

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

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Hood Industries, Inc.
66 Miles Lumber Company Road
Silver Creek, Lawrence 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

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: [DATE]

Permit No.: 1500-00020

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

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

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an 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 Nuisance Clause:* The permittee shall not cause 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 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

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nuisance to property other than that from which it originated or to violate any other provision of this permit, the MDEQ may order such corrected in a way that all air and gases or air and gas-borne 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 MDEQ Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

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

(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:

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

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

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 at least eighteen (18) months, or if construction is not completed within a reasonable time. The MDEQ 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 Operating 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, Part 2, Title 11, 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 Operating 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 Operating 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;
 - (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.)

- 1.25 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction 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 (Hood Industries, Inc.)
AA-003	30 MMBTU / Hour Direct-Fired Batch Lumber Drying Kiln [permitted to combust wood residue with LPG ignition]
AA-004	Planer Mill Operations [dried planer shavings are collected via a high-efficiency cyclone to be stored in the fuel silo]
AA-005	Fuel Silo Cyclone [recovers material from the wood hog to be stored in the fuel silo]
AA-007	Log Debarking Operations [<i>fugitive</i>]
AA-008	Sawmill Operations [<i>fugitive</i>]
AA-012	Unpaved Roads [<i>fugitive</i>]

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-003 AA-004 AA-005	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	≤ 40%
AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.2	Opacity (smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	Fuel Source Restriction	Combust Uncontaminated Wood Residue (and LPG as an Igniter Fuel)
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a), (b), 63.2233(a)(2), and 63.2252; Subpart DDDD	3.4	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limit)	3.5	VOCs (as WPP1)	4.636 Pounds / MBF 130.0 tpy (12-Month Rolling Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Limit)	3.6	Dried Lumber Throughput	56,064.0 MBF / Year (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	3.7	Operational Requirement	Implement the Operating and Maintenance Plan

- 3.1 For Emission Points AA-003, AA-004, and AA-005, except as otherwise specified 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.)

- 3.2 For Emission Point AA-003, except as otherwise specified 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 that exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions that 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.

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- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty (60) percent 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-003, the permittee shall only combust uncontaminated wood residue within the burner. For the purpose of this permit, “*uncontaminated wood residue*” is defined as any by-product generated from processing harvested timber/ dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue.

The permittee may purchase uncontaminated wood residue from third-party sources only if it meets the aforementioned definition. Additionally, the permittee is authorized to utilize liquefied petroleum gas (LPG) as an igniter fuel during periods of kiln start-up.

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

- 3.4 For Emission Point AA-003, the permittee shall be subject to all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 10 in Subpart DDDD).

For the purpose of this permit, Emission Point AA-003 is only subject to an initial notification requirement, which has been satisfied.

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

- 3.5 For emission Point AA-003, the permittee shall limit the emission of volatile organic compounds (VOCs) as Wood Products Protocol 1 (WPP1) to no more than 4.636 pounds per thousand board feet (MBF) and no more than 130.0 tons per year (tpy) based on a rolling 12-month total basis.

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

- 3.6 For emission Point AA-003, the permittee shall limit the total throughput of lumber dried within the kiln to no more than 56,064.0 thousand board feet (MBF) per year based on a rolling 12-month total basis.

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

- 3.7 For Emission Point AA-003, the permittee shall operate the kiln in accordance with the manufacturer’s recommendations and the “Operating and Maintenance Plan” (dated March 19, 2019) found in Appendix A of this permit.

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

SECTION 4. WORK PRACTICE STANDARDS

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION.

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
AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Dried Lumber Throughput	Monitor Throughput (Monthly and Rolling 12-Month Total)
		5.3	VOCs HAPs	Conduct Inspections / Maintenance Actions in Accordance with the Operating and Maintenance Plan
AA-004 AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Opacity	Perform a Visible Emission Observation Monthly
		5.5	PM (filterable)	Conduct an Inspection on Each Cyclone Weekly

- 5.1 For Emission Point AA-100 (Facility-Wide), 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 the “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-003, the permittee shall monitor the throughput of lumber dried within the kiln in thousand board feet (MBF) based on both a monthly basis and rolling 12-month rolling total basis.

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

- 5.3 For Emission Point AA-003, the permittee shall maintain documentation the details the results of each inspection and/or maintenance action performed on the kiln in accordance with the “Operating and Maintenance Plan” outlined in Appendix A of this permit.

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

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

- 5.4 For Emission Points AA-004 and AA-005, the permittee shall perform a monthly visible emissions observation in accordance with EPA Test Method 22 on the exhaust from each cyclone 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 perform and record a visible emission evaluation (VEE) in accordance with EPA Test Method 9. 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 VEE shall be performed by a person that is certified as a visible emission reader by the MDEQ or an equivalent agency qualified for such services.

The permittee shall maintain documentation that details the information specified by Method 22 and/or Method 9, the date and time of each observation / evaluation, the results each observation / evaluation, and any corrective actions taken to prevent or minimize emissions.

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

- 5.5 For Emission Points AA-004 and AA-005, the permittee shall perform an inspection that evaluates the performance capability of each cyclone on a weekly basis (or more often if necessary). If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a cyclone

The permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, any problem that is experienced during an inspection, any maintenance (either corrective or preventative) performed to return a cyclone to operation as originally designed, and the duration in which a cyclone is non-operational due to malfunction..

(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
		6.1(b)	Semi-Annual Reporting Requirements
		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. 2.2.B.(11).	6.2	Submit a Semi-Annual Monitoring Report

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

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(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 the MDEQ 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 no later than fifteen (15) days after the actual event.

(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), the permittee shall submit a semi-annual monitoring report in accordance with Condition 6.1(b) that details the following information:

- (a) For Emission Point AA-003 – the throughput (in thousand board feet) of lumber dried by the batch kiln on a 12-month rolling total basis;
- (b) For Emission Point AA-003 – any revision(s) made to the “Operating and Maintenance Plan” specified by Condition 3.8;

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- (c) For Emission Point AA-003 – any occurrence and duration of the kiln not operating in accordance with the “Operating and Maintenance Plan” and/or the manufacturer’s specifications;
- (d) For Emission Points AA-004 and AA-005 – any maintenance action(s) performed on a cyclone and any periods of time (including the date and duration) in which a cyclone malfunctioned.

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

APPENDIX A

Operating and Maintenance Plan for Direct-Fired Batch Lumber Drying Kilns
(dated March 19, 2019)

Hood Industries, Inc.
Silver Creek, Mississippi
Direct-Fired Batch Lumber Kiln Operating and Maintenance (O&M) Plan

Purpose

The purpose of this O&M Plan is to minimize emissions of air pollutants, maximize production, and prolong lifespan of the kiln and its components.

General Operating Conditions

Kiln Dry dimension lumber to a Target Moisture Content of 15%. Minimize number of pieces exceeding 19% MC (grade) for Quality Control and do not dry to moisture contents more than 7% below grade.

Kiln Dry timbers to a Target Moisture Content of 16%. Do not dry to moisture contents more than 7% below grade.

Kiln Dry Bulb temperatures not to exceed 250°F. Target wet bulb temperature 170°F. Operate within kiln control system settings at all times.

Service and clean kilns and burners as required.

Complete all preventative maintenance (PM) and corrective maintenance (CM) as required. Record all maintenance on forms generated by the maintenance program and file accordingly.

Maintenance

Daily

- File all kiln charge data.
- Monitor burner performance, and inspect building and equipment. Refer any deficiencies to maintenance program for correction.
- Periodically monitor fan currents, all temperature readings and kiln charts.
- Check fire protection engine, control settings and gauge readings.
- Retrieve moisture data from planer mill and adjust kiln schedules as needed.
- Inspect pulling cables for loading kilns and replace as needed.

Weekly

- Inspect kiln fans, bearings, and kiln structures for erosion and wear.
- Inspect roof vents for proper operation.
- Inspect and service blower and fans.
- Inspect and service recirculation motor.
- Inspect and service kiln burners.
- Inspect and service fuel feed system.
- Inspect kiln drainage piping. Clean as needed.
- Inspect water level and pump performance in condensate pit.

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Direct-Fired Batch Lumber Kiln Operating and Maintenance (O&M) Plan

Monthly

- Perform and record inspections on kiln safety shutdowns and gas train tests.
- Perform any required inspections on ladders and fall restraint devices.
- Wash inside kilns and inspect buildings and equipment for loose or worn parts.
- During cleaning inspect all refractory for wear.
- Service and inspect fuel feed system at silo.

Quarterly

- Clean and check position of all thermocouples and check condition of all conduit inside kilns.
- Inspect all kiln vents, linkages and actuators for leaks or loose parts.
- Inspect back up air compressor.
- Inspect all air and water lines for leaks and secureness.
- Inspect screw feed system in silo.

Annually

- Have fire pump tested.
- Have fire sprinkler system inspected.
- Have fire hoses charged and tested.

Recordkeeping

- Keep all daily kiln charge data and heat charts orderly and on file in control room for at least 1 year. Records then transferred to environmental file system and maintained on-site for 5 years.
- Prepare 12-month rolling total production reports and keep in environmental file system for period of 5 years.
- Keep records of maintenance performed in environmental file system for at least 5 years.
- Keep all fire protection system inspection records orderly and easily accessible upon request.
- All burner and kiln safety shutdown inspection records and gas train inspection records are to be turned in to maintenance department and filed electronically.

Hood Industries - Silver Creek

Standard Task Audit Report

Task # : W1421 WEEKLY KILN CHECKS**Enabled: True****Trade: 5500 - KILN OPERATOR Type: P/PM-1****When Performed: Running****Last Modified By: cstegall 2/6/2019****Total Hours :****Trade Hours: 0.00****WEEKLY CHECKS ON DRY KILN****STRUCTURE**

- () INSPECT KILN PANELS FOR DAMAGE AND LEAKAGE
- () INSPECT KILN DOORS AND LATCHES INCLUDING MAN DOORS AND GASKETS
- () INSPECT DOORS, FLOOR AND CEILING BAFFLES FOR DAMAGES
- () INSPECT SPRINKLER SYSTEMS FOR PROPER OPERATION
- () INSPECT DOWNCOMERS AND CLEAN WHEN NEEDED
- () CHECK DOWNCOMER AIR VELOCITY SEMI-ANNUALLY
- () INSPECT DUCT SYSTEM FOR LEAKS
- () INSPECT WET BULB, CHECK WATER SUPPLY AND CLEAN SOCK EACH CHARGE

VENTS

- () INSPECT ALL ROOF VENTS FOR DAMAGE
- () INSPECT PROPER OPENING AND CLOSURE OF VENTS
- () INSPECT VENT PULL RODS FOR PROPER ADJUSTMENTS

FAN STEM

- () GREASE BLOWER AND FANS, PURGE SEMI-ANNUALLY
- () CHECK PITCH
- () CHECK FOR PROPER BELT TENSIONING AND WEAR
- () CHECK FAN FOR FLY ASH BUILD-UP AND CLEAN AS NEEDED
- () CHECK FOR CRACKED HUBS AND EXCESS SIDE PLAY ON LONG SHAFTS
- () CHECK FAN SHROUD CLEARANCE AND DAMAGE

RECIRCULATION MOTOR

- () PERFORM VIBRATION AND TEMPERATURE CHECKS ON RECIR. BLOWER, INBOUND AND OUTBOARD BEARINGS (SHOULD BE UNDER 150 F AND NOT OVER .2 VIBRATION).
- () CHECK TEMPERATURE OF BEARING ON COMBUSTION AIRSIDE, (SHOULD BE BELOW 160 F)
- () CHECK TEMPERATURE OF RECIRC MOTOR (SHOULD BE UNDER 150 F)
- () INSPECT BELT AND SHEAVES FOR SLIPPAGE
- () INSPECT CLEARANCE OF FAN SHROUD INSIDE BLEND CHAMBER (SHOULD BE APPROXIMATELY FINGER THICKNESS ALL WAY AROUND
- () PERFORM VIBRATION AND TEMP CHECK ON COMBUSTION AIR MOTOR BEARING (SHOULD BE BELOW 150 F)
- () CHECK CHAIN TENSIONING ON COMBUSTION AIR MOTOR

BURNER CHECK AND TUNING**INDICATORS OF EXCESS COMBUSTION AIR**

- () FIRE IN FIRST SIGHT GLASS IS MORE YELLOW THAN ORANGE.
- () FEW SPARKS IN NEXT TO LAST SIGHT GLASS
- () NO SPARKS IN LAST SIGHT GLASS

INDICATOR OF INADEQUATE COMBUSTION AIR

- () FIRE IN FIRST GLASS IS MORE ORANGE THAN YELLOW
- () NUMEROUS SPARKS IN LAST SIGHT GLASS
- () STRONG SMELL OF SMOKE IN KILN
- () DRIED WOOD ON VERY DARK WITH FLY ASH

Frequency:	Every 7 Days	
Equipment:	240-5430	DRY KILN
Employee:	YOUNG, MIKE C.	