

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Jackson County Port Authority, Port of Pascagoula  
2300 Port Road  
Pascagoula, Jackson County, Mississippi

### “Log Fumigation Project”

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.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

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AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: [DATE]

Permit No.: 1280-00151

## 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 DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a

claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- 1.10 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of 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 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 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 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:

- (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 Mississippi Department of Environmental Quality, Office of Pollution Control.

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

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

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

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

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

- 1.19 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.

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

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

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

- 1.21 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance

or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

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

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

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

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

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

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

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

- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
  - (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 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 11 Mississippi Administrative Code, 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 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.) occurs during 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” or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) Detailed description of testing procedures;
  - (2) Sample calculation(s);
  - (3) Results; and
  - (4) Comparison of results to all “Applicable Rules and Regulations” and to emission limitations in the permit.

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

**SECTION 2. EMISSION POINT DESCRIPTION**

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

<b>Emission Point</b>	<b>Description</b>
AA-000	Facility-Wide (Jackson County Port Authority, Port of Pascagoula)
AA-001	Bulk Log Fumigation Operations [includes two (2) separate locations for the application of methyl bromide fumigant onto logs within a tarpaulin enclosure and the aeration of logs to release residual methyl bromide fumigant to the atmosphere]

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limitation/Standard
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). <b>(Major Source Avoidance Limit)</b>	3.2	Methyl Bromide	250.0 lb/day (calendar day) 9.90 tpy (rolling 12-Month total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	Exhaust Stack Specifications	Stack Height: 60 ft. Inner Diameter: 2 ft.

- 3.1 For Emission Point AA-001, the permittee shall not discharge into the ambient air from a point source any contaminant of such opacity as to obscure an observer’s view to a degree in excess of forty (40) percent opacity. This shall not apply to vision obscuration caused by uncombined water droplets.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)
- 3.2 For Emission Point AA-001, the permittee shall limit the emission of methyl bromide to no more than two hundred fifty (250.0) pounds per day based on a calendar day and no more than 9.90 tons per year based on rolling 12-month total.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). – Major Source Avoidance Limit)
- 3.3 For Emission Point AA-001, the permittee shall construct and operate an exhaust stack no less than sixty (60) feet in height and no less than two (2) feet in inner diameter to vent fumigant gas to the atmosphere.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

## SECTION 4. WORK PRACTICE STANDARDS

Emission Point	Applicable Requirement	Condition Number	Work Practice Standards
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.1	Install and Maintain Signage
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	4.2	Operational Restrictions
		4.3	
		4.4	Fumigant Usage/Measurement Requirements
		4.5	Minimization of Fumigant Leaks
		4.6	Develop and Implement a LDAR Program
		4.7	Aeration System Procedures
		4.8	De-Tarping Procedures

- 4.1 For Emission Point AA-000 (Facility-Wide), the permittee shall install and maintain a sign of a size, shape, construction, and layout approved by MDEQ at the property line and between the Pascagoula River and fumigation site that visibly and legibly notify the public of on-site methyl bromide fumigation operations.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)).
- 4.2 For Emission Point AA-001, the permittee shall conduct bulk log fumigation operations in accordance with the facility best management practices plan (“BMP for Breakbulk SYP Logs at Port of Pascagoula, Ver. 1.0, Rev. Date 2026.04.16”).  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)).
- 4.3 For Emission Point AA-001, the permittee shall restrict the emission of methyl bromide fumigant from bulk log pile fumigation to no more than one (1) aeration event each calendar day within the daily timeframe of 8:00 AM to 5:00 PM.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 4.4 For Emission Point AA-001, the permittee shall determine the usage rate of methyl bromide fumigant in accordance with the following procedures:
- (a) The permittee shall measure the amount of methyl bromide fumigant applied during each log fumigation activity using a scale to weigh the associated fumigant cylinder at the start and end of the respective application period.
  - (b) The permittee shall calibrate the weigh scale in accordance with the manufacturer’s recommendations or a company that is certified to perform such scale calibrations. In addition, the permittee shall complete a calibration of the weigh scale once per calendar year and following any corrective action that necessitates a repair of the weigh scale.

- (c) The permittee shall disconnect the supply line to the fumigant cylinder upon dispensing the desired amount of fumigant (not to exceed 250.0 pounds per day based on a calendar day).
- (d) The permittee shall immediately seal the end(s) of the fumigant supply lines used to dispense methyl bromide fumigant to prevent fugitive emission of methyl bromide.

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

4.5 For Emission Point AA-001, the permittee shall minimize the leak of methyl bromide fumigant during bulk log pile fumigation operations by complying with the following requirements:

- (a) The permittee shall conduct bulk log pile fumigation operations on an impervious surface. However, if log fumigation operations cannot be conducted on an impervious surface, the permittee shall utilize a ground tarpaulin (i.e., “tarp”) or polyethylene sheet to provide an impervious surface on which logs may be stacked.
- (b) The permittee shall conduct bulk log pile fumigation operations in accordance with the facility best management practices plan (“BMP for Breakbulk SYP Logs at Port of Pascagoula, Ver. 1.0, Rev. Date 2026.04.16”).
- (c) The permittee shall inspect tarp(s)/polyethylene sheet(s) for any intrusions (e.g., rips, tears, holes, etc.) prior to commencing log fumigation. If any intrusions are found, the permittee shall employ corrective measures to either completely seal the intrusion(s) or replace the damaged tarp/polyethylene sheet.
- (d) The permittee shall prepare the impervious surface surrounding the bulk log pile to ensure a smooth surface for completely sealing the covering tarp/polyethylene sheet and impervious surface.
- (e) The permittee shall completely seal the top tarp/ethylene sheet (i.e., with sand snakes, water snakes, adhesives, tape, and/or a combination) and impervious surface prior commencing log fumigation in accordance with the facility best management practices plan (“BMP for Breakbulk SYP Logs at Port of Pascagoula, Ver. 1.0, Rev. Date 2026.04.16”).

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

4.6 For Emission Point AA-001, the permittee shall develop and implement a “Leak Detection and Repair” (LDAR) program the complies with the following requirements for log fumigation operations:

- (a) The LDAR program shall identify and monitor all potential sources of leaks including (but not limited to) gas cylinders, fumigation delivery lines, vaporizers, the perimeter of the tarp/polyethylene sheet at ground level, any locations in which tape is used to provide a seal, aeration system ductwork, aeration system fans/blowers, valves, fittings, and/or connections.
- (b) The permittee shall use a leak detection instrument recommended by the United States Department of Agriculture (USDA) to analyze the presence of fumigant gases. Any reading above zero (0) parts per million (ppm) is considered a leak.

In addition, the permittee shall operate, maintain, and calibrate any leak detection monitor in accordance with manufacturer's specifications/recommendations.

- (c) The permittee may employ Section 8.3.2 of EPA Method 21 found in Appendix A of 40 CFR Part 60 ("*Determination of VOC Leaks*") to account for ambient background conditions that may interfere with the LDAR monitoring activities.
- (d) The permittee shall develop a checklist that outlines all potential sources of leaks as identified in paragraph (a) of this condition for use by on-site personnel.
- (e) The permittee shall implement corrective actions when a leak is detected (i.e., any reading above 0 ppm) and conduct follow-up monitoring at the location of the leak to determine the effectiveness of the corrective action(s).

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

4.7 For Emission Point AA-001, the permittee shall operate the aeration system in accordance with the following procedures:

- (a) The permittee shall commence each period of aeration activities in the following manner:
  - (1) Place the blower under the tarp/polyethylene sheet, insert the collapsible duct, or lift the tarp and place it on the top of the blower;
  - (2) Seal the tarp/ethylene sheet along the top, sides, and bottom of the blower using sand snakes;
  - (3) Create an opening on the opposite side of the enclosure to facilitate airflow and adjust the opening as specified within the LDAR program required by Condition 4.6.
- (b) The permittee shall design and implement the blower and aeration ductwork to provide exit stack flow no less than 9,500 cubic feet per minute.

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

4.8 For Emission Point AA-001, the permittee shall conduct de-tarping activities after aeration in accordance with the following procedures:

- (a) The permittee shall not remove the tarp until the fumigant concentration from the bulk log pile is no less than five (5.0) ppm for two (2) consecutive measurements [conducted no less than fifteen (15) minutes apart] with the fan/blower off using a USDA-recommended fumigant monitoring device (e.g., a fumiscope or other comparable device).
- (b) The permittee shall operate, maintain, and calibrate each fumigant monitoring device in accordance with the manufacturer's specifications. However, the permittee shall calibrate each fumigant monitoring device once per calendar year (at minimum).

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

## SECTION 5. MONITORING & RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.2	Exhaust Stack Configuration	Maintain Construction Schematics/Specifications
		5.3	Methyl Bromide Usage Weigh Scale	Monitoring/Recordkeeping Requirements
		5.4	Methyl Bromide	Develop, Complete, and Maintain a “Pre-Fumigation Checklist”
		5.5	LDAR Program Leak Check Verification	Monitoring/Recordkeeping Requirements
		5.6	Aeration Activities Duct Pressure	
		5.7	Fumigant Concentration	

5.1 For Emission Point AA-000 (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. The permittee shall submit copies of such records MDEQ as required by “Applicable Rules and Regulations” or this permit upon request.

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

5.2 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 3.3 by maintaining documentation that outlines the “as-built” construction schematics and/or specifications for exhaust stack associated with the aeration system.

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

5.3 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 3.2, Condition 4.3, Condition 4.4, and Condition 4.5 by maintaining the following information:

- (a) The scale weight of the methyl bromide fumigant cylinder at the beginning and the end of each log fumigation activity as well as the calculated difference in weight;
- (b) The quantity of methyl bromide fumigant used daily (in pounds) and on a rolling 12-month total basis (in tons);

- (c) The date, starting time, and ending time for each period of log fumigation;
- (d) Documentation that pertains to the calibration of the weigh scale and any maintenance actions performed on the weigh scale, including (but not limited to) each “date of calibration” and the “calibration specifications;”
- (e) Confirmation that the ends of the fumigant lines were taped or mechanically shut at the end of fumigation application.

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

5.4 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 4.4 by developing, completing, and maintaining a “pre-fumigation checklist” that includes (but not limited to) the following information:

- (a) The date and time of the inspection;
- (b) The name and title of the individual(s) conducting the inspection;
- (c) The weather conditions at the time of the inspection and the source(s) for such data in accordance with the facility best management practices plan (“BMP for Breakbulk SYP Logs at Port of Pascagoula, Ver. 1.0, Rev. Date 2026.04.16”);
- (d) Confirmation that the fumigation activity will be conducted on an impervious surface;
- (e) Confirmation that each sampling line is placed in the appropriate location prior to the introduction of fumigant to the enclosure;
- (f) The condition of the covering tarp/polyethylene sheet and impervious surface at the time of inspection and any repairs that must be completed;
- (g) Confirmation that the area surrounding the bulk log pile has been prepared to ensure a complete seal between covering tarp/polyethylene sheet and impervious surface; and
- (h) Confirmation that the entire perimeter of the covering tarp/ethylene sheet and impervious surface have been sealed.

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

5.5 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 4.6 by maintaining the following information:

- (a) Documentation that identifies all potential sources of leaks as specified in Condition 4.5(a);
- (b) Documentation that pertains to the calibration of each leak detection monitor – including (but not limited to) each “date of calibration” and the “calibration specifications”;
- (c) Documentation that outlines the recommendations/specifications prescribed by the manufacturer of the leak detection monitor;
- (d) The permittee shall develop and complete a “LDAR checklist” – as specified in Condition 4.5(d) – that includes (but not limited to) the following information:
  - (1) The name and title of that individual that will perform the leak detection monitoring event.

- (2) The date, time, and location of each monitoring event.
- (3) The permittee shall perform and document “leak check” on the overall fumigant delivery system at the onset of each fumigation activity (i.e., when the fumigant cylinder is opened), which shall include (but not limited to) the following items [at a distance no more than three (3) inches away]:
  - (i) The fumigant gas cylinder;
  - (ii) The gas fumigation tubing;
  - (iii) The vaporizer apparatus; and
  - (iv) All fittings and connections associated with the system.

If a leak is detected (i.e., a reading above 0 ppm), the permittee shall immediately repair the leak as well as document the location of the leak, the corrective action(s) taken, and the readings from the leak detection monitor before and after the corrective action(s) taken.

- (4) The permittee shall monitor leaks at (but not limited to) ground level along the perimeter [at a distance no more than three (3) inches away] of the enclosure from the onset of each fumigation activity until the end of fumigant dispersion (i.e., when the fumigant cylinder is closed) at all locations in which gas sampling lines, fumigant supply lines, monitoring line, and/or electrical cords either enter or exit the enclosure.

If a leak is detected (i.e., a reading above 0 ppm), the permittee shall immediately repair the leak as well as document the location of the leak, the corrective action(s) taken, and the reading from the detection device before and after the corrective action(s).

- (5) The permittee shall monitor leaks along the perimeter [at a distance no more than three (3) inches away] of each opening for aeration activities. If a leak is detected (i.e., a reading above 0 ppm), the permittee shall document the presence of a leak and reduce the size of the opening and recommence monitoring. The permittee shall continue monitoring and maintain the corresponding documentation until no leaks are detected.
- (6) The permittee shall monitor leaks from the overall aeration system at the onset of aeration activities that include (but not limited to) the following locations [at a distance no more than three (3) inches away]:
  - (i) The exhaust point for the aeration system (i.e., the location for which the port exits the enclosure);
  - (ii) The corresponding fan/blower for the aeration system; and
  - (iii) All valves, fittings, and/or connections associated with the overall aeration system.

If a leak is detected (i.e., a reading above 0 ppm), the permittee shall immediately repair the leak as well as document the location of the leak, the corrective action(s) taken, and the reading from the leak detection device before and after the corrective action(s).

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

- 5.6 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 4.6 by maintaining the following information:
- (a) Documentation verifying the installed fixed flow fan has a volume flow rate sufficient to generate a stack exit velocity as defined in Permit Condition 4.6(b). This documentation shall include the vendor data/specification sheet.
  - (b) The respective start time and end time of each aeration activity.

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

- 5.7 For Emission Point AA-001, the permittee shall demonstrate compliance with Condition 4.7 by maintaining the following information prior to de-tarpping a fumigated bulk log pile:
- (a) The name and title of that individual that performs the monitoring of fumigant gas;
  - (b) The make and model of each fumigant monitoring device used;
  - (c) Documentation that pertains to the calibration of each fumigant monitoring device and any maintenance actions performed on a fumigant monitoring device – including (but not limited to) each “date of calibration” and the “calibration specifications”;
  - (d) Documentation that outlines the recommendations/specifications prescribed by the manufacturer of the fumigant monitoring device; and
  - (e) Confirmation that all fumigant concentration measurements taken from all monitoring lines are at or below five (5) ppm, collected in accordance with Condition 4.7 as well as the date and time of each measurement.

(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-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report a Deviation Within Five (5) Working Days
		6.1(b)	Semi-Annual Reporting Requirements
		6.1(c)	Responsible Official Certification Requirements
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.5.C(2).	6.1(d)	Notify MDEQ on the Commencement of Actual Construction
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notify MDEQ on the Suspension/Termination of Proposed Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.5.D(1) and (3).	6.1(f)	Notify MDEQ on the Completion of Construction Activities
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.5.D(2).	6.1(g)	Notify MDEQ on Changes in Proposed Construction
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit a Semi-Annual Monitoring Report
		6.3	Submit LDAR-Related Documentation

### 6.1 General Reporting Requirements:

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

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

- (b) Beginning upon certifying completion of construction activities and lasting until issuance or modification of the applicable operating permit, the permittee shall submit a certified semi-annual report that contains all monitoring data and /or records required by Section 6 of this permit no later than January 31 and July 31 of each calendar year for the preceding six-month period. All instances of deviations from the permit requirements specified herein must be clearly identified in such each report.

Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating, the permittee shall report as such and include an estimated date on the 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 MDEQ shall contain a certification signed by a Responsible Official (RO) that affirms (based on information

and belief formed after reasonable inquiry) the statements and information in the document are true, accurate, and complete.

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

- (d) The permittee shall notify MDEQ of the commencement of actual construction no later than fifteen (15) days after the event.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.5.C(2).)

- (e) The permittee shall notify MDEQ of when construction does not begin within eighteen (18) months of permit 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 completing the construction or installation of an approved stationary source or modification (and prior to commencing operation), the permittee shall notify MDEQ that construction or installation was performed in accordance with the approved plans and specifications on file with MDEQ no later than fifteen (15) days after the event.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) and 2.5.D(1) and (3).)

- (g) The permittee shall promptly notify MDEQ of any change in construction from the previously approved plans and specifications or permit. If MDEQ 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. 2.2.B(11) and 2.5.D(2).)

6.2 For Emission Point AA-001, the permittee shall submit a certified semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that contains the following information:

- (a) The quantity (in pounds) of methyl bromide fumigant used daily;
- (b) The total emission (in tons) of methyl bromide based on both a monthly and rolling 12-month total basis;
- (c) The number of days each month in which log fumigation activities and aeration activities were performed;
- (d) Each “pre-fumigation checklist” completed in accordance with Condition 5.4;
- (e) Certification that the permittee complied with all work practice standards and monitoring/recordkeeping requirements associated with the LDAR program during the semi-annual period;
- (f) The completed “LDAR checklist” and the corresponding information [as specified by Condition 5.5(d)] for each instance in which a leak was detected. If no leak was detected during the reporting period, the permittee shall certify report a negative declaration; and

- (g) A summary of any revision(s) made to the facility's best management practices plan ("BMP for Breakbulk SYP Logs at Port of Pascagoula, Ver. 1.0, Rev. Date 2026.04.16").

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

6.3 For Emission Point AA-001, the permittee shall submit the following information associated with LDAR program no later than thirty (30) days after issuance of this permit:

- (a) The standard template for each checklist and form to be completed by an individual that performs an activity associated with bulk log fumigation operations (including fumigant gas monitoring);
- (b) Documentation that outlines the manufacturer's specifications/recommendations for each weigh scale, leak detection device, fumigation monitoring device; and
- (c) Documentation that identifies all potential sources of leaks as specified in Condition 4.5(a).

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