# STATE OF MISSISSIPPI
# AIR POLLUTION CONTROL PERMIT

# AND PREVENTION OF SIGNIFICANT DETERIORATION (PSD) AUTHORITY

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

**THIS CERTIFIES THAT**

Weyerhaeuser NR Company, Bruce Facility
106 Railroad Street
Bruce, Calhoun County, Mississippi

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

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

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**AUTHORIZED SIGNATURE**
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** **Permit No.: 0300-00032**

## SECTION 1. GENERAL CONDITIONS

1.1 This permit is for air pollution control purposes only.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.9 The permittee shall furnish to the Mississippi Department of Environmental Quality (DEQ) 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

DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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).)

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

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

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

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

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

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

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

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

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

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

(a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

(b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

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

(a) Persistent violation of any of the terms or conditions of this permit;

(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

(c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

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

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

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

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

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

The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)

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

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

1.21 *Beginning Operation*: After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate (whichever is applicable) is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.13.G.

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

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

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

1.23 *Operating Under a Permit to Construct*: Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit (whichever is applicable), the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

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

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, 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;

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

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

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

(iv) That as soon as practicable but no later than 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) – (e).

(3) Where an upset (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.) occurs during a start-up or shutdown, see the upset requirements above.

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

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

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

1.26 *Compliance Testing*: Regarding compliance testing:

(a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations of this permit and in units of mass per time.

(b) Compliance testing will be performed at the expense of the permittee.

(c) Each emission sampling and analysis report shall include but not be limited to the following:

(1) Detailed description of testing procedures;

(2) Sample calculation(s);

(3) Results; and

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

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

## SECTION 2. EMISSION POINT DESCRIPTION

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

| Emission Point | Description |
|---|---|
| AA-100 | Facility-Wide (Weyerhaeuser NR Company, Bruce Facility) |
| AA-004 | Truck Chip Storage Bin Cyclone (Ref. No. 105) |
| AA-005 | No. 1 Planer Cyclone (Ref. No. 109) |
| AA-006 | No. 1 Planer Shavings Truck Storage Bin Cyclone (Ref. No. 110) |
| AA-008 | Log Deck Cut-Off Saws [fugitive] (Ref. No. F003) |
| AA-009 | Ring Debarker [fugitive] (Ref. No. F004) |
| AA-010 | Planer Shavings Truck Loading Storage Bin [fugitive] (Ref. No. F005) |
| AA-011 | Hog Fuel Storage Bin [fugitive] (Ref. No. F006) |
| AA-012 | Bark Hog [fugitive] (Ref. No. F007) |
| AA-014 | Hog Fuel Storage Pile [fugitive] (Ref. No. F009) |
| AA-015 | Haul Roads [fugitive] (Ref. No. F010) |
| AA-016 | Bark / Green Sawdust Storage Bin for Truck Loading Operations [fugitive] (Ref. No. F011) |
| AA-017 | 215 HP (160 kW) Compression Ignition (CI) Emergency Fire Water Pump Engine [manufactured before June 12, 2006] |
| AA-018 | Direct-Fired Continuous Drying Kiln [equipped with a 35 MMBTU / hour wood-fired grate gasifier burner and an abort stack (for start-up, shutdown, and idling periods)] (Ref. No. CDK-5) |
| AA-019 | Direct-Fired Continuous Drying Kiln [equipped with a 35 MMBTU / hour wood-fired grate gasifier burner and an abort stack (for start-up, shutdown, and idling periods)] (Ref. No. CDK-6) |
| AA-020 | Fuel Bin Cyclone for Emission Point AA-018 (Ref. No. CDKC-5) |
| AA-021 | Fuel Bin Cyclone for Emission Point AA-019 (Ref. No. CDKC-6) |
| AA-022 | Fuel Bin Cyclone for Emission Point AA-023 (Ref. No. CDKC-4) |
| AA-023 | Direct-Fired Continuous Drying Kiln [equipped with 35 MMBTU / hour wood-fired grate gasifier burner, an abort stack (for and start-up / shutdown periods), and a bypass stack (for idling periods)] (Ref. No. CDK-4) |

## SECTION 3. EMISSION LIMITATIONS AND STANDARDS

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant / Parameter | Limitation / Standard |
|---|---|---|---|---|
| AA-100 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). | 3.1 | PM (filterable) | $E = 4.1(p^{0.67})$ |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.A. | 3.2 | Opacity (Smoke) | ≤ 40% |
| | 11 Miss. Admin. Code Pt. 2, R. 1.3.B. | 3.3 | Opacity | |
| AA-018 AA-019 AA-023 | 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued April 1, 2016 and modified [DATE] | 3.4 | Fuel Source Restriction | Combust Uncontaminated Wood Waste and Char (Diesel May be Used During a Start-Up Period) |
| | 40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products<br>40 CFR 63.2231(a) and (b), 63.2233(a); Subpart DDDD | 3.5 | HAPs | General Applicability |
| | 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j)<br>**(PSD BACT Limits)** | 3.6 | VOCs (as WPP1) | 4.52 Pounds / MBF; and<br>734.5 tpy (12-Month Rolling Total) |
| | | 3.7 | Dried Lumber Throughput | 325,000.0 MBF / Year (Combined Kilns; 12-Month Rolling Total) |
| | | 3.8 | Final Moisture Content | 12.0% or Greater (Monthly Average) |

3.1 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).)

3.2 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 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 one (1) hour.

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

3.3 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 3.2. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.4 For Emission Points AA-018, AA-019 and AA-023, the permittee shall only combust uncontaminated wood waste and char within the kiln burners. For the purpose of this permit, “uncontaminated wood waste” is defined as any by-product generated from processing harvested timber/ dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue and, “char” is defined as the product of combusting “uncontaminated wood waste” in the kiln burners.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition. The permittee is authorized to use up to ten (10) gallons of diesel to ignite the fuel bed during a start-up period.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued April 1, 2016 and modified [DATE])

3.5 For Emission Points AA-018, AA-019, and AA-023, the permittee is subject to and comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions.

For the purpose of this permit, Emission Points AA-018, AA-019, and AA-023 are only subject to an initial notification requirement. For Emission Points AA-018 and AA-019, this requirement was satisfied with the receipt of the PSD Permit to Construct application on January 16, 2014. For Emission Point AA-023, this requirement was satisfied with the receipt of the PSD Permit to Construct application on May 4, 2021.

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

3.6 For Emission Points AA-018, AA-019 and AA-023, the permittee shall limit the emission of volatile organic compounds as determined by Wood Products Protocol 1 (VOCs as WPP1) to no more than 4.52 pounds per thousand board feet (MBF) and no more than 734.5 tons per year (tpy) based on a 12-month rolling total basis.

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

3.7 For Emission Points AA-018, AA-019, and AA-023, the permittee shall limit the total throughput of lumber dried in the combined kilns to no more than 325,000.0 thousand board feet (MBF) per year based on a 12-month rolling total basis.

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

3.8 For Emission Points AA-018, AA-019, and AA-023, the permittee shall limit the final moisture content of dried lumber produced within each kiln to 12.0% or greater based on a monthly average.

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

## SECTION 4. WORK PRACTICE STANDARDS

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant / Parameter | Work Practice |
|---|---|---|---|---|
| AA-018<br>AA-019<br>AA-023 | 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j)<br>**(PSD BACT Standard)** | 4.1 | VOCs | Develop, Implement, and Maintain a Good Work Practices Plan |

4.1 For Emission Points AA-018, AA-019, and AA-023, the permittee shall develop, implement, and maintain a "Good Work Practices Plan" that establishes work practice standards in accordance with the manufacturer's recommendations for continuous direct-fired kiln operations. The plan shall establish a routine for conducting preventative maintenance on the kiln that includes (at a minimum) the following actions:

(a) Conducting walk-around inspections;

(b) Confirming proper wet-bulb operation;

(c) Conducting entrance / exit baffle and damper inspections;

(d) Checking wet-bulb wicks for integrity;

(e) Greasing the kiln cart wheels and fan shaft bearings;

(f) Conducting circulation, exhaust, and combustion air fan inspections;

(g) Checking hydraulic oil levels;

(h) Calibrating moisture content equipment (as applicable);

(i) Calibrating temperature probe equipment;

(j) Conducting burner clean-outs and tune-ups;

(k) Checking for leaks in kiln pipe-work;

(l) Checking shaft seals at wall penetrations (as applicable);

(m) Conducting rotary air locks and fuel blowers inspections;

(n) Conducting recirculation, ignition, combustion, over-fire and bridge wall blowers inspections; and

(o) Conducting wood feed screws and kiln burners inspections.

The permittee shall perform all inspections and maintenance actions on the schedule specified in the plan. If any problem is noted during an inspection, the permittee shall perform the necessary unscheduled maintenance to ensure the operation of the kiln as originally designed.

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

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point(s) | Applicable Requirement | Condition Number | Pollutant / Parameter | Monitoring / Recordkeeping Requirement |
|---|---|---|---|---|
| AA-100 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.9. | 5.1 | Recordkeeping | Maintain Records for a Minimum of Five (5) Years |
| | 40 CFR 52.21(r)(6)(iii); Subpart A | 5.2 | PM (filterable)<br>$PM_{10}$ / $PM_{2.5}$ (filterable + condensable) | Calculate and Maintain Project-Related Emissions Increases |
| AA-004<br>AA-005<br>AA-006<br>AA-020<br>AA-021<br>AA-022 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.3 | Opacity | Perform Monthly Visible Emission Observations |
| | | 5.4 | PM / $PM_{10}$ / $PM_{2.5}$ (filterable only) | Perform Monthly Inspections on the Cyclones |
| AA-018<br>AA-019<br>AA-023 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.5 | Dried Lumber Throughput<br>VOCs | Monitor the Total Throughput and Total Emissions from the Combined Kilns (Monthly and 12-Month Rolling Total) |
| | | 5.6 | VOCs | Maintain Records on the Inspections / Maintenance Actions Performed for the Good Work Practices Plan |
| | | 5.7 | Final Moisture Content | Continuously Monitor the Moisture Content of Dried Lumber Processed through the Planer Mill<br>Determine the Average Moisture Content (Monthly Average) |
| | | 5.8 | PM / $PM_{10}$ / $PM_{2.5}$ | Monitor Date, Time, and Duration of Each Start-Up / Shutdown / Idling Period<br>Calculate Total Duration of All Applicable Periods (Rolling 12-Month Period) |

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to 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 Point AA-100 (Facility-Wide), the permittee shall monitor the respective emission increase of filterable particulate matter (PM), particulate matter less than 10 microns (μm) in diameter ($PM_{10}$; filterable + condensable), and particulate matter less than 2.5 μm in diameter ($PM_{2.5}$; filterable + condensable) as a result of the construction project proposed in the permit application received on May 4, 2021.

The permittee shall calculate and record the respective pollutant emissions in tons per year (tpy) on a 12-month calendar year basis from all sources affected by the proposed construction project for a duration of five (5) years following the resumption of regular operations after the permitted modifications in accordance with 40 CFR 52.21(r)(6)(i)(c); Subpart A.

(Ref.: 40 CFR 52.21(r)(6)(iii); Subpart A)

5.3 For Emission Points AA-004 through AA-006 and AA-020 through AA-022, the permittee shall demonstrate compliance with the opacity limitations outlined in Conditions 3.2 and 3.3 by performing a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each stack during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emission evaluation (VEE) in accordance with EPA Test Method 9 for (at a minimum) a duration of 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 all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of an evaluation, and the date / time when each observation / evaluation was conducted.

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

5.4 For Emission Points AA-004 through AA-006 and AA-020 through AA-022, the permittee shall perform a monthly inspection on each cyclone. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a cyclone.

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

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

5.5 For Emission Points AA-018, AA-019, and AA-023, the permittee shall monitor the total throughput of dried lumber from the combined kilns in thousand board feet (MBF) based on both a monthly and a 12-month rolling total basis.

Additionally, the permittee shall utilize the throughput data and the emission factor specified in Condition 3.6 to calculate and record the total emission of volatile organic compounds (VOCs) from the combined kilns both a monthly and a 12-month rolling total basis.

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

5.6 For Emission Points AA-018, AA-019 and AA-023, the permittee shall maintain records that detail the results of each inspection and maintenance action (preventative or unscheduled) performed on a kiln in accordance with the "Good Work Practices Plan" required by Condition 4.1.

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

5.7 For Emission Points AA-018, AA-019, and AA-023, the permittee shall demonstrate compliance with moisture content limitation specified in Condition 3.8 by continuously monitoring and maintaining the moisture of dried lumber processed in the planer mill and determining an average final moisture content on a monthly basis.

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

5.8 For Emission Points AA-018, AA-019, and AA-023, the permittee shall monitor and record the date, time, and duration of each start-up, shutdown, and idling period experienced by each gasifier burner in which emissions are diverted to a corresponding abort stack and/or bypass stack.

Additionally, the permittee shall calculate and record the total duration of all applicable periods for all kilns in hours per year based on a rolling 12-month period.

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

## SECTION 6. REPORTING REQUIREMENTS

| Emission Point(s) | Applicable Requirement | Condition Number | Reporting Requirement |
|---|---|---|---|
| AA-100 (Facility-Wide) | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(a) | Report Deviations Within Five (5) Working Days |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(b) | Submit Semi-Annual Reports |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.1(c) | Certification by Responsible Official |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2). | 6.1(d) | Notification of Beginning Actual Construction Within Fifteen (15) Days |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3). | 6.1(e) | Notification When Construction Does Not Begin or Is Suspended |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3). | 6.1(f) | Certification of Completion of Construction Prior to Operation |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2). | 6.1(g) | Notification of Changes in Construction |
| | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3). | 6.2 | Submit a Notification on the Completion of Construction |
| | 40 CFR 52.21(r)(6)(v); Subpart A | 6.3 | Submit Calculated Annual Emissions |
| | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.4 | Submit Semi-Annual Monitoring Reports |
| AA-018 AA-019 AA-023 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 6.5 | Submit the Updated Good Work Practices Plan |

### 6.1 General Reporting Requirements:

(a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

(b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C.

Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or start-up (whichever is applicable).

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

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

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

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

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

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

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

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

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

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

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

6.2 For Emission Point AA-100 (Facility-Wide), upon the completion of construction / installation of all permitted emission sources and prior to commencing operation, the permittee shall notify the MDEQ in writing that construction / installation has been completed in accordance with the approved plans and specifications on file no later than fifteen (15) days after completing the actual construction / installation.

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

6.3 For Emission Point AA-100 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 when applicable) of each year for the preceding 12-month calendar year that contains the following information:

(a) The name, address, and telephone number of the facility;

(b) The calculated annual emissions as specified in Condition 5.2; and

(c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections).

Additionally, the report shall contain the following information if the calculated annual emissions specified in Condition 5.2 meet the following criteria:

(d) Exceed the baseline actual emissions documented in the pre-construction Prevention of Significant Deterioration (PSD) major modification applicability test by a "*significant*" [as defined by 40 CFR 52.21(b)(23); Subpart A] amount for the pollutants referenced in Condition 5.2; and

(e) Differ from the established pre-construction projected emissions presented in the permit application received on May 4, 2021.

(Ref.: 40 CFR 52.21(r)(6)(v); Subpart A)

6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that details the following information:

(a) The total throughput (in thousand board feet) of lumber dried by the combined kilns both on a monthly and 12-month rolling total basis;

(b) The total emission of volatile organic compounds (VOCs) from the combined kilns both on a monthly and a 12-month rolling total basis;

(c) Any changes that have been made to the "Good Work Practices Plan*"* required by Condition 4.1;

(d) Any occurrence when a visible emissions evaluation (VEE) was necessary but not conducted and an explanation as to why it was not performed;

(e) Any maintenance action(s) performed on a cyclone and any periods of time (including date and duration) in which a cyclone was non-operational during active corresponding operations;

(f) The average moisture content of all dried lumber processed during each month;

(g) The total duration of all start-up, shutdown, and idling periods for the combined kilns in which emissions are diverted to the corresponding abort stack and/or bypass stack based on a rolling 12-month total.

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

6.5 For Emission Points AA-018, AA-019, and AA-023, the permittee shall submit the updated Good Work Practices Plan required by Condition 4.1 to the MDEQ no later than sixty (60) days after certifying construction of Emission Point AA-023 as complete.

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