

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT**

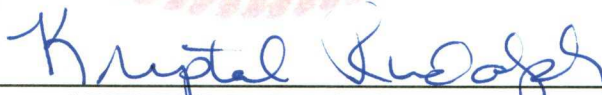
TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Scotch Plywood Company of Mississippi
110 Marshall Durbin Drive
Waynesboro, Wayne County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: MAR 18 2019

Permit No.: 2840-00014

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

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

2. Any activities not identified in the application are not authorized by this permit.

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

3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

4. It is the responsibility of the applicant / permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

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

7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

11. *Solids Removal:* The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

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

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the

upset;

- (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.):
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for 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 this 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.)

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

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

14. *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

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

15. *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

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

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

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

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

19. *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for 18 months or more.

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

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

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

21. *Beginning Operation:* Except as prohibited in Condition 24 of Section 1, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

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

22. *Application for a Permit to Operate:* Except as otherwise specified in Condition 24 of Section 1, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

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

23. *Operating Under a Permit to Construct:* Except as otherwise specified in Condition 24 of Section 1, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Operating Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

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

24. *Application Requirements for a Permit to Operate for Moderate Modifications:* For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD / NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

26. *Deviation Reporting:* 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. Said report shall be made within five (5) working days of the time the deviation began.

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

27. *Compliance Testing:* Regarding compliance testing:

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

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

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

B. GENERAL NOTIFICATION REQUIREMENTS

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

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

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

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

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

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

EMISSION POINT	DESCRIPTION
AB-001	25 MMBTU / Hour Natural Gas-Fired Boiler
AA-005	Log Soaking Operations [includes two (2) <u>new</u> soaking vats and four (4) existing soaking vats]

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Limitation(s) / Standard(s)
AB-001	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	$\leq 40\%$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.3	PM	$E = 0.8808 (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.4	SO ₂	4.8 pounds per MMBTU heat input
	40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial, Commercial, and Institutional Steam Generating Units 40 CFR 60.40c(a); Subpart Dc	3.5	SO ₂ PM	Applicability
	40 CFR 60.40c(c – d) and 40 CFR 60.41c; Subpart Dc	3.6		Emission Limit / Performance Testing / Monitoring Requirement Exemption

3.1 For Emission Point AB-001, 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 or industrial process on-site which exceeds forty percent (40%) opacity subject to the exceptions provided in (a) & (b) below:

- (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 percent (60%) 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 (1) one hour.

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

3.2 For Emission Point AB-001, the permittee shall not discharge into the ambient air from any point source or emissions, any contaminant of such opacity as to obscure an observer's

view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AB-001, the emission of ash and/or particulate matter (PM) from each boiler shall not exceed an emission rate as determined by the following relationship:

$$E = 0.8808 (I^{-0.1667})$$

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)(b).)

- 3.4 For Emission Point AB-001, except as otherwise specified or limited herein, the maximum discharge of sulfur oxides from the boiler unit shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per MMBTU heat input.

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

- 3.5 Emission Point AB-001 is subject and shall comply with applicable requirements within 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial, Commercial, and Institutional Steam Generating Units.

(Ref.: 40 CFR 60.40c(a); Subpart Dc)

- 3.6 For Emission Points AB-001, the permittee is not subject to any applicable pollutant emission limitations, performance testing requirements, or monitoring requirements promulgated by 40 CFR Part 60, Subpart Dc during periods of combustion research. Additionally, any temporary change to the boiler for the purpose of conducting combustion research is not considered a “*modification*” as specified by 40 CFR 60.14; Subpart A.

For the purpose of this permit, “*combustion research*” is defined as the experimental firing of any fuel or combination of fuels in the boiler for the purpose of conducting research and the development of more efficient combustion or more effective prevention / control of air pollutant emissions from combustion. During these periods of research and development, the heat generated shall not be used for any purpose other than pre-heating combustion air for use by the boiler (*i.e.*, the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

(Ref.: 40 CFR 60.40c(c – d) and 40 CFR 60.41c; Subpart Dc)

SECTION 4
WORK PRACTICES

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

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s)	Monitoring / Recordkeeping Requirement(s)
AB-001	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	40 CFR 60.48c(g)(2); Subpart Dc	5.2	SO ₂ PM	Monitor and Record the Amount of Natural Gas Combusted Monthly

5.1 For Emission Point AB-001, except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” or this permit upon request.

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

5.2 For Emission Point AB-001, the permittee shall monitor and record the volume [in cubic feet (ft³)] of natural gas combusted in the boiler monthly.

(Ref.: 40 CFR 60.48c(g)(2); Subpart Dc)

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
AB-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Submit Documents Certified by a Responsible Official or Duly Authorized Representative
	40 CFR 60.48c(a); Subpart Dc	6.2	Submit Notification of Initial Start-Up Date

6.1 For Emission Point AB-001, any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official or duly authorized representative stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

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

6.2 For Emission Point AB-001, the permittee shall notify the MDEQ in writing the initial start-up date of the boiler no later than thirty (30) days after the actual start-up date.

(Ref.: 40 CFR 60.48c(a); Subpart Dc)