

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Interfor US Inc, Bay Springs Division
71 Georgia Pacific Road
Bay Springs, Mississippi
Jasper 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) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Becky Simonsen

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Permit Issued: April 23, 2024

Effective Date: As specified herein.

Expires: March 31, 2029

Permit No.: 1300-00019

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance 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 This 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 provisions listed below.

(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 3 or more years. Such a reopening shall be completed no later than 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 emission 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 this permit shall follow the same procedures as apply to initial permit issuance and shall only affect 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 DEQ at least 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 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 This 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 permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual 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. 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.

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

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

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

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

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

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

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

- (e) If in disagreement with the calculation or applicability of the Title V permit 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.C.)

- 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 where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(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 pursuant to Section 112(r) of the Act to register such a plan.

(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 which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of 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. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the 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 (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

- (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 the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

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

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 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 Regulations 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 [a]ny 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 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or
- (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;
- (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 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

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

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source'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 Emergency Air Pollution Episode Alert imposed by the Executive Director 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 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 provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 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 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 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) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups 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 startup or shutdown, see the upset requirements above.

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

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

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility Wide (Interfor US, Inc. – Bay Springs Division)
AA-005	Log Sawing Operations
AA-006	Debarking Operations
AA-007	Bark Hog and Hog Screen
AA-008	Bark Truck Loading Operations [hogged bark from Bark Hog and Hog Screen is stored for loading and off-site transfer]
AA-009	Green Wood Chipping Operations and Green Chip Shaker Screen [consists of chopping activities for scrap logs, green dimensional lumber, end trim blocks, and sideboards]
AA-010	Chip Truck / Railcar Loading Operations [green wood chips from the Shaker Screen is stored for loading and off-site transfer]
AB-001	Dimensional Lumber Sawmill Operations [includes sawing (vertical and trim), chipping and green lumber sorting activities – <i>fugitive source</i>]
AB-002	No. 1 Continuous Direct-Fired Lumber Drying Kiln [equipped with a 35 MMBTU / hour dual fuel-fired (sawdust and natural gas) burner]
AB-004	No. 3 Continuous Direct-Fired Lumber Drying Kiln [equipped with a 35 MMBTU / hour dual fuel-fired (sawdust and natural gas) burner]
AB-005	Planer Mill [emissions are routed to a cyclone]
AB-006	Haul Roads [paved and unpaved – <i>fugitive source</i>]
AB-007A	350 HP (261 kW) Emergency Compression Ignition (CI) Diesel-fired Fire Pump Engine [max. heat input: 2.45 MMBTU / hour; manufactured date: 2022]
AB-007B	350 HP (261 kW) Emergency CI Diesel-fired Fire Pump Engine [max. heat input: 2.45 MMBTU / hour; manufactured date: 2022]
AB-009	Shavings Truck Loading Operations [shavings from the Planer Mill are stored for loading and off-site transfer]
AB-010	Green Sawdust Fuel Silo [stores green sawdust generated at the Dimensional Lumber Sawmill Operations for the two (2) Lumber Drying Kilns; emissions are routed to a cyclone]
AB-011	Sawdust Truck Loading Operations [green sawdust from the Shaker Screen and Dimensional Lumber Sawmill Operations is stored for loading and off-site transfer]

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) & (b).

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 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 For the entire facility, the permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable)	$E = 4.1(p^{0.67})$
AB-002 AB-004	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 (PSD BACT Limit)	3.B.2	Dried Lumber Throughput	230,000.0 MBF / Year (Rolling 12-Month Total; Combined Kilns)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 (PSD BACT Limits)	3.B.3	VOCs (as WPP1)	5.49 Pounds / MBF; and 631.40 tpy (Rolling 12-Month Total; Combined Kilns)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued October 24, 2022 (PSD BACT Limit)	3.B.4	Final Moisture Content	$\geq 12.0\%$ (Monthly Average)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in PSD Permit to Construct issued August 16, 2018	3.B.5	Fuel Source Restriction	Only Combust Uncontaminated Wood Waste and Natural Gas ≤ 10 Gallons of Liquid Fuel During Start-Up
	40 CFR Part 63, Subpart DDDD – NESHAP for Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.B.6	HAPs	General Applicability
	11 Miss. Admin. Code Pt, 2, R. 1.3.D.(1)(b).	3.B.7	PM (filterable)	$E = 0.8808 (I^{-0.1667})$
	AB-007A AB-007B	11 Miss. Admin. Code Pt, 2, R. 1.3.D(1)(a).	3.B.8	PM (filterable)
40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585(a), (b), and 63.6590(c)(6); Subpart ZZZZ		3.B.9	HAPs	General Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AB-007A AB-007B	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2); Subpart III	3.B.10	NMHC + NO _x PM	General Applicability
	40 CFR 60.4207(b); Subpart III	3.B.11	Fuel Requirement	15 ppm Sulfur Content (Max.); and 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4209(a); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.B.12	Hours of Operation	Install a Non-Resettable Hour Meter
	40 CFR 60.4211(f)(1) – (3); Subpart III	3.B.13	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
	40 CFR 60.4205(c) – Table 4, 60.4206, and 60.4211(c); Subpart III	3.B.14	NMHC + NO _x	4.0 g / kW-hr (or 3.0 g / HP-hr)
	PM		0.20 g / kW-hr (or 0.15 g / HP-hr)	

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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

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

3.B.2 For Emission Points AB-002 and AB-004, the permittee shall limit the total throughput of lumber dried in the collective kilns to no more than 230,000.0 thousand board feet

(MBF) (or 230.0 million board feet – MMBF) per year based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 – PSD BACT Limit)

- 3.B.3 For Emission Points AB-002 and AB-004, the permittee shall limit the emission of volatile organic compounds as determined by Wood Protocol 1 (VOCs as WPP1) from each kiln to no more than 5.49 pounds per MBF. Additionally, the permittee shall limit the total emission of VOCs (as WPP1) from the collective kilns to no more than 631.40 tons per year (tpy) based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 – PSD BACT Limits)

- 3.B.4 For Emission Points AB-002 and AB-004, the permittee shall limit the final moisture content of lumber dried within kiln to at least twelve (12.0) percent based on a monthly average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued October 24, 2022 – PSD BACT Limit)

- 3.B.5 For Emission Points AB-002 and AB-004, the permittee shall only combust uncontaminated wood waste and natural gas within each kiln burner as a primary fuel source. For the purpose of this permit, “uncontaminated wood waste” is defined as any by-product generated from processing harvested timber/ dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue. The permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition.

Additionally, the permittee shall utilize no more than ten (10) gallons of diesel to ignite a fuel bed within a kiln burner during any start-up period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued August 16, 2018)

- 3.B.6 For Emission Points AB-002 and AB-004, the permittee is subject to and comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 10 of Subpart DDDD).

For the purpose of this permit, Emission Points AB-002 and AB-004 are only subject to an initial notification requirement. As this requirements has been satisfied, no further actions are required.

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

- 3.B.7 For Emission Points AB-002 and AB-004, the maximum emission of ash and/or PM from the burners within each lumber kiln when combusting a fossil fuel shall not exceed an emission rate as determined by the relationship:

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

where “E” is the emission rate in pounds per million BTU (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.B.8 For Emission Points AB-007A and AB-007B, the maximum permissible emission of ash and/or PM from any fossil fuel burning installations with a heat input of less than ten (10) million BTU (MMBTU) per hour shall not exceed 0.6 pounds per MMBTU heat input.

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

- 3.B.9 For Emission Points AB-007A and AB-007B, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 8 of Subpart ZZZZ).

For the purpose of this permit, stationary RICE is classified as “new” if construction or reconstruction commenced on / after June 12, 2006.

For new compression-ignition RICE (Emission Points AB-007A and AB-007B), the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements in 40 CFR Part 60, Subpart IIII. No further requirements apply for such engines under Subpart ZZZZ.

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

- 3.B.10 For Emission Points AB-007A and AB-007B, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required by Table 8 of Subpart IIII).

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

3.B.11 For Emission Points AB-007A and AB-007B, the permittee shall only combust diesel fuel within each engine that meet the following requirements (on a per-gallon basis):

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

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

3.B.12 For Emission Points AB-007A and AB-007B, the permittee shall install a non-resettable hour meter on each engine regardless of whether the permittee is required to do so by a Federal Regulation.

(Ref.: 40 CFR 60.4209(a); Subpart IIII and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).)

3.B.13 For Emission Points AB-007A and AB-007B, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. Except as specified in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

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

3.B.14 For Emission Points AB-007A and AB-007B, the permittee shall purchase engines certified to the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
- (b) Particulate Matter (PM): 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain the engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, 60.4211(c), and Table 4; Subpart III)

C. Insignificant and Trivial Activity Emission Limitations & Standards

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

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than 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(s)	Pollutant/Parameter	Limit/Standard
AB-002 AB-004	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 (PSD BACT Standard)	3.D.1	VOCs	Maintain a Good Work Practices Plan
AB-007A AB-007B	40 CFR 60.4211(a); Subpart III	3.D.2	NMHC + NO _x PM	Perform Compliance Practices

3.D.1 For Emission Points AB-002 and AB-004, the permittee shall maintain a “Good Work Practices Plan” (Received on January 30, 2024) that establishes work practice standards in accordance with the manufacturer’s recommendations for continuous direct-fired kiln operations. The permittee shall perform all inspections and maintenance actions on the schedule specified in the plan. However, if any problem is noted during an inspection, the permittee shall perform the necessary corrective maintenance to ensure the operation of the kiln as originally designed.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued August 16, 2018 and modified October 24, 2022 – PSD BACT Standard)

3.D.2 For Emission Points AB-007A and AB-007B, the permittee shall demonstrate compliance with the emission standards specified in Conditions 3.B.14 by performing the following work practices:

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

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 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:
- (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), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

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

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

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. 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 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 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 (i.e., April

30th, July 31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1), 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. Said report shall be made within five (5) working days of the time the deviation began.

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

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

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

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

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

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

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

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AB-002 AB-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	Dried Lumber Throughput VOCs	Monitor the Total Throughput and Total Emissions from the Combined Kilns (Monthly and 12-Month Rolling Total)
		5.B.2	VOCs	Recordkeeping Requirements for Good Work Practices Plan
		5.B.3	Final Moisture Content	Continuously Monitor the Moisture Content of Dried Lumber Processed through the Planer Mill Determine the Average Moisture Content (Monthly)
AB-005	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	PM (filterable) PM ₁₀ (filterable + condensable)	Performance Test Requirements
AB-005 AB-010	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	PM / PM ₁₀ / PM _{2.5} (filterable)	Conduct Monthly Inspections on the Cyclones
		5.B.6	Opacity	Conduct a Visible Emission Observation Biweekly
AB-007A AB-007B	40 CFR 60.4214(b); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.7	Emergency Engine Status	Monitor Hours of Operations Monthly (Emergency and Non-Emergency)
	40 CFR 60.4214(a)(2)(i) – (iii); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.8	NMHC + NO _x PM	Recordkeeping Requirements
	40 CFR 60.4211(g)(2); Subpart III	5.B.9		Perform Compliance Actions (As Applicable)

5.B.1 For Emission Points AB-002 and AB-004, the permittee shall demonstrate compliance with the limitation specified in Condition 3.B.2 by monitoring and recording the total throughput of lumber dried within the combined kilns in thousand board feet (MBF) on both a monthly and rolling 12-month total basis.

Additionally, the permittee shall utilize the throughput data and the emission factor specified in Condition 3.B.3 to calculate and record the total emission of volatile organic compounds (VOCs) from the combined kilns both a monthly and a 12-month rolling total basis.

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

- 5.B.2 For Emission Points AB-002 and AB-004, the permittee shall maintain documentation that details the results of each inspection and/or maintenance action (preventative or unscheduled) performed on each kiln in accordance with the “Good Work Practices Plan” required by Condition 3.D.1.

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

- 5.B.3 For Emission Points AB-002 and AB-004, the permittee shall demonstrate compliance with the moisture content limitation specified in Condition 3.B.4 by continuously monitoring and maintaining the moisture of dried lumber processed in the planer mill area in order to determine an average final moisture content on a monthly basis.

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

- 5.B.4 For Emission Point AB-005, the permittee shall evaluate the emission of particulate matter (PM) and particulate matter less than ten microns (PM₁₀) by conducting a routine performance test once every five (5) years [and no later than sixty (60) months after the previously completed test]. The permittee shall conduct the performance testing in accordance with the following requirements:

- (a) Each test shall be conducted in accordance with an applicable EPA Test Method found in Appendix A of 40 CFR Part 60 and Appendix A of 40 CFR Part 63, or an alternative test method approved by the EPA prior to the testing event;
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance test for a duration of at least one (1) hour;

As applicable, the permittee shall conduct a performance stack test at representative operating conditions. Operations during periods of start-up, shutdown, or nonoperation do not constitute “representative operating conditions”. The permittee may not conduct performance tests during periods of malfunction. The permittee shall monitor and record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation;

- (c) The MDEQ may require the permittee to conduct a subsequent performance stack test if the heat input rate of the unit increases by more than ten percent (10%) of the average rate established during the previously completed test; and

- (d) The permittee shall perform and record a visible emission evaluation (VEE), in accordance with EPA Test Method 9, in conjunction with the PM / PM₁₀ testing for a period of three (3) hours (i.e. 30 six-minute averages). If visibility or other conditions prevent the opacity observations from being performed concurrently with the performance testing, the permittee shall reschedule the opacity observations as soon after the performance testing as possible, but no later than thirty (30) days thereafter, and shall notify the MDEQ of the rescheduled date. The rescheduled opacity observations shall be conducted (to the extent possible) under the same operating conditions that existed during the stack test.

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

- 5.B.5 For Emission Points AB-005 and AB-010, the permittee shall perform an inspection that evaluates the performance capability of each cyclone on a monthly basis. 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 a 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 a 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.6 For Emission Points AB-005 and AB-010, the permittee shall demonstrate compliance with the opacity limitations outlined in Conditions 3.A.1 and 3.A.2 by performing visible emission observations in accordance with EPA Test Method 22 on the exhaust of each source on a biweekly (once within a two week period) basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emissions evaluations (VEE) in accordance with EPA Test Method 9. However, in lieu of performing a VEE, the permittee may assume that the visual opacity of emissions from a source exceed the applicable limitation and immediately implement corrective actions.

In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanations as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by Method 22 and/or Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted.

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

- 5.B.7 For Emission Points AB-007A and AB-007B, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(b); Subpart III and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.8 For Emission Points AB-007A and AB-007B, the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted to comply with Subpart III;
- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that indicate an engine is certified to meet the emission standards specified in Conditions 3.B.14.

(Ref.: 40 CFR 60.4214(a)(2)(i) – (iii); Subpart III)

- 5.B.9 For Emission Point AB-007A and AB-007B, the permittee shall demonstrate compliance through the emission standards specified in Condition 3.B.14 through the following actions **if** the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

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

Any required performance test shall be conducted in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart IIII (as applicable).

(Ref.: 40 CFR 60.4211(g)(2); Subpart IIII)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	Lumber Throughput VOCs Moisture Content Cyclone Maintenance Hours of Operation (Emergency Engines)	Submit a Semi-Annual Monitoring Report
AB-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.2	PM (filterable) PM ₁₀ (filterable + condensable)	Stack Test Reporting Requirements

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

- (a) For Emission Points AB-002 and AB-004, the total throughput (in thousand board feet) of lumber dried by the combined kilns on both a monthly and rolling 12-month total basis;
- (b) For Emission Points AB-002 and AB-004, the total emission of volatile organic compounds (VOCs) from the combined kilns both on a monthly and rolling 12-month total basis;
- (c) For Emission Points AB-002 and AB-004, an overview on any revisions that have been made to the “Good Work Practices Plan”;
- (d) For Emission Points AB-002 and AB-004, the average moisture content of all dried lumber processed on a monthly basis; and
- (e) For Emission Points AB-005 and AB-010, an overview on any maintenance (either corrective or preventative) conducted on the cyclone.
- (f) For Emission Points AB-007A and AB-007B, the hours of operation for each emergency engine (including a summary on how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation).

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

- 5.C.2 For Emission Point AB-005, the permittee shall submit the following notifications, information, and reports for the performance testing required by Condition 5.B.4:
- (a) A written performance test protocol that details the procedures and test methods that will be implemented during the actual testing event shall be submitted no later than thirty (30) days prior to the intended testing date(s). If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date(s) to discuss the proposed test methods and procedures outlined in the protocol;
 - (b) A notification about the testing event shall be submitted at least ten (10) days prior to the intended testing date(s) so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.
 - (c) The test results from the performance test shall be submitted no later than sixty (60) days after completing the actual test. The report shall include a summary of the results of any required periodic and/or parametric monitoring recorded during a performance test (e.g. planer mill throughput).

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 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