

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

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Weyerhaeuser NR Company, Philadelphia Facility
1016 Weyerhaeuser Road
Philadelphia, Neshoba 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: June 13, 2022

Permit No.: 1920-00012

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-000	Facility-Wide (Weyerhaeuser NR Company, Philadelphia Facility)
AA-030	Sawmill Operations [includes sawing, debarking, and bark handling activities – <i>fugitive</i>]
AA-031	Planer Trim Hog Cyclone
AA-032	Primary Planer Shavings Cyclone
AA-033	Fuel House – Green Fiber Cyclone [to be used as a back-up cyclone when both CDK fuel bin cyclones are down for maintenance]
AA-034	Green Chip Truck Bin Cyclone [conveys green lumber scrap generated at the sawmill area to a storage area for eventual truck loading]
AA-035	Haul Roads [paved, unpaved, and covered with base course – <i>fugitive</i>]
AA.038	No. 5 Continuous Direct-Fired Lumber Drying Kiln (CDK-5) [equipped with 35 MMBTU / hour wood waste-fired grate gasifier and abort stack]
AA-039	No. 6 Continuous Direct-Fired Lumber Drying Kiln (CDK-6) [equipped with 35 MMBTU / hour wood waste-fired grate gasifier and abort stack]
AA-043	No. 7 Continuous Direct-Fired Lumber Drying Kiln (CDK-7) [equipped with 30 MMBTU / hour wood waste-fired grate gasifier, an abort stack, and a bypass stack]
AA-044	CDK-7 Fuel Bin Cyclone (CDKC-7) [conveys green sawdust generated at the sawmill area to the fuel silo for CDK-7]

SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued March 17, 2005; Modified May 22, 2008, February, 2009, October 15, 2018, and June 13, 2022 (PSD BACT Limit)	3.1	Lumber Throughput	325,000 MBF / Year (Combined Kilns; Rolling 12-Month Total)
AA-038 AA-039 AA-043	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued March 17, 2005; Modified May 22, 2008, February, 2009, October 15, 2018, and June 13, 2022 (PSD BACT Limits)	3.2	VOCs (as WPP1)	4.52 Pounds / MBF; and 734.5 tpy (Rolling 12-Month Rolling Total; Combined Kilns)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued October 15, 2018 and modified June 13, 2022 (PSD BACT Limit)	3.3	Final Moisture Content	12.0% or Greater (Monthly Average)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued September 26, 2014 and modified in PSD Permit to Construct issued June 13, 2022	3.4	Fuel Source Restriction	Combust Uncontaminated Wood Waste and Char (Diesel May be Used During a Start-Up Period)
AA-043	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.5	Opacity (Smoke)	≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.6	Opacity	
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.7	HAPs	General Applicability

- 3.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the throughput of lumber through any process area (i.e. the sawmill / green trimmer area; the collective lumber drying kilns; the planer mill area) to no more than 325,000.0 thousand board feet (MBF) (or 325.0 million board feet – MMBF) per year based on a rolling 12-month total basis.

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[Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued March 17, 2005; Modified May 22, 2008, February, 2009, October 15, 2018, and June 13, 2022 – PSD BACT Limit)]

- 3.2 For Emission Point AA-038, AA-039, and AA-043, the permittee shall limit the emission of volatile organic compounds as determined by Wood Protocol 1 (VOC as WPP1) from each kiln to no more than 4.52 pounds per MBF. Additionally, the permittee shall limit the total emission of VOCs (as WPP1) from the all kilns combined to no more than 734.5 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), as established in PSD Permit to Construct issued March 17, 2005; Modified May 22, 2008, February, 2009, October 15, 2018, and June 13, 2022 – PSD BACT Limits)

- 3.3 For Emission Point AA-038, AA-039, and AA-043, the permittee shall limit the final moisture content of lumber dried within kiln to at least twelve (12.0) percent based on a monthly average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in PSD Permit to Construct issued October 15, 2018 and modified June 13, 2022 – PSD BACT Limit)

- 3.4 For Emission Point AA-038, AA-039, and AA-043, the permittee shall only combust uncontaminated wood waste and char within each kiln burner. For the purpose of this permit, “uncontaminated wood waste” is defined as any by-product generated from processing harvested timber/ dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue, and “char” is defined as the by-product from the combustion of “uncontaminated wood waste”.

The permittee may purchase uncontaminated wood waste from third-party sources only if it meets the aforementioned definition. Additionally, the permittee may utilize no more than ten (10) gallons of diesel to ignite a fuel bed within a kiln burner during a start-up period.

[Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued September 26, 2014 and modified in PSD Permit to Construct issued June 13, 2022 (to include AA-043)]

- 3.5 For Emission Point AA-043, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing or industrial process, which exceeds forty (40) percent opacity subject to the following exceptions:

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty (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.)

- 3.6 For Emission Point AA-043, 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.)

- 3.7 For Emission Point AA-043, the permittee is subject to and comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standard for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A – General Provisions (as required by Table 10 of Subpart DDDD).

For the purpose of this permit, Emission Point AA-043 is only subject to an initial notification requirement. This requirement was satisfied with the receipt of the PSD Permit to Construct application on November 12, 2021.

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

SECTION 4. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Work Practice
AA-038 AA-039 AA-043	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) (PSD BACT Standard)	4.1	VOCs	Implement and Maintain a Good Work Practices Plan

4.1 For Emission Points AA-038, AA-039, and AA-043, the permittee shall implement and maintain a “Good Work Practices Plan” that establishes work practice standards in accordance with the manufacturer’s recommendations for continuous direct-fired kiln operations. The plan shall establish a routine for conducting inspections and preventative maintenance on the kiln that includes (at a minimum) the following actions:

- (a) Conducting walk-around inspections;
- (b) Confirming proper wet-bulb operation;
- (c) Conducting entrance / exit baffle and damper inspections;
- (d) Checking wet-bulb wicks for integrity;
- (e) Greasing the kiln cart wheels and fan shaft bearings;
- (f) Conducting circulation, exhaust, and combustion air fan inspections;
- (g) Checking hydraulic oil levels;
- (h) Calibrating moisture content equipment (as applicable);
- (i) Calibrating temperature probe equipment;
- (j) Conducting burner clean-outs and tune-ups;
- (k) Checking for leaks in kiln pipe-work;
- (l) Checking shaft seals at wall penetrations (as applicable);
- (m) Conducting rotary air locks and fuel blowers inspections;
- (n) Conducting recirculation, ignition, combustion, over-fire and bridge wall blowers inspections; and
- (o) Conducting wood feed screws and kiln burners inspections.

The permittee shall perform all inspections and maintenance actions on the schedule specified in the plan. However, if any problem is noted during an inspection, the permittee

shall perform the necessary corrective maintenance to ensure the operation of the kiln as originally designed.

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

SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	40 CFR 52.21(r)(6)(iii); Subpart A	5.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable)	Calculate and Maintain Project-Related Emissions Increases
AA-031 through AA-034 AA-044	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.3	PM / PM ₁₀ / PM _{2.5} (filterable only)	Maintain a Certification on Removal Efficiency
AA-038 AA-039 AA-043	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.4	Dried Lumber Throughput VOCs	Monitor the Total Throughput and Total Emissions from the Combined Kilns (Monthly and 12-Month Rolling Total)
		5.5	VOCs	Maintain Inspections / Maintenance Actions Performed for the Good Work Practices Plan
		5.6	Final Moisture Content	Continuously Monitor the Moisture Content of Dried Lumber Processed through the Planer Mill Determine the Average Moisture Content (Monthly Average)
		5.7	PM / PM ₁₀ / PM _{2.5}	Monitor Date, Time, and Duration of Each Start-Up / Shutdown / Idling Period Calculate Total Duration of All Applicable Periods (Rolling 12-Month Period)
AA-044	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.8	PM / PM ₁₀ / PM _{2.5} (filterable only)	Conduct a Monthly Visible Emission Observation
		5.9		Conduct a Monthly Inspection

5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes (but is not limited to) all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to the MDEQ as required by Applicable Rules and Regulations of this permit upon request.

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

- 5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor the respective emission increase of filterable particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable + condensable), and particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$; filterable + condensable) as a result of the construction project proposed in the permit application received on November 12, 2021.

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

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

- 5.3 For Emission Point AA-031 through AA-034 and AA-044, the permittee shall maintain documentation [manufacturer's guarantee; stack testing data; EPA guidance; National Council for Air and Stream Improvement (NCASI) guidance; etc.] for each cyclone that supports the filterable particulate matter (PM) emission estimates.

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

- 5.4 For Emission Points AA-038, AA-039, and AA-043, the permittee shall monitor the total throughput of lumber dried within the combined kilns in thousand board feet (MBF) both a monthly and a 12-month rolling total basis.

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

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

- 5.5 For Emission Points AA-038, AA-039, and AA-043, the permittee shall maintain documentation that detail the results of each inspection and/or maintenance action (preventative or unscheduled) performed on each kiln in accordance with the "Good Work Practices Plan" outlined in Condition 4.1.

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

- 5.6 For Emission Points AA-038, AA-039, and AA-043, the permittee shall demonstrate compliance with moisture content limitation specified in Condition 3.3 by continuously monitoring and maintaining the moisture of dried lumber processed in the planer mill area in order to determine the average final moisture content based on a monthly basis.

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

- 5.7 For Emission Points AA-038, AA-039, and AA-043, the permittee shall monitor and record the date, time, and duration of each start-up, shutdown, and idling period experienced by

each kiln burner in which emissions are diverted to a corresponding abort stack and/or bypass stack. For the purpose of this permit, an “idling period” is considered the operation of a kiln burner at a heat input rate equal to / less than 5.5 MMBTU per hour.

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

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

- 5.8 For Emission Point AA-044, the permittee shall perform a monthly visible emission observation in accordance with EPA Test Method 22 on the exhaust 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 for (at a minimum) a duration of six (6) consecutive minutes. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by EPA Test Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted.

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

- 5.9 For Emission Point AA-044, the permittee shall perform an inspection on the cyclone monthly (or more often if necessary) to ensure proper operation. An inspection shall (at a minimum) evaluate the following components:

- (a) Blowers;
- (b) Air lock valves;
- (c) Fans; and
- (d) Any piping associated with the cyclone.

If any problem is noted during an inspection, the permittee shall conduct the necessary maintenance activities to ensure operation of the cyclone as originally designed.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return the cyclone to operation as originally designed.

(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 Deviations Within Five (5) Working Days
		6.1(b)	Submit a Semi-Annual Report
		6.1(c)	Submit a 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
	40 CFR 52.21(r)(6)(v); Subpart A	6.2	Submit Calculated Annual Emissions
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	6.3	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

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include an estimated date of commencement of construction and/or start-up (whichever is applicable).

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

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

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

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

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

- (e) The permittee must notify 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.

(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-000 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 – when applicable) of each year for the preceding 12-month calendar year that contains the information specified in paragraphs (a) – (c) of this condition **if** the calculated annual emission required by Condition 5.1 either exceed the baseline actual emissions documented for PM, PM₁₀, and PM_{2.5} in the pre-construction Prevention of Significant Deterioration (PSD) major modification applicability test by a “significant” amount [as defined in 40 CFR 52.21(b)(23); Subpart A] or differ from the established pre-construction projected emission presented in the revised permit application received on November 12, 2021.

- (a) The name, address, and telephone of the facility;
- (b) The calculated annual emissions as required by Condition 5.2; and
- (c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections).

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

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

- (a) The total throughput (in thousand board feet) of lumber dried by the combined kilns both on a monthly and rolling 12-month total basis;
- (b) The total emission of volatile organic compounds (VOCs) from the combined kilns both on a monthly and a rolling 12-month total basis;
- (c) Any changes that have been made to the “Good Work Practices Plan” required by Condition 4.1;
- (d) The average moisture content of all dried lumber processed during each month; and
- (e) The total duration of all start-up, shutdown, and idling periods for the combined kilns in which emissions are diverted to the corresponding abort stack and/or bypass stack based on a rolling 12-month total.
- (f) For Emission Point AA-043, an outline of any maintenance (either corrective or preventative conducted on the cyclone.

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