

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

**TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE**

THIS CERTIFIES THAT

Inca Presswood Pallets, Ltd.
2333 South Frontage Road
Sardis Industrial Park
Sardis, Panola County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued: _____

Permit No.: 2100-00016

Effective Date: As specified herein.

Expires: [No more than 5 years from the issue date.]

Draft/Proposed – 7/17/2020

SECTION 1

A. GENERAL CONDITIONS

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.4.D.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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 constructing or operating without a valid permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(5).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(a).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality (MDEQ) Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

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

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

9. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the MDEQ Office of Pollution Control.

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

10. 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. 2.1.D.(7).)

11. This permit does not authorize a modification as defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – *Permit Regulations for the Construction and/or Operation of Air Emission Equipment*. A modification may require a Permit to Construct and a modification of this permit.

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

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166; or
 - (1) 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 Part 51 – 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).)

B. GENERAL OPERATIONAL CONDITIONS

- 1. Should the Executive Director of the MDEQ 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – *Regulations for the Prevention of Air Pollution Emergency Episodes* for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

- 2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1 – *Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants*.

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

- 3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a.(i – ii))

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

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

- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Rule 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.)

5. *Compliance Testing*: Regarding compliance testing (as applicable):

- (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).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

- 1. For renewal of this permit, the applicant shall make application not less than one hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board.

If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate

the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

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

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

3. 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).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - (a) Persistent violation of any 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.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

SECTION 2 EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AA-100	Facility-Wide (Inca Presswood Pallets, Ltd.)
AA-001	Rotary Wood Chip Dryer System [equipped with a 16 MMBTU/hour wood waste-fired burner (primary) and a 21 MMBTU/hour natural gas-fired burner (back-up); emissions are routed to a multiclone]
AA-002	4.2 MMBTU/Hour Dual Fuel-Fired Boiler [wood waste is the primary fuel source and natural gas is the back-up fuel source; emissions are routed to a multiclone; constructed in 1989]
AA-003	Pallet / Core Plug Deflasher [routing of pallet/core plug edges to remove excess material; equipped with a baghouse]
AA-004	Wood Chip Hammermill [for size reduction of wood chips for processing; equipped with a cyclone]
AA-005	Presswood Pressing / Cooling Operation [to form and store pallets / core plugs]
AA-006	One (1) 14-Gallon Parts Washer [uses cold solvent for general cleaning of grease]
AA-007	Eleven (11) Natural Gas-Fired Space Heaters [heat input capacities totaling 8.53 MMBTU/hour]
AA-008	600-Gallon Diesel Fuel Oil Storage Tank
AA-009	Wood Waste Grinder [for boiler fuel and process reuse]

SECTION 3 EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	$\leq 40\%$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.3	PM (filterable only)	95.0 tpy (12-month rolling total)
			PM ₁₀ (filterable + condensable)	95.0 tpy (12-month rolling total)
AA-001 through AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.4	PM / PM ₁₀	Do Not Bypass Air Pollution Control Devices
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.5	Fuel Source Restriction	Only Combust Uncontaminated Wood Waste, Particleboard Waste, MDF Waste, or Natural Gas
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).	3.6	PM	0.30 Grains / Standard Cubic Feet
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.4.B.(1).	3.7	SO ₂	500 Parts Per Million (by volume)
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.8	SO ₂	4.8 Pounds / MMBTU
	40 CFR 63, Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.	3.9	HAPs	General Applicability
	40 CFR 63.11194, Subpart JJJJJ			
AA-003 AA-004 AA-005 AA-009	11 Miss. Admin. Code Pt. 2, R. 1.3. F(1).	3.10	PM	$E = 4.1 (p^{0.67})$

- 3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing or industrial process, which exceeds forty percent (40%) opacity subject to the exceptions provided in (a) and (b) below:
- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (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 operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided that the aggregate duration of such emissions during any 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.)

- 3.2 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of forty percent (40%) opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the total respective emission of particulate matter (PM; filterable only) and particulate matter less 10 μm (PM₁₀; filterable + condensable) each to no more than 95.0 tons per year (tpy) based on a 12-month rolling total.

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

- 3.4 For Emission Points AA-001 through AA-004, the permittee shall not allow emissions to bypass an air pollution control device associated with a process unit. In the event a control device malfunctions or becomes non-operational, the permittee shall cease operations at the associated process unit until such time when repairs can be made to return the control device to its normal operational state.

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

- 3.5 For Emission Points AA-001 and AA-002, the permittee shall only combust the following fuel sources:

- (a) Uncontaminated wood waste;
- (b) Particleboard waste, which shall include chipped presswood product;

- (c) Medium density fiberboard (MDF) waste; or
- (d) Natural gas.

Any particleboard waste or MDF waste used as a fuel source shall be limited to products derived from a combination wood and urea-formaldehyde resin-based adhesives.

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

- 3.6 For Emission Point AA-001 and AA-002, which may conduct fuel-burning operations utilizing a mixture of combustibles to produce a heat transfer medium through indirect means, the permittee may be allowed to emit particulate matter (PM) up to 0.30 grains per standard cubic foot.

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

- 3.7 For Emission Point AA-001, except as otherwise provided herein, the permittee shall not cause the emission of gas containing sulfur oxides (measured as sulfur dioxide – SO₂) in excess of 500 parts per million (by volume).

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

- 3.8 For Emission Points AA-002, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

- 3.9 Emission Point AA-002 is subject to and shall comply with all the applicable standards and provisions found in 40 CFR 63, Subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

For the purpose of this subpart, Emission Point AA-002 is considered a “*biomass*” boiler.

(Ref.: 40 CFR 63.11194, Subpart JJJJJ)

- 3.10 For Emission Points AA-003 through AA-005 and AA-009, 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. 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).)

SECTION 4

WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Work Practice Standard
AA-002	40 CFR 63.11205(a); Subpart JJJJJ	4.1	HAPs	General Duty Clause
	40 CFR 63.11223(b) and 63.1125(c)(2)(i), Subpart JJJJJ	4.2	CO HAPs	Conduct a Biennial Performance Tune-up

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

The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of each boiler.

(Ref.: 40 CFR 63.11205(a); Subpart JJJJJ)

- 4.2 For Emission Point AA-002, the permittee shall conduct a performance tune-up on each boiler biennially no later than twenty-five (25) months after the previously completed tune-up. Each tune-up shall be conducted in accordance with the following provisions:
- (a) Inspect the burner (as applicable) and clean / replace any components of the burner as necessary. A burner inspection may be delayed until the next boiler shutdown but shall not to exceed thirty-six (36) months after the previous inspection.
 - (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. An adjustment should be consistent with the manufacturer's specifications (if available).
 - (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. An inspection may be delayed until the next boiler shutdown but shall not to exceed 36 months after the previous inspection.
 - (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxide (NO_x) requirement to which a boiler is subject.

- (e) Measure the concentrations in the effluent stream of CO in parts per million by volume (ppm_v) and oxygen (O₂) in volume percent (vol.%) before and after the adjustments are made. The measurements may be either on a wet or dry basis as long as the basis remains the same before and after the adjustments are made. The measurements may be taken using a portable CO analyzer.
- (f) The permittee shall document and maintain on-site the following information collected during a tune-up:
 - (1) The date of the tune-up;
 - (2) The procedures followed for the tune-up;
 - (3) The manufacturer's specifications to which the boiler was tuned;
 - (4) The concentration of CO in the effluent stream in ppm_v and O₂ in vol.% measured at high fire or the typical operating load before and after the tune-up of a boiler;
 - (5) A description of any corrective action taken as a part of the tune-up of a boiler; and
 - (6) The type and amount of fuel used over the last twelve (12) months prior to tune-up of a boiler but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- (g) If a boiler is not operating on the required date for the tune-up, the permittee shall conduct the tune-up within thirty (30) days of start-up.

(Ref.: 40 CFR 63.11223(b) and 40 CFR 63.11225(c)(2)(i); Subpart JJJJJ)

SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records For a Minimum of Five (5) Years
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	PM (filterable only) PM ₁₀ (filterable + condensable)	Calculate and Record Emissions (Monthly and 12-Month Rolling Totals)
		5.3	Presswood Product Throughput	Monitor and Record the Throughput of Presswood Product Manufactured (Monthly and 12-Month Rolling Total)
AA-001 through AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	Opacity	Perform and Record Monthly Visible Emission Observations
		5.5	PM / PM ₁₀	Perform and Record Monthly Inspections on Air Pollution Control Devices
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.7	Wood Chip Throughput	Calculate and Record the Throughput Wood Chips Dried (Monthly and 12-Month Rolling Total)
AA-002	40 CFR 63.11225(c)(4) and (5), Subpart JJJJJ	5.8	HAPs	Record Information About Periods of Boiler Malfunction

- 5.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified or limited herein, the permittee shall retain all required records, monitoring data, supporting information, and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings or other data from continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by “Applicable Rules and Regulations” of this permit upon request.

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

- 5.2 For Emission Points AA-100 (Facility-Wide), the permittee shall calculate and record the total emission of particulate matter (PM; filterable only) and particulate matter less than 10 µm (PM₁₀; filterable + condensable) in tons both on a monthly basis and on a 12-month rolling total.

Unless otherwise specified herein, the permittee shall include all reference data utilized to calculate emissions (*e.g.* operational data, applicable emission factors, engineering judgement determinations, etc.).

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

- 5.3 For Emission Point AA-100 (Facility-Wide), the permittee shall monitor and record the throughput of presswood product manufactured in tons on a monthly basis and on a 12-month rolling total.

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

- 5.4 For Emission Points AA-001 through AA-005, the permittee shall perform and record a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each process unit during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, a visible emission evaluation (VEE) in accordance with EPA Test Method 9 shall then be performed and recorded by certified personnel. The overall VEE observation period shall consist of (at a minimum) six (6) consecutive minutes. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations were conducted.

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

- 5.5 For Emission Points AA-001 through AA-005, the permittee shall perform and record an inspection of the air pollution control devices on a monthly basis to note any required maintenance.

If a problem is noted with a control device during an inspection, the permittee shall perform the necessary maintenance on the device to ensure operation as originally designed. Additionally, the permittee shall maintain on-site sufficient components as is necessary to repair the device.

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

- 5.7 For Emission Point AA-001, the permittee shall calculate and record the throughput of wood chips dried (as determined by the corresponding throughput of presswood pallets manufactured) in tons on both a monthly basis and a 12-month rolling total. The

throughput of dried wood chips shall be based on an oven-dried ton. An “*oven-dried ton*” equates to a ton of wood at zero percent (0%) moisture.

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

5.8 For Emission Point AA-002, the permittee shall record the following information for the boiler about periods of malfunction:

- (a) Any occurrence and the corresponding duration of each malfunction, or the associated air pollution control / monitoring equipment; and
- (b) Any action taken during periods of malfunction to minimize emissions in accordance with Condition 4.1, which includes corrective actions to restore the malfunctioning boiler or the associated air pollution control / monitoring equipment to its normal / usual manner of operation.

(Ref.: 40 CFR 63.11225(c)(4) and (5); Subpart JJJJJ)

SECTION 6 REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Permit Deviations Within Five (5) Working Days
		6.2	Submit a Certified Annual Monitoring Report (AMR)
		6.3	All Documents Submitted the MDEQ Shall be Certified by a Responsible Official
		6.4	Submit Production Information in the AMR
AA-001 through AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit a Summary on Maintenance Actions for Air Pollution Control Devices in the AMR
AA-002	40 CFR 63.11225(b)(1) – (2); Subpart JJJJJ	6.6	Submit a Biennial Certification of Compliance

- 6.1 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 action(s) and/or preventive measures taken. The report shall be submitted to the MDEQ within five (5) working days of the time the deviation began.

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

- 6.2 Except as otherwise specified herein, the permittee shall submit an annual monitoring report postmarked no later than January 31st of each calendar year for the preceding calendar year. This report shall contain any required monitoring specified in Section 6 of the permit. Additionally, all instances of deviations from permit requirements shall be clearly identified in the report. 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.

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

- 6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official (RO) that affirms, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that details the following production information in tons on both a monthly basis and on a 12-month rolling total:

- (a) The throughput of presswood product manufactured; and
- (b) The throughput of wood chips dried in the rotary dryer in oven-dried tons (as determined by the throughput of presswood product manufactured).

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

6.5 For Emission Points AA-001 through AA-005, the permittee shall submit an annual monitoring report (AMR) in accordance with Condition 6.2 that summarizes any maintenance actions performed on an air pollution control device. The report shall also include the date and corresponding duration (in hours) in which a control device was non-operational.

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

6.6 For Emission Point AA-002, the permittee shall submit a compliance certification postmarked by March 15th of the calendar year immediately following the completion of a performance tune-up for a boiler. The report shall contain (at a minimum) the following information:

- (a) The company name and address;
- (b) A statement by the Responsible Official (which includes the official's name, title, phone number, e-mail address, and signature) that certifies the truth, accuracy, and completeness of this notification as well as a statement of whether the boiler has complied with all the applicable standards and requirements found in 40 CFR Part 63, Subpart JJJJJ.

Additionally, the notification shall also include the following certifications of compliance:

- (1) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up each boiler unit"; and
- (2) "This facility complies with the requirement in 40 CFR 63.11214(d) and 40 CFR 63.11223(g) to minimize the boiler's time spent during start-up and shutdown and to conduct start-ups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if the manufacturer's recommended procedures are not available."

- (3) Any deviation from applicable requirements during the reporting period [which shall also include a description of the deviation(s), the time period(s) during which the deviation(s) occurred, and the corrective action(s) taken].

(Ref.: 40 CFR 63.11225(b)(1) – (3); Subpart JJJJJ)