stopped.
- (d) Records required by Condition 5.B.11, including documentation on all monitoring data and calculated averages for applicable operating levels (oxygen level, operating load, etc.) to demonstrate continuous compliance with each applicable emission limit and operating limit.
- (e) The quantity of each fuel type combusted in the boiler on a monthly basis.
- (f) A copy of all calculations and supporting documentation for the maximum chlorine fuel input, maximum mercury fuel input (as specified in 40 CFR 63.7530, that were done to demonstrate continuous compliance with the applicable emission limit. Supporting documentation should include the basis for the estimates of maximum chlorine, mercury and TSM fuel input.
- (g) If the permittee chooses to conduct performance testing less frequently than that specified in Condition 5.B.5, the permittee shall maintain records that both demonstrate the results from the previous stack tests were less than 75% of the applicable emission limitation(s) and indicates that there was no change in source operations (including fuel composition and operation of the air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year);
- (h) Records on the occurrence and duration of each malfunction of either the boiler or the associated air pollution control and monitoring equipment; and
- (i) Records on the actions taken during periods of malfunction to minimize emissions in accordance with Condition 3.D.1 to minimize emissions (including corrective actions to restore the malfunctioning boiler, air pollution control or monitoring equipment to its normal use or usual manner of operation).

(Ref.: 40 CFR 63.7555(a)(1) – (2), (b)(1), (3), (5), (c), (d)(1), (3) – (8), and 63.7560(a); Subpart DDDDD)

5.B.13 For Emission Point AA-002, the permittee shall maintain the following documentation for periods of start-up and shutdown:

- (a) Records on the calendar date, time, occurrence, and duration of each event;
- (b) Records on the type(s) and amount(s) of fuels used during each event;
- (c) For each start-up period conducted under paragraph (2) of the “start-up” definition in 40 CFR 63.7575 – Subpart DDDDD, the permittee shall maintain the following information:
 - (1) The time that clean fuel combustion begins;
 - (2) The time when the permittee starts feeding fuels that are not clean fuels;
 - (3) The time when useful thermal energy is first supplied; and
 - (4) The time when the PM controls are engaged.
- (d) If each start-up period conducted under paragraph (2) of the “start-up” definition, the permittee must maintain documentation on the hourly steam temperature, hourly steam pressure, hourly steam flow, hourly flue gas temperature, and all hourly average CMS data (e.g. scrubber pressure drop, scrubber liquid flow rate, etc.) collected during each startup period to confirm that the control devices are engaged.
- (e) If the permittee chooses to use paragraph (2) of the “start-up” definition and the permittee is unable to safely engage/operate the PM control(s) within one (1) hour of first firing of non-clean fuels, the permittee may either choose to rely on paragraph (1) of the “start-up” definition or submit a request for a variance with the PM controls requirement to the MDEQ [as described in 40 CFR 63.7555(d)(13), Subpart DDDDD].

(Ref.: 40 CFR 63.7555(d)(9) – (13); Subpart DDDDD)

5.B.14 For Emission Point AA-004, the permittee shall monitor and record the following information upon start-up of a temporary boiler that combusts No. 2 fuel oil:

- (a) Documentation that identifies the sulfur content/concentration of the fuel oil being combusted; and
- (b) The volume (in gallons) of fuel oil combusted both daily and on a rolling 365-day total.

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

- 5.B.15 For Emission Point AA-014, the permittee shall conduct and record an inspection of the ACI in accordance with the manufacturer's recommendations on an annual basis (at a minimum) and not to exceed twelve (12) months after the previously completed inspection.

If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the ACI as originally designed. The records for each inspection (and any maintenance performed) shall be maintained and made available to the MDEQ (upon request).

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

- 5.B.16 For Emission Point AA-014, the permittee shall demonstrate compliance with the opacity limits specified in Condition 3.B.15 by conducting routine opacity testing on the exhaust emitted from the ACI in accordance with EPA Test Method 9 and the following requirements:

- (a) The initial testing shall be conducted within sixty (60) days after the ACI reaches the maximum charge rate at which it will operate but no later than one hundred eighty (180) days after initial start-up. Thereafter, subsequent testing shall be conducted on an annual basis not to exceed twelve (12) months after the previously completed evaluation.
- (b) Each test (or part of a test) shall be performed during daylight hours and during representative operating conditions.
- (c) Unless otherwise specified herein, the result of each test shall be determined from the average of three (3) 1-hour blocks. Each block shall consist of the average of ten (10) 6-minute evaluations, and each 6-minute evaluation shall be the average of twenty-four (24) total consecutive observations completed once every fifteen (15) seconds.
- (d) For the initial testing to demonstrate compliance with Condition 3.B.15(a), the permittee shall evaluate six (6) separate start-up periods in order to satisfy the criteria outlined in paragraph (c) of this condition.
- (e) For any subsequent testing, the permittee may demonstrate compliance with the noted opacity limit by evaluating (at a minimum) one (1) start-up period.
- (f) For the initial testing to demonstrate compliance with Condition 3.B.15(b), the permittee shall evaluate an operational period (or number of operational periods, except for periods of malfunction or start-up) that satisfies the criteria outlined in paragraph (c) of this condition.

For any subsequent testing, the permittee shall evaluate an operational period (or number of operational periods, except for periods of malfunction or start-up) within the applicable 12-month span that satisfies the criteria outlined in paragraph (c) to the best extent practicable. If the total operational period does not satisfy the criteria outlined in paragraph (c), the permittee shall determine a result from the completed testing and maintain documentation that details the duration of the non-evaluated period (and why the permittee was unable to evaluate the noted period).

(Ref.: 40 CFR 60.2255; Subpart CCCC)

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

5.B.17 For Emission Point AA-014, the permittee shall maintain documentation that contains the following information:

- (a) The hours of operation in which the authorized wastes (as specified in Condition 3.B.14) are incinerated on a monthly basis;
- (b) The results from the initial and annual opacity tests in either paper copy or electronic format for at least five (5) years; and
- (c) A copy of the initial and annual opacity test reports on-site for a period of five (5) years.

(Ref.: 40 CFR 60.2260(b) and (f); Subpart CCCC)

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

5.B.18 For Emission Points AK-001 through AK-028, the permittee shall monitor and record the total throughput of lumber dried within all batch kilns in MBF based on both a weekly and rolling 52-week total basis.

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

5.B.19 For Emission Points AK-001 through AK-028, the permittee shall demonstrate compliance with the moisture limit specified in Condition 3.B.19 by monitoring and recording the final moisture content of dried lumber processed through the planer mill based on a rolling 52-week average.

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

5.B.20 For Emission Points AK-029 and AK-030, the permittee shall monitor and record the total throughput of lumber dried within both dual path kilns MBF based on both a monthly and rolling 12-month total basis.

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

- 5.B.21 For Emission Points AA-029 and AK-030, the permittee shall maintain documentation that detail the results of each inspection and/or maintenance action performed on each kiln in accordance with the “Good Work Practices Plan” outlined in Condition 3.B.22.

If any problem is noted during an inspection, the permittee shall perform the necessary corrective maintenance to ensure the operation of a kiln as originally designed.

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-100 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.1	Cyclone Maintenance/ Malfunctions Steam Generation ACI Hours of Operation Dried Lumber Throughput	Submit a Semi-Annual Monitoring Report
	40 CFR 52.21(r)(6)(v); Subpart A	5.C.2	PM (filterable) PM ₁₀ /PM _{2.5} (filterable + condensable)	Submit Calculated Annual Emissions
	40 CFR 63.7545(a); Subpart DDDDD	5.C.3	PM (filterable) [or TSM] CO HCl Hg	Submit Initial Notifications (As Applicable)
	40 CFR 63.7550(a), (b)(1) – (4), (c)(1), (3) – (5), (d), and (e); Subpart DDDDD	5.C.4		Submit a Compliance Report
	40 CFR 63.7550(h); Subpart DDDDD	5.C.5		CEDRI Reporting Requirements
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.6	Temporary Boiler Usage	Submit a Notification on Impending Usage of a Temporary Boiler and Boiler-Related Data
		5.C.7		Submit a Notification Related to Temporary Boiler Start-Up and On-Site Removal
	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.8	Fuel Oil Usage Sulfur Content	Submit a Semi-Annual Report on Daily Fuel Usage and Sulfur Content (Fuel Oil) (As Applicable)
AA-014	40 CFR 60.2260(d); Subpart CCCC	5.C.9	Opacity	Submit Method 9 Test Results
AK-001 through AK-028	11 Miss Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.10	Final Moisture Content	Submit an Annual Certification on Final Moisture Content for Dried Softwood Processed through the Planer Mill

- 5.C.1 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information:
- (a) For Emission Point AA-001 – any maintenance action(s) performed on the cyclone and any periods of time (including the date and duration) in which the device malfunctioned;
 - (b) For Emission Point AA-002 – the quantity (in pounds) of steam generated by the boiler based on a rolling 52-week total basis;
 - (c) For Emission Point AA-014 – the hours of operation for the ACI on a rolling 12-month total basis;
 - (d) For Emission Points AK-001 through AK-028 – the total throughput (in MBF) of lumber dried within all batch drying kilns based on a 12-month rolling total basis;
 - (e) For Emission Points AK-029 and AK-030:
 - (1) The total throughput (in MBF) of lumber dried within both dual-path drying kilns based on a rolling 12-month total basis; and
 - (2) Any revision(s) made to the “Good Work Practices Plan” required by Condition 3.B.22.

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

- 5.C.2 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 – when applicable) of each year for the preceding 12-month calendar year that contains the information specified in paragraphs (a) – (c) of this condition **if** the calculated annual emissions required by Condition 5.B.1 either exceed the baseline actual emissions documented for PM, PM₁₀ (filterable + condensable) and/or PM_{2.5} (filterable + condensable) in the pre-construction PSD major modification applicability test by a “significant” amount [as defined in 40 CFR 52.21(b)(23); Subpart A] or differ from the established pre-construction projected emission presented in the permit application received on July 24, 2020.
- (a) The name, address, and telephone number of the facility;
 - (b) The calculated annual emissions as specified in Condition 5.B.1; and
 - (c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections).

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

- 5.C.3 For Emission Point AA-002, the permittee shall submit to the MDEQ the applicable notifications required by 40 CFR Part 63, Subpart A [i.e. 40 CFR 63.7(b) – (c), 40 CFR 63.8(e), 40 CFR 63.9(b) – (h), and 40 CFR 63.10(d)(2)] by the specified deadlines.

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

- 5.C.4 For Emission Point AA-002, the permittee shall submit a semi-annual compliance report in accordance with Condition 5.A.4 that contains the following information (as applicable):

- (a) The company (and facility name, if applicable) and the address;
- (b) Information on the process unit, applicable emission limitations, and applicable operating parameter limitations;
- (c) The date of report and beginning and ending dates of the reporting period;
- (d) The date of the most recent tune-up (including the date of the most recent burner inspection if it was not completed on an annual basis and was delayed until the next scheduled or unscheduled unit shutdown)
- (e) A statement by a responsible official with that official's name, title, and signature in addition a statement certifying the truth, accuracy, and completeness of the content of the report; and
- (f) For each CMS (including a CPMS) – the monitoring equipment manufacturer(s), the model number(s), and the date of the last CMS certification or audit;
- (g) The total fuel use by the boiler – including (but not limited to) a description of the fuel, whether the fuel has received a non-waste determination by the EPA or the permittee's basis for concluding the fuel is not a waste, and the total fuel usage amount with units of measure;
- (h) If the permittee is conducting a performance test once every three (3) years [as allowed in Condition 5.B.5(b)], the date of the last two (2) performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions;
- (i) A statement indicating no new types of fuel were burned in the boiler. If a new type of fuel was burned, the permittee shall submit the required HCl, Hg, and TSM information in accordance with 40 CFR 63.7550(c)(5)(viii), Subpart DDDDD;
- (j) If the permittee intends to burn a new type of fuel that is non-compliant with the maximum chlorine, mercury, or TSM input operating limits, the permittee shall include a statement indicating the intent to conduct a new performance test no later than sixty (60) days after starting to burn the new fuel;

- (k) If there are no deviations from applicable emission limitations or operating limitations, include a statement that there were no deviations from the emission or operating limitations during the reporting period;
- (l) If there were no deviations from monitoring requirements (including no periods during which a CMS was out of control), include a statement that there were no deviations and no periods during which the monitoring system was out of control during the reporting period;
- (m) If a malfunction occurred during the reporting period, the report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused/may have caused any applicable emission limitation to be exceeded.

The report must also include a description of any action(s) taken during a malfunction of the boiler, the associated air pollution control device, or the CMS to minimize emissions (including actions taken to correct the malfunction).

- (n) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (o) For each instance of start-up or shutdown, include the information required to be monitored, collected, or recorded as specified in Condition 5.B.13.
- (p) If there is a deviation from an emission limit, operating limit, or work practice standard for periods of start-up and shutdown where a CMS **is not** used to demonstrate compliance, the compliance report shall also contain the following information:
 - (1) A description of the deviation and for which emission limit, operating limit, or work practice standard it occurred;
 - (2) Information on the number, duration, and cause of deviations (including any unknown cause, as applicable), and the corrective action taken; and
 - (3) If the deviation occurred during an annual performance test, the date in which the annual performance test was completed.
- (q) If there is a deviation from an emission limit, operating limit, or monitoring requirement where a CMS **is** used to demonstrate compliance, the compliance report shall also contain the following information:
 - (1) The date and time each deviation started and stopped and description of the nature of the deviation;
 - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks;

- (3) The date, time, and duration that each CMS was out of control (including the information specified in 40 CFR 63.8(c)(8), Subpart A);
- (4) A summary of the total duration of the deviation during a reporting period and the total duration as a percent of the total source operating time during that reporting period;
- (5) A characterization of the total duration of the deviations during a reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
- (6) A summary of the total downtime duration for the CMS during a reporting period and the total duration of the CMS downtime as a percent of the total source operating time during that reporting period;
- (7) A brief description of the source for which there was a deviation; and
- (8) A description of any changes in the CMS, the processes, or controls since the last reporting period for the source for which there was a deviation.

(Ref.: 40 CFR 63.7550(a), (b)(1) – (4), (c)(1), (3) – (5), (d), and (e); Subpart DDDDD)

- 5.C.5 For Emission Point AA-002, the permittee shall submit any performance test report and semi-annual compliance report required by Subpart DDDDD to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) website [<https://cdx.epa.gov/>]. Each electronic submittal shall be completed in accordance with 40 CFR 63.7550(h)(1) – (3), Subpart DDDDD.

(Ref.: 40 CFR 63.7550(h); Subpart DDDDD)

- 5.C.6 For Emission Point AA-004, the permittee shall notify the MDEQ in writing about the intent to install and operate a temporary boiler no later than thirty (30) days prior to its on-site arrival. Additionally, the permittee shall include with this notification the following information:

- (a) The maximum heat input capacity of each boiler;
- (b) The primary fuel source to be combusted within each boiler; and
- (c) The projected duration (in days) in which each temporary boiler will be operated.

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

- 5.C.7 For Emission Point AA-004, the permittee shall notify the MDEQ in writing of the following events no later than fifteen (15) days after the actual date:

- (a) The actual start-up of a temporary boiler; and
- (b) The removal of a temporary boiler from on-site.

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

- 5.C.8 For Emission Point AA-004, if the permittee operates a temporary boiler that combusts No. 2 fuel oil as the primary fuel source, the permittee shall submit a report in conjunction with the semi-annual monitoring report (SMR) for the corresponding period that details the following information:

- (a) The volume (in gallons) of fuel oil combusted daily in a temporary boiler; and
- (b) The sulfur content of each fuel oil shipment that is combusted.

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

- 5.C.9 For Emission Point AA-014, the permittee shall submit the results of the initial opacity test required by Condition 5.B.16 no later than sixty (60) days after completing the test in full. Thereafter, the permittee shall submit the results (and any supporting documentation – as applicable) of all subsequent testing no later than twelve (12) months after the previously submitted results.

(Ref.: 40 CFR 60.2260(d); Subpart CCCC)

- 5.C.10 For Emission Points AK-001 through AK-028, the permittee shall submit an annual certification acknowledging that the dried softwood lumber processed through the planer mill complies with the final target moisture content of twelve (12) percent or greater (based on a rolling 52-week average) no later than January 31 of each calendar year for the preceding year.

If the certification denotes non-compliance with the referenced final target moisture content limit, the permittee shall include with the annual certification an additional report that details the number of excursions experienced within the calendar year and the duration of each excursion experienced.

(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	Department of Environmental Quality
EPA	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
MMBTU/H	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
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
PM _{2.5}	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO ₂	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