

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

**TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Gloster Forest Products, LLC  
700 East Railroad Avenue  
Gloster, Amite 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**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: March 14, 2023**

**Permit No.: 0080-00059**

**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

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	Facility ID	Description
AA-000	—	Facility-Wide [Gloster Forest Products, LLC]
AA-001a	CDK1	Continuous Direct-Fired Lumber Drying Kiln No. 1 [equipped with a 40 MMBTU/hr wood-fired burner or 40 MMBtu natural gas burner]
AA-001b	AS1	Abort Stack for CDK1
AA-002a	CDK2	Continuous Direct-Fired Lumber Drying Kiln No. 2 [equipped with a 40 MMBTU/hr wood-fired burner or 40 MMBtu natural gas burner]
AA-002b	AS2	Abort Stack for CDK2
AA-003	CDK3	Continuous Direct Fired Lumber Drying Kiln No. 3 [equipped with a 40 MMBTU/hr natural gas-fired burner]
AA-004	FC1	CDK1 Fuel Silo Cyclone
AA-005	FC2	CDK2 Fuel Silo Cyclone
AA-006	PC1	Planer CycloFilter [controls emissions from the pneumatic transfer of green sawdust]
AA-007	Fugitives	Sawmill Operations [includes debarking, sawing, chipping, haul roads, and residual material handling and storage]



## 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, R. 1.3.F.(1).	3.1	PM (filterable)	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	40%
AA-001a AA-002a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10).	3.3	Fuel Source Restriction	Combust Only Uncontaminated Wood Waste or Natural Gas
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), and R. 1.10.B.	3.4	Start-Up / Shut-Down Requirement	Route Gasifier Emissions to Abort Stack for $\leq 68$ Hours (Rolling 12-Month Total for Each Stack)
AA-001a AA-002a AA-003	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) <b>PSD BACT Limits</b>	3.5	VOCs (as WPP1)	4.34 lb/MBF 651.0 tpy (Rolling 12-Month Totals for All Kilns Combined)
		3.6	Dried Lumber Throughput	300.0 MMBF/yr (Rolling 12-Month Total for All Kilns Combined)
		3.7	Final Moisture Content	$\geq 10.0\%$ (30-Day Block Average)
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b), Subpart DDDD	3.8	HAPs	General Applicability
AA-001b AA-002b	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.9	Opacity (from smoke)	40%
AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j) <b>PSD BACT Standard</b>	3.10	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Operate Control Equipment at All Times When the Air Emissions Equipment is Operating
AA-007	11 Miss. Admin. Code Pt. 2, Ch. 5 and 40 CFR 52.21(j) <b>PSD BACT Standard</b>	3.11	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Requirements for Minimizing Fugitive Emissions

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks,

vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

$$E = 4.1(p^{0.67})$$

Where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).)

- 3.2 For Emission Point AA-000 (Facility-Wide), 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 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 Points AA-001a and AA-002a, the permittee shall only utilize natural gas or uncontaminated wood waste as a fuel source. For the purpose of this permit, “uncontaminated wood waste” is defined as any by-product generated from processing harvested timber and/or dried lumber (i.e. sawdust, bark, wood chips, shavings, etc.) that does not possess an artificial coating or residue.

Additionally, the permittee may purchase uncontaminated wood waste from third-party sources if the material meets the aforementioned definition.

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

- 3.4 For Emission Points AA-001a and AA-002a, the permittee shall direct the emissions from each burner to the corresponding kiln at all times, except during periods of burner start-up and shutdown.

During periods of start-up or shutdown, the permittee may vent emissions from each burner to the corresponding abort stack (i.e., Emission Points AA-001b and AA-002b). The permittee shall limit the duration in which emissions are vented through each abort stack to no more than sixty-eight (68) hours per year based on a rolling 12-month total. Once the 68 hours threshold is met, the permittee shall either direct burner emissions to the corresponding kiln or cease operation of the burner.

Use of the abort stacks for any purpose other than the start-up or shutdown of the dryers constitutes a deviation of this permit and is subject to the deviation reporting requirements specified in Condition 6.1(a).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), and R. 1.10.B.)

- 3.5 For Emission Points AA-001a, AA-002a, and AA-003, the permittee shall limit the emission of volatile organic compounds as determined by “Wood Products Protocol 1”

(VOCs as WPP1) from each kiln to no more than 4.34 pounds per thousand board feet (lb/MBF).

Additionally, VOC emissions from all kilns combined shall not exceed 651.0 tons per year (tpy) based on a rolling 12-month total.

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

- 3.6 For Emission Points AA-001a, AA-002a, and AA-003, the permittee shall limit the total throughput of dried lumber produced from all kilns combined to no more than 300.0 million board feet per year (MMBF/yr) based on a rolling 12-month total.

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

- 3.7 For Emission Points AA-001a, AA-002a, and AA-003 the permittee shall limit the final moisture content of lumber dried within each kiln to ten percent (10%) or greater based on each 30-day block average.

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

- 3.8 For Emission Points AA-001a, AA-002a, and AA-003 the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products.

For the purpose of this permit, Emission Points AA-001a, AA-002a, and AA-003 are only subject to an initial notification requirement that shall be satisfied upon completing the Certification of Construction Notice required by Condition 6.1(f).

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

- 3.9 For Emission Points AA-001b and AA-002b, except as otherwise specified, the permittee shall not cause or allow the emission of smoke into the open air from a point source that exceeds forty percent (40%) opacity subject to the exceptions provided as follows:
- (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 (i.e., ash removal) operations shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided further that the aggregate duration of such emissions during any twenty-four (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.)

- 3.10 For Emission Points AA-004, AA-005, and AA-006, the permittee shall operate the cyclones and cyclofilter at all times while the corresponding air emissions equipment is in active operation. If a cyclone or cyclofilter malfunctions or stops operating, the permittee shall cease operation of the applicable air emissions equipment until the cyclone or cyclofilter is returned to service.

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

- 3.11 For Emission Point AA-007, the permittee shall minimize the emission of fugitive Particulate Matter (PM, PM<sub>10</sub>, and PM<sub>2.5</sub> – filterable only) by complying with the following standards:

(a) For the haul roads:

- (1) Apply a pavement. For the purpose of this permit, “pavement” shall be defined as any durable surface material that can adequately sustain vehicular traffic.
- (2) Conduct routine cleaning (as needed).
- (3) Apply watering and/or a sufficient dust suppressant (as needed).

(b) For the sawmill operations:

- (1) Ensure that the structural integrity of the building and enclosures containing the debarking, sawing, and chipping processes is sustained as a total enclosure.
- (2) For the purpose of this permit, “total enclosure” shall be defined as any containment building that is completely enclosed with a floor, walls, and a roof to prevent the entrainment of filterable particulate matter into the air at one hundred percent (100%) control efficiency. The total enclosure must provide an effective barrier against fugitive dust emissions such that emissions do not freely escape through any openings into the ambient air.

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

**SECTION 4. WORK PRACTICES**

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

### SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Monitoring / Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
AA-001a AA-002a AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.2	VOCs	Develop, Implement, and Maintain an O&M Plan
		5.3	Dried Lumber Throughput VOCs	Monitor the Total Throughput and Total Emissions (Monthly and Rolling 12-Month Totals)
		5.4	Final Moisture Content	Monitor the Moisture Content of Dried Lumber Processed in the Planer Mill (Daily) Calculate the Average Moisture Content (30-Day Block Average)
AA-001b AA-002b	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.5	Date, Time, and Duration of Periods of Start-Up and Shutdown	Monitor Each Applicable Start-Up or Shutdown Period Calculate the Total Duration of All Applicable Start-Up or Shutdown Periods (Rolling 12-Month Totals)
AA-001b AA-002b	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.6	Opacity PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Conduct a VEE during Each Applicable Start-Up or Shutdown Period
AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.7	Opacity PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Conduct a Visible Emissions Observation and, as required, a VEE (Weekly)
		5.8	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Perform an Inspection on the Cyclones and Cyclofilter (Monthly)
AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.9	Differential Pressure Drop	Monitor the Pressure Drop Across the Cyclofilter (Daily)
AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.10	Opacity PM / PM <sub>10</sub> / PM <sub>2.5</sub>	Conduct a Visible Emissions Observation (Monthly)
		5.11	PM / PM <sub>10</sub> / PM <sub>2.5</sub> (filterable only)	Develop, Implement, and Maintain a BMP Plan for Haul Roads

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. Copies of such records shall be submitted to the 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 Points AA-001a, AA-002a, and AA-003, the permittee shall develop, implement, and maintain an Operation and Maintenance (O&M) Plan that details the good operating practices utilized to minimize VOC emissions from each kiln. As deemed necessary, the permittee shall revise the O&M Plan to address any changes to applicable operations and/or to incorporate additional best management practices.

The O&M Plan shall address all preventative maintenance, parametric monitoring, work practices, and manufacturer recommendations for the proper operation of the kilns. The plan shall specify the proper operating ranges and conditions, frequency of monitoring, and maintenance schedules.

Additionally, the practices to be detailed in the O&M Plan shall include, but are not limited to, visual inspections, proper wet bulb operation, entrance/exit baffle inspection, greasing of kiln cartwheels and fan shafts, hydraulic oil levels, moisture content equipment calibration, and temperature probe calibration.

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

- 5.3 For Emission Points AA-001a, AA-002a, and AA-003, the permittee shall monitor and record the total throughput of dried lumber produced by the combined kilns in thousand board feet (MBF) on both a monthly and rolling 12-month total basis.

Additionally, the permittee shall utilize the throughput data and the emission factor specified in Condition 3.5 to calculate and record the total emission of volatile organic compounds (VOCs) from the combined kilns, on both a monthly and rolling 12-month total basis.

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

- 5.4 For Emission Points AA-001a, AA-002a, and AA-003, the permittee shall monitor and record the moisture content of dried lumber processed in the planer mill record on a daily basis. This monitoring data shall be utilized to calculate 30-day block averages for demonstrating compliance with the moisture content standard in Condition 3.7.

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

- 5.5 For Emission Points AA-001b and AA-002b, the permittee shall monitor and record the date, time, and duration of each start-up and shutdown period for a burner in which emissions are diverted to the corresponding abort stack. Additionally, the permittee shall calculate and record the total duration of all applicable start-up and shut-down periods for each burner in hours per year based on rolling 12-month totals.

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

- 5.6 For Emission Points AA-001b and AA-002b, the permittee shall conduct a visible emissions evaluation (VEE) in accordance with EPA Test Method 9 on the exhaust of each abort stack during periods of start-up and shutdown in which emissions from a burner are diverted to the corresponding abort stack.

In the event that a VEE cannot be conducted during an applicable start-up or shutdown period, the permittee shall record a written explanation as to why it was not possible to conduct the VEE.

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

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

- 5.7 For Emission Points AA-004, AA-005, and AA-006, the permittee shall conduct a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each cyclone and cyclofilter during daylight hours and during representative operating conditions. Each observation period shall last for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately conduct a visible emissions evaluation (VEE) in accordance with EPA Test Method 9. In the event that a VEE is required but cannot be conducted on a denoted cyclone, the permittee shall record a written explanation as to why it was not possible to conduct the VEE.

The permittee shall maintain all documentation and information pertaining to each observation or evaluation, the nature and cause of any visible emissions, any corrective action(s) taken to prevent or minimize emissions, and the date and time when visual emission observations or evaluations were conducted.

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

- 5.8 For Emission Points AA-004, AA-005, and AA-006, the permittee shall perform and record a monthly inspection on each cyclone and cyclofilter to ensure that each unit is operating as originally designed. An inspection shall evaluate (at a minimum) the following components:

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



If any problem is noted during an inspection, the permittee shall conduct and record the necessary maintenance action(s) to ensure operation of the cyclone or cyclofilter as originally designed.

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

- 5.9 For Emission Point AA-006, the permittee shall monitor and record the differential pressure drop (in inches of water) across the cyclofilter once on a daily basis. If a monitored pressure drop is outside the manufacturer's recommended range for the cyclofilter, the permittee shall conduct and record any corrective measures taken to return the cyclofilter to the recommended pressure drop range.

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

- 5.10 For Emission Point AA-007, the permittee shall conduct and record a monthly visible emission observation in accordance with EPA Test Method 22 on the ambient air outside each enclosure during daylight hours and during representative operation conditions. Each observation shall last for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall determine the cause of the visible emissions and implement the necessary corrective actions to prevent further emissions.

The permittee shall maintain documentation pertaining to all visual observations, the nature and cause of any visible emissions, any corrective actions taken to prevent emissions, and the date and time when visual emission observations were conducted. Additionally, the permittee shall maintain all documentation that details any maintenance actions (preventative, corrective, etc.) performed on an enclosure to maintain the applicable control efficiency.

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

- 5.11 For Emission Point AA-007, the permittee shall develop, implement, and maintain a plan that details the best management control practices employed on haul roads (both paved and unpaved) to minimize fugitive particulate matter-based emissions. The Best Management Practices (BMP) Plan shall include, at the minimum, the following information:

- (a) The frequency in which each best management control practice is performed (to the extent practicable);
- (b) The frequency in which any visual inspection is conducted on haul roads; and
- (c) Any maintenance actions to be performed on haul roads with any sufficient frequency.

(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)	Semi-Annual Reporting Requirements
		6.1(c)	Certification by Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of Beginning Actual Construction Within 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 on Completion of Construction Prior to Operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification on Changes in Construction
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Notification of the initial start-up of operations
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	Submit a Semi-Annual Monitoring Report
AA-001a AA-002a AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Submit the O&M Plan
AA-007	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit the BMP Plan

### 6.1 General Reporting Requirements:

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

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

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

official consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.1.C.

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

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

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

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

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

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

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

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

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board no later than fifteen (15) days after the actual event.

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

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

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

6.2 For Emission Point AA-000 (Facility-Wide), the permittee shall notify the MDEQ in writing on the initial start-up of on-site operations no later than fifteen (15) days after the actual date.

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

6.3 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 6.1(b) that details the following information:

- (a) Any revision(s) made to the BMP Plan for the haul roads and/or the O&M Plan for the kilns;
- (b) For Emission Point AA-007, any maintenance actions performed on the applicable enclosures in order to maintain the control efficiency specified in Condition 3.11(b);
- (c) The total dried lumber throughput produced from all kilns combined in thousand board feet per year (MBF/yr), on a rolling 12-month total basis;
- (d) The total emission of VOCs from all kilns combined in tpy, on a rolling 12-month total basis;
- (e) The average moisture content of all dried lumber processed during each month;
- (f) For Emission Points AA-001b and AA-002b, the number of start-up and shutdown periods in which emissions are diverted to the corresponding abort stack;
- (g) For Emission Points AA-001b and AA-002b, the total duration of all start-up and shutdown periods in which emissions are diverted to the corresponding abort stack based on a rolling 12-month total;
- (h) Any occurrence when a visible emissions evaluation (VEE) was necessary but not conducted and an explanation as to why it was not performed;
- (i) Any occurrence when the result of a VEE indicates non-compliance with the applicable opacity limit and the determined cause(s) of the exceedance;
- (j) Any corrective action(s) taken to minimize emissions as a result of an exceedance; and
- (k) Any maintenance action(s) performed on a cyclone or cyclofilter as well as any periods of time in which a cyclone or cyclofilter is non-operational due to malfunction.

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

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- 6.4 For Emission Points AA-001a, AA-002a, and AA-003, the permittee shall submit the initial Operation and Maintenance (O&M) Plan required by Condition 5.2 to the MDEQ for review no later than sixty (60) days after the initial start-up of all kilns.

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

- 6.5 For Emission Point AA-007, the permittee shall submit the initial Best Management Practices (BMP) Plan required by Condition 5.11 to the MDEQ for review no later than sixty (60) days after certifying the completion of construction.

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