

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Shuqualak Lumber Company Inc, Planer Mill Division
402 Oak Street
Shuqualak, Mississippi
Noxubee County

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 Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and 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.

Permit Issued: MAR 07 2012

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: February 28, 2017

Permit No.: 2000-00013

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

**APPENDIX B 40 CFR 63 SUBPART DDDD, NATIONAL EMISSION STANDARDS
FOR HAZARDOUS AIR POLLUTANTS: PLYWOOD AND
COMPOSITE WOOD PRODUCTS.**

SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 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. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. 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.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 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.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual

emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality 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 Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)

1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny 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 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 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 Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

1.20 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: APC-S-6, Section IV.D.4.)

- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions

specified in (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)

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

- (a) Upsets (as defined by APC-S-1, Section 2.37)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements

of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee 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.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.34 & 2.29)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process

equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
 - (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-101	41.9 MMBTU/HR Wood-waste boiler with cyclone for control of Particulate Matter.
AA-102	15 MMBTU/HR Wood-waste boiler with cyclone for control of Particulate Matter.
AA-104	Lumber Dry Kiln B.
AA-105	Lumber Dry Kiln C
AA-106	Lumber Dry Kiln D
AA-107	28.7 MMBTU/HR Wood-waste boiler with multiclone for control of Particulate Matter.
AA-108	28.7 MMBTU/HR Wood-waste boiler with multiclone for control of Particulate Matter.
AA-109	Lumber Dry Kiln E
AA-110	Lumber Dry Kiln F
AA-200	Yates American Planer Mill, equipped with 4 cyclones (Ref: Cyclones E, F, G, and H) for the control of particulate matter emissions.
AA-201	Planer Mill Cyclone E for the transfer of solid materials from Emission Point AA-200
AA-202	Planer Mill Cyclone F for the transfer of solid materials from Emission Point AA-200
AA-203	Planer Mill Cyclone G for the transfer of solid materials from Emission Point AA-200
AA-204	Planer Mill Cyclone H for the transfer of solid materials from Emission Point AA-200
AA-205	Lumber Planer Mill equipped with one cyclone (Ref: Cyclone I) for the transfer of solid materials
AA-301	All Group 1 Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent 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 hour. (Ref.: APC-S-1, Section 3.1)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-101	Federally enforceable Construction Permit issued May 23, 1989 and modified upon issuance of this permit.	3.B.1 3.B.6	PM	16.5 lb/hr, 72.27 TPY
	APC-S-1 Section 4.1(a)	3.B.5	SO ₂	4.8 lbs per MMBTU heat input
	APC-S-1, Section 3.4 (b)	3.B.2 3.B.6	PM	0.30 grains per dry standard cubic foot
AA-102	Federally enforceable Construction Permit issued May 23, 1989 and modified upon issuance of this permit.	3.B.1 3.B.6	PM	7.20 lb/hr, 31.54 TPY
	APC-S-1 Section 4.1(a)	3.B.5	SO ₂	4.8 lbs per MMBTU heat input

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	APC-S-1, Section 3.4 (b)	3.B.2 3.B.6	PM	0.30 grains per dry standard cubic foot
AA-200 AA-201 AA-202 AA-203 AA-204 AA-205	Federally enforceable Construction Permit issued September 10, 1996 and modified upon issuance of this permit.	3.B.3 3.B.4	PM	$E=4.1p^{0.67}$
AA-104 AA-105 AA-106 AA-109 AA-110	Federally enforceable Construction Permit issued July 24, 2001 and modified upon issuance of this permit.	3.B.8	Total maximum lumber throughput	131,400,000 board-feet per year
AA-107	Federally enforceable Construction Permit issued September 10, 1996 & modified November 20, 1997	3.B.3 3.B.6	Fuel usage	Woodwaste only
	APC-S-1 Section 3.4(b)	3.B.2	PM	0.30 grains per dry standard cubic foot 19.00 lb/hr, 83.22 TPY
	APC-S-1 Section 4.1(a)	3.B.5	SO ₂	4.8 lbs per MMBTU heat input
	NSPS, Subpart A & Subpart Dc, 40 CFR 60.40c, Standards of Performance for Small Industrial - Commercial-Institutional Steam Generating Units.	3.B.7	PM	See 3.B.7
AA-108	APC-S-1 Section 3.4(b)	3.B.2	PM	0.30 grains per dry standard cubic foot
	APC-S-1 Section 4.1(a)	3.B.5	SO ₂	4.8 lbs per MMBTU heat input
	NSPS, Subpart A & Subpart Dc, 40 CFR 60.40c, Standards of Performance for Small Industrial - Commercial-Institutional Steam Generating Units.	3.B.7	PM	See 3.B.7
	Title V Permit Modified March 5, 2004 and upon permit issuance	3.B.6	Fuel usage	Woodwaste only
		3.B.2	PM	24.9 tons/year

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-108	Title V Permit Modified March 5, 2004 and upon permit issuance	3.B.2	PM ₁₀	14.9 tons/year
AA-104 AA-105 AA-106 AA-109 AA-110 AA-301	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD	3.B.9	Applicability	40 CFR 63.2231
AA-101 AA-102 AA-107 AA-108 AA-201 AA-202 AA-203 AA-204 AA-205	APC-S-1 Section 3.1(a)(b)(c)	3.A.1 1.19	Opacity	40%

- 3.B.1 The permittee shall comply with the limits established in their Federally Enforceable Construction Permit issued on May 23, 1989 and modified upon issuance of this permit. (Ref: Title V Permit to Operate issued on May 17, 2002 and upon permit issuance.)
- 3.B.2 For Emission Point AA-101, AA-102, AA-107, AA-108, fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, or spent wood, or water treatment by-products sludge, may be allowed emission rates up to 0.3 grains per dry standard cubic foot. (Ref: APC-S-1 Section 3.4 (b))
- 3.B.3 The permittee shall comply with the limits established in their Federally Enforceable Construction Permit issued on September 10, 1996 & modified November 20, 1997 and modified upon issuance of this permit. (Ref: Title V Permit to Operate issued on May 17, 2002 and upon permit issuance.)
- 3.B.4 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the 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: APC-S-1, Section 3.6(a))

3.B.5 For Emission Points AA-101, AA-102, AA-107 and AA-108, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured sulfur dioxide) per million BTU heat input. (Ref: APC-S-1, Section 4.1(a))

3.B.6 The permittee shall use

1. Uncontaminated woodwaste such as that derived from Shuqualak Lumber Company Inc., Sawmill Division and/or permittee's planer mill

OR

2. Woodwaste such as that derived from Phenol Formaldehyde bonded plywood containing 0.532% HAP VOC as fuel for emission points AA-101, AA-102, AA-107 and AA-108.

(Ref.: Title V Permit Modified March 5, 2004 and upon permit issuance)

3.B.7 Emission points AA-107 and AA-108 are subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units as specified in 40 CFR 60, Subpart Dc, and the General Provisions as specified in 40 CFR 60, Subpart A, and the permittee must comply with all applicable requirements of said standards.

3.B.8 For Emission Points AA-104, AA-105, AA-106, AA-109, and AA-110, the permittee shall not exceed a combined lumber throughput of 131,400,000 board feet per year in any consecutive 365-day period. (Ref: Title V Permit issued on May 17, 2002 and upon issuance of this permit.)

3.B.9 Emission Points AA-301, AA-104, AA-105, AA-106, AA-109, and AA-110 are subject to the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD. These emission points, excluding AA-301, are affected sources per Section 63.2231(a) of the rule; however, the only applicable requirement for these emission points was the initial notification. There are no other applicable monitoring, recordkeeping or reporting requirements for these emission points in Subpart DDDD. There are work practice standards in Section 3.D for Emission Point AA-301. (Ref: 40 CFR 63.2231 and 40 CFR 63.2232)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1	PM	0.6 lbs/MMBTU
APC-S-1, Section 4.1(a)	3.C.2	SO ₂	4.8 lbs/MMBTU
APC-S-1, Section 3.6(a)	3.C.3	PM/PM ₁₀	$E = 4.1 * p^{0.67}$

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.
- 3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the 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: APC-S-1, Section 3.6 (a))

D. Work Practice Standards

- 3.D.1 For Emission Point AA-301, the permittee shall only use non-HAP containing coatings in all Group 1 Miscellaneous Coating operations. (Ref.: 40 CFR 63.2241 and Table 3 of Subpart DDDD)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a., c.,&d.)
- 4.3 Emission Point(s) AA-101, AA-102, AA-107, and AA-108 are subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD by the compliance date established in the final rule.

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 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 APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))
- 5.A.5 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 actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section

III.A.3.c.(2))

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-107 and AA-108	Boiler Fuel Usage	The permittee shall record and maintain records of the amounts of each fuel combusted during each day.	5.B.1	40 CFR 60.48c(g)
	Recordkeeping Requirement	All records required under NSPS Subpart Dc shall be maintained by the permittee for a period of two years following the date of such record.	5.B.1	40 CFR 60.48c(i)
AA-101, AA-102, AA-107, and AA-108	Opacity	The permittee shall perform weekly three EPA Reference Method 9 tests of emissions from exhaust stacks. All tests shall be performed in the same observation period. If the first EPA Reference Method 9 test indicates visible emissions are less than 20%, the last two tests can be skipped.	5.B.5	APC-S-6, Section III.A.3
AA-101, AA-102, AA-107, and AA-108	PM	The permittee shall monitor PM emissions by stack testing in accordance with EPA reference Methods 1-5, respectively, or approved equivalent methods, by November 1, 2012, and biennially thereafter.	5.B.2	APC-S-6, Section III.A.3
AA-104, AA-105, AA-106, AA-109, and AA-110	Lumber Production	The permittee shall record the amount of lumber dried in each dry kiln per day and total combined throughput expressed as BF/year on both a daily basis and a 365-day consecutive total.	5.B.3	Title V Permit issued on May 17, 2002 and upon issuance of this permit.
AA-200, AA-201, AA-202, AA-203, AA-204, and AA-205	Opacity	The permittee shall perform weekly observations of emissions from exhaust stacks. If any visible emissions are detected, EPA Reference Method 9 shall be performed.	5.B.4	APC-S-6, Section III.A.3
AA-200, AA-201, AA-202, AA-203, AA-204,	Weekly inspections	The permittee shall perform weekly inspections of the air pollution control equipment. Maintenance shall be performed as necessary. Records shall be maintained on site.	5.B.6	Mississippi Air Regulation APC-S-6, Section III.A.3.a

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
and AA-205				
AA-108	Boiler Fuel Usage	The permittee shall record and maintain records of the total equivalent heat input of each fuel combusted during each day.	5.B.7	APC-S-6, Section III.A.3

5.B.1 Emission Points AA-107 and AA-108 are subject to and shall comply with the New Source Performance Standards (NSPS), as described in 40 CFR 60, Subpart A - General Provisions, including Notification and Recordkeeping as provided in 40 CFR 60.7 and the specific requirements outlined in 40 CFR 60.40c, Subpart Dc - Standards of Performance for Small Industrial - Commercial-Institutional Steam Generating Units.

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. (Ref.: 40 CFR 60.48c(g), Subpart Dc)

All records required shall be maintained by the owner or operator of the affected facility for a period of two years.(Ref.: 40 CFR 60.48c(i), Subpart Dc).

5.B.2 For Emission Points AA-101, AA-102, AA-107, and AA-108, the permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5. The permittee shall demonstrate compliance and submit the stack test report by November 1, 2012, and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the sources within 80% of their rated capacity.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

For Emission Point AA-108, the permittee shall use the results of the stack tests to limit the total heat input of the emission point to demonstrate compliance with the PM and PM₁₀ limitations identified in Section 3 of this permit. (Ref.: APC-S-6, Section III.A.3)

- 5.B.3 For Emission Points AA-104, AA-105, AA-106, AA-109, and AA-110, the permittee shall record the amount of lumber dried in each dry kiln per day and total combined throughput expressed as BF/year on both a daily basis and a 365-day consecutive total. (Ref: Title V Permit issued on May 17, 2002, and upon issuance of this permit.)
- 5.B.4 For Emission Points AA-200, AA-201, AA-202, AA-203, AA-204, and AA-205, the permittee shall assure compliance with the opacity limitations by weekly observations of emissions from exhaust stacks. If any visible emissions are detected, EPA Reference Method 9 shall be performed. If conditions are such that opacity readings cannot be taken using observations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. Visible emission observations shall be performed by a person who is certified as a visible emission reader by MDEQ or an equivalent agency qualified for such services. The permittee shall submit a summary report of the required monitoring in accordance with Section 5.A.4 of this document. (Ref: APC-S-6, Section III.A.3)
- 5.B.5 For Emission Points AA-101, AA-102, AA-107, and AA-108, the permittee shall assure compliance with the opacity limitations by conducting 3 (three) Visible Emission Evaluations (VEE) consistent with EPA Reference Method 9 procedures on a weekly basis. These three VEE's shall be performed by a certified observer and conducted during daylight hours and during the same 1 hour period. If a visible emissions evaluation is observed and recorded at an average of 20% or less opacity during the first of three evaluations, the permittee may discontinue the test without conducting the two additional evaluations. If any of the three Method 9 tests performed exceed 40% opacity, the facility shall be considered out of compliance.

If conditions are such that opacity readings cannot be taken using evaluation procedures consistent with that of EPA Reference Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. Visible emission observations shall be performed by a person who is certified as a visible emission reader by MDEQ or an equivalent agency qualified for such services. The permittee shall maintain a summary report in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summary report of the required monitoring in accordance with Condition 5.A.4 of this document. (Ref: APC-S-6, Section III.A.3)

- 5.B.6 For Emission Points AA-200 through AA-205, the permittee shall perform weekly inspections of the cyclones. Maintenance shall be performed as necessary to maintain proper operation of the cyclones. Records of weekly inspections and any maintenance work shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. The permittee shall maintain these records for at least five (5) years following the date of such record.

The permittee shall maintain on hand at all times sufficient equipment necessary to repair and/or overhaul the cyclones. In the event of a failure of the cyclones, the permittee shall cease operations until such time as repairs are made and the cyclones are restored to the proper working order and functioning at a proper efficiency. (Ref.:APC-S-6, Section III.A.3)

- 5.B.7 For Emission Point AA-108, the permittee shall record and maintain records of the total equivalent heat input of each fuel combusted during each day. (Ref: APC-S-6, Section III.A.3)

C. Specific Reporting Requirements

- 5.C.1 The permittee shall submit to the Office of Pollution Control a semi-annual report, in accordance with APC-S-6, Section III.A.3.c(1) and Condition 5.A.4 of this permit. This report shall include:

- For Emission Points AA-104, AA-105, AA-106, AA-109, and AA-110, the total amount of lumber dried in each kiln per day and total combined throughput, expressed as BF/Year, on both daily basis and 365-day consecutive total.
- For Emission Points AA-200, AA-201, AA-203, AA-204, and AA-205, a summary report of the weekly visible emission observations performed during the monitored period.
- For Emission Points AA-101, AA-102, AA-107, and AA-108, a summary report of the weekly visible emission observations performed during the monitored period.
- For Emission Point AA-108, the daily total heat input of each type of fuel consumed on a 365-day consecutive basis.
- For Emission Point AA-108, the total PM and PM₁₀ emissions in tons/year on a 365-day consecutive basis.

(Ref: Title V permit issued May 17, 2002 and modified upon issuance date)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations,

persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 Fm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

40 CFR 63, SUBPART DDDD

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS:
PLYWOOD AND COMPOSITE WOOD PRODUCTS**