

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

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Southeastern Timber Products LLC, Ackerman Plant
240 PCA Road
Ackerman,
Choctaw, Mississippi

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 11, 2019

Permit No.: 0400-00005

Modified:

2014 PER20240003

Draft/Proposed

SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.2 Any activities not identified in the application are not authorized by this permit.
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.3 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.4 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.5 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.6 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.7 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.8 The permit does not convey any property rights of any sort, or any exclusive privilege.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.9 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the 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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 2.2.B(15)(d).)

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

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

- 1.11 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

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

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

- 1.13 *General Nuisances:* The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 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.)

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

- (a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

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

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

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

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

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

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

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

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

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

- 1.19 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.20 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.21 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.22 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.23 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable 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;
 - (i) The source was at the time being properly operated;
 - (ii) 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;
 - (iii) 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;
 - (iv) 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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

- 1.25 *General Duty:* All air emission equipment shall be operated as efficiently as possible to minimize emissions of air contaminants.

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

- 1.26 *Compliance Testing:* Regarding compliance testing:

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

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

SECTION 2. EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-000	Facility-Wide (Southeastern Timber Products, LLC – Ackerman Plant)
AA-011	No. 4 Continuous Direct-Fired Lumber Drying Kiln (CDK-4) [equipped with 46 MMBTU / hour natural gas-fired burner]
AA-012	No. 5 Continuous Direct-Fired Lumber Drying Kiln (CDK-5) [equipped with 46 MMBTU / hour natural gas-fired burner]
AA-016	Planer Mill Cyclofilter
AA-017	No. 6 Continuous Direct-Fired Lumber Drying Kiln (CDK-6) [equipped with 46 MMBTU / hour natural gas-fired burner]
AA-020	Haul Roads

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-001 AA-002 AA-003 AA-004 AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.1	VOCs PM/ PM ₁₀ / PM _{2.5}	Existing Process Unit Decommission Requirements
AA-011 AA-012 AA-016 AA-017	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.2	VOCs PM/ PM ₁₀ / PM _{2.5}	New Process Unit Shakedown Requirements
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.3	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.4		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.5	PM (filterable)	E = 4.1(p ^{0.67})
AA-011 AA-012 AA-017	40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR 63.2231(a), (b), 63.2233(a)(2), and 63.2252; Subpart DDDD	3.6	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	3.7	VOCs	Install, Operate, Calibrate, and Maintain According to Manufacturer's Specifications
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limits)	3.8	VOCs	4.74 lb./MBF 853.2 tpy (Combined Kilns; Rolling 12-Month Total)
		3.9	Dried Lumber Throughput	360,000 MBF/Year (Combined Kilns; Rolling 12-Month Total)
		3.10	Final Moisture Content	≥ 12% (Rolling 12-Month Average)
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.11	PM	E = 0.8808(I ^{-0.1667})
AA-016	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.12	PM/ PM ₁₀ / PM _{2.5}	Install, Operate, Calibrate, and Maintain According to Manufacturer's Specifications
AA-020	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (PSD Avoidance Limit)	3.13	PM	Emissions Control Requirement

- 3.1 For Emission Points AA-002, AA-003, AA-004 and AA-007 (Batch Direct-Fired Kilns and Fuel Bin Cyclones), the permittee shall decommission the two (2) batch direct-fired lumber drying kilns and the two (2) existing dry shavings fuel bin cyclones no later than thirty (30) days after completing the respective shakedown for the No. 4 and No. 5 continuous direct-fired lumber drying kilns (i.e. Emission Points AA-011 and AA-012).

For Emission Points AA-001 and AA-009 (Continuous Direct-Fired Kiln and Fuel Bin Cyclone), the permittee shall decommission the continuous direct-fired lumber drying kiln No. 3 and green sawdust fuel bin cyclone no later than thirty (30) days after completing the shakedown for the No. 6 continuous direct-fired lumber drying kiln (i.e. Emission Point AA-017).

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

- 3.2 For Emission Points AA-011, AA-012, AA-016 and AA-017 (Continuous Direct-Fired Kilns and Planer Cyclofilter), the permittee may execute a shakedown of the noted continuous direct-fired lumber drying kilns and planer cyclofilter that shall not exceed more than one hundred eighty (180) days after the start-up of each process unit.

For the purpose of this permit, “shakedown” shall be defined as the period beginning with start-up and ending no later than the successful completion of performance testing (as applicable), during which the permittee may conduct operational and contractual testing / tuning to ensure the safe, efficient, and reliable operation of the new kiln and cyclofilter.

A process unit shall be considered operational after completion of the shakedown period.

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

- 3.3 For Emission Points AA-011 AA-012, AA-016 and AA-017 (Continuous Direct-Fired Kilns and Planer Cyclofilter), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke into the open air from a point source or any manufacturing / industrial process on-site that exceeds forty percent (40%) opacity subject to the exceptions provided as follows:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing (i.e. ash removal) operations shall be permitted provided such emissions do not exceed 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 hour.

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

- 3.4 For Emission Points AA-011 AA-012, AA-016 and AA-017 (Continuous Direct-Fired Kilns and Planer Cyclofilter), the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.5 For Emission Points AA-011 AA-012, AA-016 and AA-017 (Continuous Direct-Fired Kilns and Planer Cyclofilter), except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

Where "E" is the emission rate in pounds per hour and "p" is the process weight input rate in tons per hour.

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

- 3.6 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

For the purpose of this permit, Emission Points AA-011, AA-012, and AA-017 are only subject to an initial notification requirement, which has been satisfied.

(Ref.: 40 CFR 63.2231(a), (b), 63.2233(a)(2), and 63.2252; Subpart DDDD)

- 3.7 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), the permittee shall install, operate, calibrate, and maintain the kilns in accordance with the manufacturer's specifications and recommendations.

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

- 3.8 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), the permittee shall limit the emission of volatile organic compounds (VOCs) as determined by Wood Products Protocol 1 (WPP1) from each lumber drying kiln to no more than 4.74 pounds per thousand board feet (MBF).

Additionally, VOC emissions from the combined lumber drying kilns shall not exceed 853.2 tons per year (tpy) based on a rolling 12-month total.

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

- 3.9 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), the permittee shall limit the throughput of lumber dried in the combined lumber drying kilns to no more than 360,000 thousand board feet (MBF) [or 360 million board feet (MMBF)] per year based on a rolling 12-month total.

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

- 3.10 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), the permittee shall limit the final moisture content of dried lumber produced within each lumber drying kiln to 12% or greater.

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

- 3.11 For Emission Points AA-011, AA-012, and AA-017 (Continuous Direct-Fired Kilns), while burning natural gas, the maximum permissible emission of ash and/or PM from a fossil fuel burning installation with a heat input equal to or greater than ten (10) MMBTU per hour but less than 10,000 MMBTU per hour shall not exceed an emission rate as determined by the 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).)

- 3.12 For Emission Point AA-016 (Planer Mill Cyclofilter), the permittee shall install, operate, calibrate, and maintain the cyclofilter in accordance with the manufacturer’s specifications and recommendations.

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

- 3.13 For Emission Point AA-020 (Haul Roads), the permittee shall maintain adequate base course coverage on the haul roads going in and out of the site to minimize the emission of particulate matter (PM). This condition shall demonstrate compliance with the sixty percent (60%) control efficiency used in the calculation of emissions from haul roads.

For the purpose of the permit, “base course” is defined as a loose aggregation of rock fragments (i.e. gravel).

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

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	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AA-011 AA-012 AA-017	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	5.2	VOCs	Develop, Implement, and Maintain a Work Practice Standards Plan
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Dried Lumber Throughput	Monitor Throughput of Dried Lumber from Combined Kilns (Monthly and Rolling 12-Month Total)
		5.4	Final Moisture Content	Monitor Moisture Content of Dried Lumber Processed in Planer Mill Area (Rolling 12-Month Average)
		5.5	Hours of Duration	Monitor Date, Time, and Duration of Start-Up and Shutdown Period Monthly
AA-016	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Differential Pressure Drop	Monitor and Record the Differential Pressure Drop (Daily)
		5.7	Opacity	Perform Monthly Visible Emissions Observations / Evaluations
		5.8	PM/ PM ₁₀ / PM _{2.5}	Perform Monthly Maintenance Inspections
AA-020	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	PM	Perform Monthly Visual Inspections

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ 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 Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall develop, implement, and maintain a plan that establishes work practice standards in accordance with the manufacturer's specifications for continuous direct-fired

kiln operations. The plan shall establish a routine for conducting preventative maintenance on the kilns that includes, at a minimum, the following actions:

- (a) Conducting walk-around inspections;
- (b) Confirming proper wet-bulb operation;
- (c) Conducting entrance / exit baffle inspections;
- (d) Checking wet-bulb wicks for integrity;
- (e) Greasing the kiln cart wheels and fan shaft bearings;
- (f) Checking hydraulic oil levels;
- (g) Calibrating moisture content equipment;
- (h) Calibrating temperature probe equipment;
- (i) Conducting gasifier burner clean-outs;
- (j) Checking for leaks in kiln pipe-work; and
- (k) Checking shaft seals at wall penetrations (if applicable).

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

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

- 5.3 For Emission Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall monitor and record the total throughput of lumber dried from the combined kilns in thousand board feet (MBF) both on a monthly and a rolling 12-month total basis.

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

- 5.4 For Emission Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall demonstrate compliance with the moisture content limit specified in Condition 3.10 by monitoring and recording the moisture content of dried lumber that is processed through the planer mill on a rolling 12-month average.

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

- 5.5 For Emission Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall monitor and record the date, time, and duration of every start-up and shutdown period experienced by each kiln (in which emissions are diverted to the corresponding abort stack) monthly.

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

- 5.6 For Emission Point AA-016 (Planer Mill Cyclofilter), the permittee shall monitor and record the differential pressure drop on the cyclofilter daily.

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

- 5.7 For Emission Point AA-016 (Planer Mill Cyclofilter), the permittee shall have personnel certified in Visible Emission Evaluations (VEE) under EPA Test Method 9 perform and record a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each cyclone during daylight hours and during representative operating conditions for each cyclone.

If visible emissions are detected during an observation period from a cyclone, a VEE shall then be performed and recorded in accordance with EPA Test Method 9. If the visible emissions after a period of six (6) consecutive minutes are determined to be less than twenty percent (20%) opacity, the permittee may discontinue the VEE. In the event that a VEE is required but cannot be conducted on a denoted cyclone, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations / evaluations were conducted.

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

- 5.8 For Emission Point AA-016 (Planer Mill Cyclofilter), the permittee shall perform a monthly inspection on the cyclofilter. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of the cyclofilter.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return the cyclofilter to operation as originally designed, and any periods of time (including date and duration) in which the cyclofilter was non-operational during active operations.

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

- 5.9 For Emission Point AA-020 (Haul Roads), the permittee shall perform and record a monthly visual inspection of the haul roads going in and out of the site to evaluate the overall base course coverage.

If a haul road is found to possess inadequate base course coverage during an inspection, the permittee shall conduct and record the necessary maintenance action(s) to ensure

compliance with the control efficiency specified in Condition 3.13 no later than seven (7) days after the corresponding inspection.

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

SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report Deviations Within Five (5) Working Days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Semiannual Reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of Beginning Actual Construction Within 15 Days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification When Construction Does Not Begin or is Suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of Completion of Construction Prior to Operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of Changes in Construction
AA-001 AA-002 AA-003 AA-004 AA-007 AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit Notification of Completed Decommission Activities for Existing Process Units
AA-011 AA-012 AA-017	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	Submit Notification of Initial Start-Up for New Process Units Submit Notification of Shakedown Period Completion
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit Semi-Annual Report of Dried Lumber Throughput (from Combined Kilns)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit the Average Moisture Content (for Combined Kilns)
		6.6	Submit Work Practice Standards Plan Submit Semi-Annual Notification of Amendment to Work Practice Standards Plan
		6.7	Submit Semi-Annual Report on Kilns not Operating in Accordance with Manufacturer's Specifications
AA-016	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.8	Submit Semi-Annual Report of Visible Emission Evaluations

6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. 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(11).)
- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31st and January 31st 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. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- (e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)
- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If

the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

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

- 6.2 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-007, and AA-009 (Lumber Kilns and Fuel Bin Cyclones), the permittee shall notify the MDEQ in writing on the completed decommission of the lumber drying kilns and fuel bin cyclones no later than fifteen (15) days after the respective decommission date(s).

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

- 6.3 For Emission Points AA-011, AA-012 and AA-017 (Continuous Direct-Fired Kilns), the permittee shall notify the MDEQ in writing about the following periods no later than fifteen (15) days after the actual respective dates:

- (a) The start-up of each new kiln; and
- (b) The completion of the shakedown period for each kiln.

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

- 6.4 For Emission Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall submit a semi-annual report in accordance with Condition 6.1(b) that details the total throughput of lumber dried from the combined lumber kilns in thousand board feet (MBF) both on a monthly and a rolling 12-month total basis.

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

- 6.5 For Emission Points AA-011, AA-012 and AA-017, (Continuous Direct-Fired Kilns), the permittee shall submit a semi-annual report in accordance with Condition 6.1(b) that details the average moisture content of dried lumber for the previous 12 months.

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

- 6.6 For Emission Points AA-011, AA-012 and AA-017 (Continuous Direct-Fired Kilns), the permittee shall submit the initial Work Practice Standards Plan required by Condition 5.2 to the MDEQ no later than sixty (60) days after certifying completion of construction.

Thereafter, the permittee shall submit a semi-annual report in accordance with Condition 6.1(b) that summarizes any revision(s) made to the maintenance and inspection. If an amendment is made to the plan in any six-month period, the permittee shall include the revision(s) within the corresponding semi-annual monitoring report. If no amendment has been made during a six-month period, the permittee shall make a negative declaration detailing such in the corresponding semi-annual monitoring report.

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

- 6.7 For Emission Points AA-011, AA-012 and AA-017 (Continuous Direct-Fired Kilns), the permittee shall submit a semi-annual report in accordance with Condition 6.1(b) that details any occurrence (and its corresponding duration) of the kiln not operating in accordance with established work practice standards and/or the manufacturer's specifications.

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

- 6.8 For Emission Point AA-016 (Planer Mill Cyclofilter), the permittee shall submit a semi-annual report in accordance with Condition 6.1(b) that details (at a minimum) the following information:

- (a) The results and corresponding information from any conducted visual emission evaluation (VEE);
- (b) Any occurrence and corresponding duration in which the cyclofilter malfunctions and/or becomes non-operational; and
- (c) An outline of any maintenance action(s) performed to restore the cyclofilter to its normal manner of operation.

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