

**STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT**

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

THIS CERTIFIES THAT

Barge Forest Products Company
900 Buggs Ferry Road
Macon, Noxubee County, Mississippi

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

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: September 15, 2020

Permit No.: 2000-00005

Effective Date: As specified herein.

Expires: August 31, 2025

SECTION 1

A. GENERAL CONDITIONS

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

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

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

(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166; or
 - (1) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I, or 40 CFR 51.166;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51 – Subpart I or 40 CFR 51.166; or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C.(15).)

B. GENERAL OPERATIONAL CONDITIONS

1. Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – *Regulations for the Prevention of Air Pollution Emergency Episodes* for the level of emergency declared.

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

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10 – *“Provisions for Upsets, Start-Ups, and Shutdowns”*.

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

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

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

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

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

- (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Rule 1.10.B.(2)(a) through (e).
- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

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

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

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any “Applicable Rules and Regulations” or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all “Applicable Rules and Regulations” and to emission limitations in the permit.

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

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

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

If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or

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

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

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

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

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

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

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - (a) Persistent violation of any terms or conditions of this permit.
 - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

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

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

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-100	Facility-Wide (Barge Forest Products Company)
AA-001	27.8 MMBTU / Hour Multiple Fuel-Fired Boiler [capable of combusting wood waste, used oil, and diesel as fuel sources; equipped with a cyclone; manufactured after June 1989]
AA-002	Planer Mill [includes pneumatic dust conveyance and load-out system; equipped with two (2) cyclones]
AA-003	Sawmill Area [includes two (2) primary sawing systems – each with 3-D scanning systems and chippers, one (1) resaw, one (1) trimmer, one (1) supplemental resaw, two (2) wood chippers, a pneumatic dust conveyance system with two (2) cyclones, and two (2) truck load-out bins]
AA-004	Three (3) Indirect-Fired, Steam-Heated Lumber Drying Kilns
AA-005	Lumber Dip Tank
AA-007	2,000-Gallon Diesel Storage Tank

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.3	PM (filterable only)	$E = 4.1 (p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). (Major HAP Source / Title V Avoidance Limit)	3.4	Lumber Throughput	35,000,000.0 Board Feet (12-Month Rolling Total)
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.5	PM	No Bypass of Air Pollution Control Equipment
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(2).	3.6	PM	0.30 Grains / Standard Cubic Foot
	40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.40c(a); Subpart Dc	3.7	SO ₂	General Applicability
	40 CFR 60.42c(d) and (i); Subpart Dc	3.8		0.5 wt.% Sulfur Content in Used Oil and Diesel Fuel
	40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63.11194(a)(1) and 63.11200(b); Subpart JJJJJ	3.9	HAPs	General Applicability
	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.10	SO ₂	4.8 Pounds / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.11	Used Oil / Diesel Usage	2,000 Gallons (12-Month Rolling Total)
	AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.12	VOCs

3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air that exceeds forty percent (40%) opacity from any manufacturing or industrial process except as provided in Parts (a) and (b):

- (a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one 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.)

3.2 For Emission Point AA-100 (Facility-Wide), unless otherwise specified herein, the permittee shall not discharge into the ambient (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. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.3 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein or as applicable, 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).)

3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the total throughput of dimensional lumber processed through any specific process area (i.e. the sawmill, the combined lumber drying kilns, and the planer mill) to no more than 35,000,000.0 board feet based on a 12-month rolling total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).; Major HAP Source / Title V Avoidance Limit)

- 3.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall not allow particulate matter emissions to bypass the cyclone(s) associated with a corresponding process unit. During any period when a cyclone malfunctions and/or is non-operational, the permittee shall cease operations at the associated process unit until such time the cyclone returns to operation.

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

- 3.6 For Emission Point AA-001, which combusts wood waste and diesel fuel to produce steam through indirect means, the permittee may emit particulate matter (PM) at a rate not to exceed 0.30 grains per standard cubic foot.

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

- 3.7 Emission Point AA-001 is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

(Ref.: 40 CFR 60.40c(a); Subpart Dc)

- 3.8 For Emission Point AA-001, the permittee shall not combust diesel fuel or used oil within the boiler that contains more than 0.5 weight percent (wt.%) sulfur content.

(Ref.: 40 CFR 60.42c(d); Subpart Dc)

- 3.9 Emission Point AA-001 is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

For the purpose of this subpart, Emission Point AA-001 is considered a “*biomass*” boiler.

(Ref.: 40 CFR 63.11194(a)(1) and 63.11200(b); Subpart JJJJJ)

- 3.10 For Emission Point AA-001, the maximum discharge of sulfur dioxides shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input.

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

- 3.11 For Emission Point AA-001, the permittee shall limit the total volume of used oil and diesel combusted in the boiler to no more than 2,000 gallons based on a 12-month rolling total basis.

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

- 3.12 For Emission Point AA-004, the permittee shall limit the emission of volatile organic compounds (VOCs) from each lumber drying kiln to no more than 4.10 pounds per thousand board feet (MBF) processed.

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

**SECTION 4
WORK PRACTICE STANDARDS**

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Work Practice Standard
AA-001	40 CFR 63.11205(a); Subpart JJJJJ	4.1	HAPs	General Duty Clause
	40 CFR 63.11223(b); Subpart JJJJJ	4.2	CO HAPs	Conduct Biennial Performance Tune-Ups

4.1 For Emission Point AA-001, the permittee shall operate and maintain each boiler (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.

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

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

4.2 For Emission Point AA-001, the permittee shall conduct a performance tune-up on each boiler biennially no later than twenty-five (25) months after the previously completed tune-up. Each tune-up shall be conducted in accordance with the following provisions:

- (a) Inspect the burner (as applicable) and clean / replace any components of the burner as necessary. A burner inspection may be delayed until the next boiler shutdown but shall not to exceed thirty-six (36) months after the previous inspection.
- (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. An adjustment should be consistent with the manufacturer's specifications (if available).
- (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. An inspection may be delayed until the next boiler shutdown but shall not to exceed 36 months after the previous inspection.
- (d) Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxide (NO_x) requirement to which a boiler is subject.

- (e) Measure the concentrations in the effluent stream of CO in parts per million by volume (ppm_v) and oxygen (O₂) in volume percent (vol.%) before and after the adjustments are made. The measurements may be either on a wet or dry basis as long as the basis remains the same before and after the adjustments are made. The measurements may be taken using a portable CO analyzer.

- (f) The permittee shall document and maintain on-site the following information collected during a tune-up:
 - (1) The date of the tune-up;
 - (2) The procedures followed for the tune-up;
 - (3) The manufacturer's specifications to which the boiler was tuned;
 - (4) The concentration of CO in the effluent stream in ppm_v and O₂ in vol.% measured at high fire or the typical operating load before and after the tune-up of a boiler;
 - (5) A description of any corrective action taken as a part of the tune-up of a boiler; and
 - (6) The type and amount of fuel used over the last twelve (12) months prior to tune-up of a boiler but only if the unit was physically and legally capable of using more than one type of fuel during that period.

- (g) If a boiler is not operating on the required date for the tune-up, the permittee shall conduct the tune-up within thirty (30) days of start-up.

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

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement(s)
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	Opacity	Perform and Record Weekly Visible Emission Observations
		5.3	PM	Perform and Record Monthly Inspections on Cyclones
AA-001	40 CFR 60.48c(g)(2); Subpart Dc	5.4	SO ₂	Monitor and Record the Quantity of Each Fuel Source Combusted (Monthly)
	40 CFR 60.42c(h)(1); Subpart Dc	5.5		Maintain Fuel Certification Records (Oil and Diesel Fuel)
	40 CFR 63.11225(c)(4) and (5); Subpart JJJJJ	5.6	HAPs	Record Information Pertaining to Periods of Boiler Malfunction
AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.7	Lumber Throughput	Monitor and Maintain the Throughput for Dried Lumber from All Kilns (Monthly and 12-Month Rolling Total)
AA-005	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	VOCs HAPs	Maintain Documentation on Chemical Specifications

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

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

5.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall perform and record a weekly visible emission observation in accordance with EPA Test Method 22 on the exhaust of each cyclone during representative operating conditions and daylight hours.

If visible emissions are detected during an observation, a visible emission evaluation (VEE) in accordance with EPA Method 9 shall then be performed and recorded by

certified personnel. The overall observation period for a VEE shall last (at a minimum) six (6) consecutive minutes.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date / time when visual emission observations were performed. Additionally, in the event that a VEE is required but not performed, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

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

- 5.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall perform and record a monthly inspection of each cyclone to evaluate the performance capability. If a problem is noted with a cyclone during an inspection, the permittee shall perform and record the maintenance necessary to ensure operation as originally designed.

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

- 5.4 For Emission Point AA-001, the permittee shall monitor and record the quantity (either in pounds or gallons) each fuel source combusted in the boiler monthly.

(Ref.: 40 CFR 60.48c(g)(2); Subpart Dc)

- 5.5 For Emission Point AA-001, the permittee shall maintain the documentation that demonstrates the oil or diesel fuel combusted in the boiler complies with the sulfur content restriction outlined in Condition 3.7.

(Ref.: 40 CFR 60.42c(h)(1); Subpart Dc)

- 5.6 For Emission Point AA-001, the permittee shall record the following information for each boiler as it pertains to periods of malfunction:

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

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

- 5.7 For Emission Point AA-004, the permittee shall monitor and record the total throughput of lumber dried in the combined lumber drying kilns in board feet both on a monthly basis and a 12-month rolling total basis.

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

5.8 For Emission Point AA-005, the permittee shall maintain documentation that indicates the following information for any chemical used to treat lumber (insecticides; fungicides; inhibitor solutions; etc.) that contains a volatile organic compound (VOC) or a hazardous air pollutant (HAP).

- (a) The product name and identification;
- (b) The density (in pounds per gallon);
- (c) The weight percentage (wt.%) of the VOC content (as applicable); and
- (d) The wt.% of any HAP content (as applicable).

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

SECTION 6
REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement(s)	Condition Number	Reporting Requirement(s)
AA-100	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.1	Report Deviation from Requirements Within Five (5) Working Days
		6.2	Submit a Certified Semi-Annual Monitoring Report (SMR)
		6.3	Submit Documents Certified by a Responsible Official
		6.4	Submit Facility-Wide Operational Data in a SMR
AA-001	40 CFR 60.48c(e)(11), (f)(1), and (j); Subpart Dc	6.5	Submit Certifications for Fuel Sources Combusted in a SMR
	40 CFR 63.11225(b)(1) – (3); Subpart JJJJJ	6.6	Submit Biennial Certification of Compliance

6.1 For Emission Point (Facility-Wide), except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective action(s) and/or preventive measures taken. The report shall be submitted to the MDEQ within five (5) working days of the time the deviation began.

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

6.2 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall submit a certified semi-annual monitoring report (SMR) postmarked no later than January 31st and July 31st of each year for the preceding six-month period. This report shall contain any required monitoring specified in Section 6 of this permit. Additionally, all instances of deviations from permit requirements shall be clearly identified within the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

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

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

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

- 6.4 For Emission Point AA-100 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.2 that contains the following information:
- (a) A summary detailing any maintenance action(s) performed on a cyclone;
 - (b) A summary detailing the date(s) and corresponding duration (in hours) in which a cyclone was non-operational;
 - (c) The total respective volume (in gallons) of used oil and diesel fuel combusted in the boiler on a 12-month rolling total basis; and
 - (d) The total throughput (in board feet) of lumber dried in the combined kilns on a 12-month rolling total basis; and

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

- 6.5 For Emission Point AA-001, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.2 that details the fuel supplier certifications required by Condition 5.5.

The report shall include a certified statement signed by a Responsible Official (RO) that verifies the submitted records represent all of the fuel combusted during the reporting period (as applicable). A fuel supplier certification shall specifically contain the following information contingent upon the fuel source:

- (a) For Distillate Oil:
 - (1) The name of the oil supplier;
 - (2) A statement from the corresponding supplier that the utilized fuel oil / diesel fuel complies with the specifications under the definition of distillate oil. For the purpose of this permit, “*distillate oil*” is defined as follows:
 - (i) Fuel oil that complies with fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials (ASTM) in Method D396;
or
 - (ii) Diesel fuel oil numbers 1 or 2, as defined by the ASTM in Method D975.
 - (3) The sulfur content or maximum sulfur content of the oil.
- (b) For Residual Oil:

- (1) The name of the oil supplier;
- (2) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil (specifically including whether the oil was sampled as delivered to the facility, whether the sample was drawn from oil in storage at the oil supplier's facility, or at another location);
- (3) The sulfur content of the oil from which the shipment came (or of the shipment itself); and
- (4) The method used to determine the sulfur content of the oil.

(Ref.: 40 CFR 60.48c(e)(11), (f)(1) – (2), and (j); Subpart Dc)

6.6 For Emission Point AA-001, the permittee shall submit a compliance certification postmarked by March 15th of the calendar year immediately following the completion of a performance tune-up for a boiler. The report shall contain (at a minimum) the following information:

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

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

- (1) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up each boiler unit"; and
- (2) "This facility complies with the requirement in 40 CFR 63.11214(d) and 40 CFR 63.11223(g) to minimize the boiler's time spent during start-up and shutdown and to conduct start-ups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if the manufacturer's recommended procedures are not available."
- (3) Any deviation from applicable requirements during the reporting period [which shall also include a description of the deviation(s), the time period(s) during which the deviation(s) occurred, and the corrective action(s) taken].

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