STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Biewer Sawmill Newton, LLC
331 Coliseum Drive
Newton, Newton County, MS

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.

Permit Issued: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires:[Date not to exceed 5 years from issuance] **Permit No.: 1980-00044**

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS 3

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES 14

SECTION 3. EMISSION LIMITATIONS & STANDARDS 15

SECTION 4. COMPLIANCE SCHEDULE 25

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 26

SECTION 6. ALTERNATIVE OPERATING SCENARIOS 38

SECTION 7. TITLE VI REQUIREMENTS 39

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

APPENDIX C KILN INSPECTION AND MAINTENANCE PLAN

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(b).)

1.3 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 three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or the 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) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the MDEQ at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

1.5 The permittee shall furnish to the 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 permittee or, for information 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. 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 MDEQ 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – *Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act*.

(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 1st of each year. By July 1st 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 MDEQ by the first payment date of September 1st. 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 MDEQ 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 MDEQ, 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, 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 Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP 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 MDEQ 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 timeframe as provided in other regulations for emergencies] and the notification includes the following:

(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 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, 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – *Permit Regulations for the Construction and/or Operation of Air Emissions Equipment*, and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 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 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).)

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, silvi-cultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, 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 non-compliance 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 Part (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 MDEQ within two (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, start-ups, and shutdowns.

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

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

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

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

(b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this 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, Chapter 1, Rule 1.10.B.(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see

the upset requirements above.

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

1.26 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 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.)

1.27 Regarding compliance testing (if 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).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

EMISSION POINT	DESCRIPTION
AA-100	Facility-Wide (Biewer Sawmill Newton, LLC)
AA-001	Continuous Direct-Fired Lumber Drying Kiln [equipped with a 38.76 MMBTU / hour natural gas-fired, low-NO_X gasifier burner]
AA-002	Continuous Direct-Fired Lumber Drying Kiln [equipped with a 38.76 MMBTU / hour natural gas-fired, low-NO_X gasifier burner]
AA-003	Continuous Direct-Fired Lumber Drying Kiln [equipped with a 38.76 MMBTU / hour natural gas-fired, low-NO_X gasifier burner]
AA-004	Two (2) Log Process Debarkers
AA-005	Bark Hog
AA-007	Sawmill Area [includes two (2) separate saw lines]
AA-008	Two (2) Sawmill Screens and One (1) Chipper
AA-009	Planer Mill Area [includes the Planer Mill Block Hog – emissions are routed to a cyclofilter (a combination cyclone / baghouse control unit)]
AA-010	Haul Roads [*fugitive*]
AA-011	Residual Wood Storage Area [includes the Bark Pile, the Wood Chip Storage Bin, the Sawdust Storage Bin, and the Wood Shavings Storage Bin]
AA-012	Above-Ground Storage Tanks [includes one (1) 1,000-gallon gasoline tank; one (1) 10,000-gallon diesel tank; one (1) 1,000-gallon used oil tank, one (1) 2,000-Gallon hydraulic oil tank]
AA-014	60 HP (0.84 MMBTU / hour) Natural Gas-Fired Emergency Generator Engine [4-stroke / lean burn; manufactured in November 2015]
AA-015	Continuous Direct-Fired Lumber Drying Kiln [equipped with a 38.76 MMBTU / hour natural gas-fired, low-NO_X gasifier burner]

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 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 Parts (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.A.2 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.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.)

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Limit / Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM (filterable only)	$E = 4.1(p^{0.67})$
AA-001 AA-002 AA-003 AA-015	40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.B.2	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.2	PM (filterable only)	$E = 0.8808\ (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 **(PSD BACT Limits)**	3.B.3	VOCs (as WPP1)	4.74 Pounds / MBF (for Each Kiln) 830.02 tpy (for Combined Kilns; 12-Month Rolling Total)
		3.B.4	Dried Lumber Throughput	350.0 MMBF / Year (for Combined Kilns; 12-Month Rolling Total)
		3.B.5	Final Moisture Content	10% or Greater
		3.B.6	Maximum Operating Temperature	275 ºF
AA-004	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 **(PSD Avoidance Standard)**	3.B.7	PM (filterable only) PM_{10} / $PM_{2.5}$ (filterable + condensable)	Operational Requirement (Total Enclosure)
AA-007	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 **(PSD Avoidance Standard)**	3.B.8		Operational Requirement (Full Enclosure)

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Limit / Standard
AA-009	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.9	PM_{10} / $PM_{2.5}$	Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018	3.B.10	PM (filterable only)	Operational Requirement
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 **(PSD Avoidance Limit)**	3.B.11	PM_{10} / $PM_{2.5}$ (filterable + condensable)	20.93 Tons / Hour 70,000 tpy (12-Month Rolling Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018	3.B.12	Differential Pressure Range	$0.2 \leq \Delta P \leq 6.0$ (inches H_2O)
AA-012	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 **(PSD BACT Limit)**	3.B.13	Surface Coating Requirement	Apply Coating Described as "*Light*" or "*White*"
AA-014	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iv); Subpart JJJJ 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(3); Subpart ZZZZ	3.B.14	NO_X + HC CO	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.3.D.1(a).	3.B.15	PM (filterable only)	0.6 Pounds Per MMBTU / Hour Heat Input

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Limit / Standard
AA-014	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 40 CFR 60.4237(c); Subpart JJJJ	3.B.16	Hours of Operation	Install a Non-Resettable Hour Meter
	40 CFR 60.4233(d) and 60.4234; Subpart JJJJ – Table 1	3.B.17	NO_X + HC	10 Grams / Horsepower-Hour
			CO	387 Grams / Horsepower-Hour
	40 CFR 60.4243(e); Subpart JJJJ	3.B.18	Propane Gas Usage	100 Hours / Calendar Year
	40 CFR 60.4243(d)(1–3); Subpart JJJJ	3.B.19	Non-Emergency Operation	100 Hours / Calendar Year

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

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

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.B.2 Emission Points AA-001 through AA-003 and AA-015 are subject to and shall comply with applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

For the purpose of this permit, Emission Points AA-001 through AA-003 and AA-015 are only subject to an initial notification requirement.

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

3.B.2 For Emission Points AA-001 through AA-003 and AA-015, the maximum permissible

emission of ash and/or particulate matter (PM) from each gasifier burner shall not exceed an emission rate as determined by the following relationship:

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

Where "*E*" is the emission rate in pounds per 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.F.(1)(b).)

3.B.3 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall limit the emission of volatile organic compounds [as determined by "*Wood Products Protocol 1 VOC*" (WPP1 VOC)] from each kiln to no more than 4.74 pounds per thousand board feet (MBF).

Additionally, VOC emissions from the combined kilns shall not exceed 830.02 tons per year (tpy) based on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD BACT Limit)

3.B.4 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall limit the total throughput of dried lumber produced from the combined kilns to no more than 350.0 million board feet (MMBF) [or 350,000.0 thousand board feet (MBF)] per year based on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD BACT Limit)

3.B.5 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall limit the final moisture content of dried lumber produced within each kiln to 10% or greater.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD BACT Limit)

3.B.6 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall limit the maximum operating temperature of each kiln to no more than 275ºF.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD BACT Limit)

3.B.7 For Emission Point AA-004, the permittee shall ensure the structural integrity of the building that contains the referenced emissions source equipment is sustained as a "*total enclosure*" for the complete reduction of particulate matter-based emissions (i.e. PM; PM_{10}; $PM_{2.5}$).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD Avoidance Limit)

3.B.8 For Emission Point AA-007, the permittee shall ensure that the structural integrity of the building and the enclosures that contain the referenced emission source equipment is sustained as "*full enclosures*" for the purpose of achieving the maximum reduction of particulate matter-based emissions (i.e. PM; PM_{10}; $PM_{2.5}$).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD Avoidance Limit)

3.B.9 For Emission Point AA-009, the permittee is subject to and shall comply with all applicable requirements 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

3.B.10 For Emission Point AA-009, the permittee shall not operate the planer mill area without simultaneously operating the cyclofilter. If the cyclofilter malfunctions or stops operating, the permittee shall cease operations at the planer mill area until the cyclofilter is returned to service.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018)

3.B.11 For Emission Point AA-009, the permittee shall limit the dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area to no more than 20.93 tons per hour. Additionally, the dried lumber shavings / trim from the planer mill area shall not exceed 70,000 tons per year (tpy) in a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD Avoidance Limit)

3.B.12 For Emission Point AA-009, the permittee shall operate the cyclofilter in such a manner as to maintain a differential pressure drop (ΔP) that is greater than / equal to 0.2 inches of water (in. H_2O) and less than / equal to 6.0 in. H_2O [i.e. $0.2 \leq \Delta P \leq 6.0$] during active

planer mill operations.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018)

3.B.13 For Emission Point AA-012, the permittee shall only apply a surface coating to the referenced storage tanks with a coloring either described as "*light*" or "*white*".

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018 – PSD BACT Limit)

3.B.14 Emission Point AA-014 is subject to and shall comply with applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

By complying with the applicable requirements of Subpart JJJJ, the permittee is demonstrating compliance with applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

(Ref.: 40 CFR 60.4230(a)(4)(iv), Subpart JJJJ)
(Ref.: 40 CFR 63.6590(c)(3), Subpart ZZZZ)

3.B.15 For Emission Point AA-014, the maximum permissible emission of ash and/or particulate matter (PM – filterable only) shall not exceed 0.6 pounds per million BTU (MMBTU) per hour heat input.

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

3.B.16 For Emission Point AA-014, the permittee shall install a non-resettable hour meter on the engine regardless of whether the permittee is required to do so by a Federal regulation.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 28, 2016 and modified on November 7, 2018)
(Ref.: 40 CFR 60.4237(c), Subpart JJJJ)

3.B.17 For Emission Point AA-014, the permittee shall not discharge into the atmosphere any gases that contain the following pollutants in excess of the corresponding emission standards:

(a) Nitrogen Oxides + Hydrocarbons (NO_X + HC): 10 grams per horsepower-hour;

and

(b) Carbon Monoxide (CO): 387 grams per horsepower-hour.

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 60.4233(d) and 40 CFR 60.4234, Subpart JJJJ – Table 1)

3.B.18 For Emission Point AA-014, the permittee may operate the engine using propane as an alternative fuel for a maximum of one hundred (100) hours per calendar year only during emergency operations.

(Ref.: 40 CFR 60.4243(e), Subpart JJJJ)

3.B.19 For Emission Point AA-014, 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 Parts (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced 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. 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 60.4243(d)(1–3), Subpart JJJJ)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement(s)	Condition Number	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 emission sources of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning emission source 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 or SO_2) per million BTU heat input.

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Work Practice Standard
AA-001 AA-002 AA-003 AA-015	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	3.D.1	VOCs	Conduct Inspections and/or Maintenance Actions in Accordance with Maintenance / Inspection Plan

3.D.1 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall conduct and record inspections and/or maintenance actions on each kiln in accordance with the work practice standards in the Maintenance and Inspection Plan as outlined in Appendix C of this permit.

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

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

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 31st for the preceding calendar year. 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; and

(e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C.(5)(a), (c), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

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

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring 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 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

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

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) 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 MDEQ 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).)

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-001 AA-002 AA-003 AA-015	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	Dried Lumber Throughput	Monitor and Record Total Throughput from the Combined Kilns (Monthly and 12-Month Rolling Total)
		5.B.2	Final Moisture Content	Monitor Moisture Content of Dried Lumber Processed Through the Planer Mill Area Record and Maintain Monthly Moisture Content Trending Data
		5.B.3	Maximum Operating Temperature	Record and Maintain Monthly Operating Temperature Trending Data
AA-004 AA-007	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.4	PM PM_{10} / $PM_{2.5}$	Perform and Record Monthly Visible Emission Observations
AA-009	40 CFR 64.7(b) and (c), CAM	5.B.5	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d), CAM	5.B.6	Corrective Action	Perform Corrective Action Response to an Excursion / Exceedance of CAM Indicator
	40 CFR 64.8, CAM	5.B.7	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b), CAM	5.B.8	CAM Records	Record and Maintain CAM Records (As Specified)
	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.9	Differential Pressure Drop Opacity	CAM Requirements: Daily Monitoring of Differential Pressure Drop and Monthly Monitoring of Visible Emissions
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.10	PM PM_{10} / $PM_{2.5}$	Monitor and Record Total Throughput of Dried Lumber Shavings / Trim to Cyclofilter Monthly Calculate and Record Average Hourly Throughput of Dried Lumber Shavings / Trim to Cyclofilter
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.B.11		Perform and Record a Monthly Inspection of the Cyclofilter

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-012	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.B.12	VOCs	Maintain Documentation that Indicates Surface Coating Color
AA-014	40 CFR 60.4243(e); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.13	NO_X + HC CO	Record Hours of Operation (Emergency and Non-Emergency)
	40 CFR 60.4243(b)(1); Subpart JJJJ	5.B.14		Conduct Compliance Demonstration Measures (As Applicable)
AA-014	40 CFR 60.4243(e); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.15	Hour of Operation	Monitor and Record Propane Usage

5.B.1 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall monitor and record the total throughput of dried lumber produced by the combined kilns in thousand board feet (MBF) on 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 AA-001 through AA-003 and AA-015, the permittee shall demonstrate compliance with the final moisture content limit specified in Condition 3.B.5 by monitoring the moisture content of all dried lumber processed through the planer mill area. Additionally, the permittee shall record and maintain trend data that displays the moisture content of dried lumber based on a monthly average.

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

5.B.3 For Emission Points AA-001 through AA-003 and AA-015, the permittee shall demonstrate compliance with the maximum operating temperature limitation specified in Condition 3.B.6 by recording and maintaining temperature trend data for each kiln on a monthly basis.

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

5.B.4 For Emission Point AA-004 and AA-007, the permittee shall perform and record a monthly visible emission observation in accordance with EPA Test Method 22 on the ambient air outside each building during daylight hours and during representative operating conditions.

If visible emissions are detected during an observation, the permittee shall determine the cause of the visible emissions and take the necessary corrective action(s) to prevent

further emissions.

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 emissions, and the date / time when visual emission observations were conducted.

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

5.B.5 For Emission Point AA-009, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

(a) *Proper maintenance*: At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(b) *Continued operation*: Except for (as applicable) monitoring malfunctions, associated repairs, and required quality assurance or control activities [including, (as applicable) calibration checks and required zero and span adjustments], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, [including in data averaging and calculations or in fulfilling a minimum data availability requirement (as applicable)].

The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), Compliance Assurance Monitoring)

5.B.6 For Emission Point AA-009, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control

system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard (as applicable).

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), Compliance Assurance Monitoring)

5.B.7 For Emission Point AA-009, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) that contains the elements specified in 40 CFR 64.8(b).

The QIP shall be developed and implemented within one hundred eighty (180) days of written notification from the MDEQ that a QIP is required. The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, Compliance Assurance Monitoring)

5.B.8 For Emission Point AA-009, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.7 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions (as applicable).

As applicable, the records of monitoring data and monitoring performance data should include the date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), Compliance Assurance Monitoring)

5.B.9 For Emission Point AA-009, the permittee shall monitor both the differential pressure drop of the cyclofilter (in inches of water) daily and visible emissions from the cyclofilter (in accordance with EPA Test Method 9) monthly in accordance with the

CAM Plan found in Appendix B of this permit.

(Ref.: 40 CFR 64.3(a) and (b), 64.6(c), Compliance Assurance Monitoring)

5.B.10 For Emission Point AA-009, the permittee shall monitor and record the throughput (in tons) of dried lumber shavings / trim conveyed to the cyclofilter from the planer mill area on both a monthly and 12-month rolling total basis.

Additionally, the permittee shall demonstrate compliance with the hourly throughput limit specified in Condition 3.B.10 by calculating and recording the average hourly throughput for each calendar month. This calculation shall be based on both the monthly total throughput of dried shavings / trim conveyed to the cyclofilter and the corresponding monthly hours of operation for the planer mill area.

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

5.B.11 For Emission Point AA-009, the permittee shall perform and record a monthly inspection of the cyclofilter to note any required maintenance.

If a problem is noted with the cyclofilter during an inspection, the permittee shall perform the maintenance necessary to ensure operation as originally designed. Additionally, the permittee shall maintain on-site sufficient components as is necessary to repair and/or replace bags within the cyclofilter.

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

5.B.12 For Emission Point AA-012, the permittee shall maintain documentation that indicates the surface coating on a storage tank complies with the requirement specified in Condition 3.B.13.

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

5.B.13 For Emission Point AA-014, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation monthly for the engine for both emergency and non-emergency service on a monthly basis. Additionally, the permittee shall detail what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4245(b), Subpart JJJJ)
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.14 For Emission Point AA-014, the permittee shall demonstrate compliance with the following provisions given that the engine is EPA-certified:

(a) Confirm the purchase of a spark-ignition internal combustion engine certified to the referenced emission standards and maintain such documentation.

(b) If the permittee operates and maintains the engine according to the manufacturer's emission-related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee must also meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as they apply). If the permittee adjusts engine settings according to and consistent with the manufacturer's instructions, the engine will not be considered out-of-compliance.

(c) If the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine. As such, the permittee must keep a maintenance plan, retain records of conducted maintenance to demonstrate compliance, and maintain / operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to a practicable extent). However, the permittee is not required to conduct performance testing on the engine.

(Ref.: 40 CFR 60.4243(b)(1), Subpart JJJJ)

5.B.15 For Emission Point AA-014, the permittee shall monitor and record the duration (in hours) spent operating the engine with propane as a fuel source on a monthly basis. Additionally, the permittee shall document what circumstance(s) prompted the use of propane as a fuel source (in lieu of natural gas).

(Ref: 40 CFR 60.4243(e), Subpart JJJJ and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant(s) / Parameter(s) Monitored	Reporting Requirement(s)
AA-100	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.1	VOCs HAPs Throughputs	Submit a Semi-Annual Monitoring Report (SMR) on Operational Data
AA-009	40 CFR 64.9(a), CAM	5.C.2	CAM Reporting	Submit Semi-Annual Reports
	40 CFR 64.7(e), CAM	5.C.3	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit / Standard (Though No Excursion or Exceedance was Indicated by Approved Monitoring)
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.4	Hours of Operation	Submit an Annual Summary on Operational Data

5.C.1 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that summarizes the following information:

(a) The total dried lumber throughput produced from the combined drying kilns in thousand board feet (MBF) on a 12-month rolling total;

(b) Any revision(s) made to the Maintenance and Inspection Plan;

(c) Any maintenance actions performed on an enclosure in order to maintain the emissions reduction specified in Condition 3.B.7 or 3.B.8 (as applicable);

(d) Any maintenance actions performed on the cyclofilter and any periods of time in which the cyclofilter was non-operational during active planer mill operations; and

(e) The total dried lumber shavings / trim throughput conveyed to the cyclofilter from the planer mill area on a rolling 12-month total.

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

5.C.2 For Emission Point AA-009, the permittee shall submit a semi-annual report in accordance with Condition 5.A.4 with the following information (as applicable):

(a) Summary information on the number, duration, and cause [including unknown cause (if applicable)] of excursions or exceedances (as applicable) and the corrective actions taken;

(b) Summary information on the number, duration, and cause [including unknown cause (if applicable)] for monitor downtime incidents [other than downtime associated with zero and span or other daily calibration checks (if applicable)]; and

(c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.7. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a), Compliance Assurance Monitoring)

5.C.3 For Emission Point AA-009, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e), Compliance Assurance Monitoring)

5.C.4 For Emission Point AA-014, the permittee shall submit a summary within the semi-annual monitoring report (SMR) to be postmarked by January 31st that details the hours of operation for the engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

(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 the MDEQ 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 the 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;

(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

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
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
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
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
lbs. / 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
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

Compliance Assurance Monitoring (CAM) Plan

	Indicator No. 1	**Indicator No. 2**
Indicator	Different Pressure Approach: Pressure gauge as indicator of particulate control	Visible Emissions
Measurement Approach		Visible Emissions Evaluation (VEE)
Monitoring Method and Location	Differential pressure drop on cyclofilter	Complete VEE on the exhaust discharge using EPA Test Method 9 during daylight hours and normal operation
Indicator Range (including the corrective action taken for an excursion)	0.2 – 6.0 (inches H_2O) If any reading outside reading, shutdown and perform corrective action	No visible emissions. If any visible emissions are detected, determine opacity. If opacity is greater than 40%, shutdown and perform corrective action
Monitoring Frequency	Daily when Planer Mill in operation	Monthly
Data Collection/ Recordkeeping Procedures	Record data daily	Record completion of VEE, results, and any corrective action(s) taken to minimize emissions as a result of any VEE
Averaging Period	None	None
QA/QC Practices	Calibration and maintenance completed in accordance with manufacturer's recommendation	Semi-annual summary of VEE information ensures the facility adheres to the requirement. Weekly inspections of major components of the cyclofilter ensures operation and maintenance per design.

APPENDIX C

Kiln Maintenance and Inspection Plan

Continuous Dry Kiln #1

FANS

_____ Inspect **Conditioning Chamber Circulation Fan #1**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Circulation Fan #2**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Circulation Fan #3**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #4**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #5**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #6**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #7**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #8**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #9**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #10**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #11**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #12**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Drying Chamber Circulation Fan #13**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Circulation Fan #14**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Circulation Fan #15**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Circulation Fan #16**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Check the fan bolts for looseness. Insure proper bolt torque.

_____ Inspect **Conditioning Chamber Exhaust Fan #1**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness.

_____ Inspect **Conditioning Chamber Exhaust Fan #2**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness.

_____ Inspect **Combustion Air Fan**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness. Inspect expansion joint material for damage.

_____ Inspect **Heat Fan (Recirculation)**. Check drive belts for proper belt tension and belt wear. Check the sheaves for wear and loose bolts. Check shaft bearings for missing seals, wear and looseness.

STRUCTURAL

_____ Inspect upper floor decking for loose and missing bolts.

_____ Inspect floor dampers. Insure they are open and bolts are tight.

_____ Inspect fan shrouds for damage and looseness.

_____ Inspect baffles for damage. Look for broken supports or hinges.

PUSHER

_____ Inspect Pusher #1 encoders for damaged or missing orings. Inspect pusher cylinder for leaks. Check cylinder connection.

_____ Inspect Pusher #2 encoders for damaged or missing orings. Inspect pusher cylinder for leaks. Check cylinder connection.

_____ Check Pusher #1 hydraulic reservoir for leaks.

_____ Check Pusher #2 hydraulic reservoir for leaks.

Continuous Dry Kiln #1

_____ Lubricate Conditioning Chamber Circulation Fan #1 (5 lubrication points)

_____ Lubricate Conditioning Chamber Circulation Fan #2 (5 lubrication points)

_____ Lubricate Conditioning Chamber Circulation Fan #3 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #4 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #5 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #6 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #7 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #8 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #9 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #10 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #11 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #12 (5 lubrication points)

_____ Lubricate Drying Chamber Circulation Fan #13 (5 lubrication points)

_____ Lubricate Conditioning Chamber Circulation Fan #14 (5 lubrication points)

_____ Lubricate Conditioning Chamber Circulation Fan #15 (5 lubrication points)

_____ Lubricate Conditioning Chamber Circulation Fan #16 (5 lubrication points)

_____ Lubricate Conditioning Chamber Exhaust Fan #1 (2 lubrication points)

_____ Lubricate Conditioning Chamber Exhaust Fan #2 (2 lubrication points)

_____ Lubricate Combustion Air Fan #1 (2 lubrication points)

Continuous Dry Kiln #1

_____ Lubricate Pusher #1 (2 lubrication points)

_____ Lubricate Pusher #2 (2 lubrication points)

_____ Check the hydraulic oil level in Pusher #1 hydraulic unit

_____ Check the hydraulic oil level in Pusher #2 hydraulic unit