

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

PERMIT

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

THIS CERTIFIES THAT

General Binding Corporation
300 Quartet Avenue
Booneville, Mississippi
Prentiss 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 the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued:

Modified:

Expires:

Permit No.: 2340-00004

Section 1.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.1.D [11 Miss. Admin.Code Pt. 2, R. 2.1.D.]
3. Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
4. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin. Code Pt. 2, R.2.2.B(5).]
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
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).)
8. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).]
9. 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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee

may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)
11. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:
 - a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and
 - b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission.(Ref.: Miss. Code Ann. 49-17-21)
12. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
 - a. Persistent violation of any terms or conditions of this permit.
 - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 - c. A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission [11 Miss. Admin. Code Pt. 2, R. 2.2.C.]
13. Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]
14. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).]
15. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]

16. 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. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
17. The permittee shall furnish to MDEQ within a reasonable time any information 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 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 MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]
18. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined and "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
 - a. routine maintenance, repair, and replacement;
 - b. use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - c. use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - d. use of an alternative fuel or raw material by a stationary source which:
 - (a) 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
 - (b) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40CFR 51.66;
 - 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.”

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

B. GENERAL OPERATIONAL CONDITIONS

1. 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, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (11 Miss. Admin. Code Pt. 2, R.2.10.)
2. 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) working days of the time the deviation began. [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]
3. The permittee shall retain all required records, monitoring data, supported information and reports 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 or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]
4. The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants." (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
5. Compliance Testing: Regarding compliance testing:
 - (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
 - (b) Compliance testing will be performed at the expense of the permittee.
 - (c) Each emission sampling and analysis report shall include but not be limited to the following:

- (1) detailed description of testing procedures;
- (2) sample calculation(s);
- (3) results; and
- (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

C. GENERAL SUBMITTAL REQUIREMENTS

6. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.8.]
7. Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin. Code Pt. 2, R.2.2.B(11).]

SECTION 2
EMISSION POINT DESCRIPTION

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

Emission Point	Description
AA-001	72 natural gas fired space heaters with a total heat input of 27.49 MMBtu/hr
AA-002	Emissions from baghouse that control PM emissions from 3 Holzma saws used to cut wood panels
AA-005	Emissions from drying operation from electric oven from screen printing operation (applies the General Binding logo and border on a small lap board)
AA-006	Emissions from 2 electric bake ovens for drying in the process of applying a water-based acrylic polyurethane coating from Dow

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.F	3.1	PM/PM ₁₀	$E = 4.1 p^{0.67}$
AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	3.2	PM	Operational
AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3.B	3.4	Opacity	Not to exceed 40%

- 3.1 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (filterable only) 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: 11 Miss. Admin. Code Pt. 2, R. 1.3.F)

- 3.2 For Emission Points AA-002, the baghouse shall be operating as designed when any of the three Holmza saws are in operation. (Ref: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)). 1.3.D(1)(a).)
- 3.4 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-002	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2)	5.1	PM	Monthly inspections of the air pollution control equipment.
AA-002	11 Miss. Admin. Code Pt.2, R 6.3.A.(3)(a)(2)	5.2	VOCs, HAPs	Monthly Monitoring and Recordkeeping

- 5.1 For Emission Points AA-002, the permittee shall perform monthly inspections of the air pollution control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. In the event of a failure of the air pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the air pollution control equipment is restored. The permittee shall maintain on-site sufficient equipment necessary to repair/replace any pollution control equipment. Records of monthly 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.2 For the entire facility, the permittee shall monitor and record the Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), and total HAPs emitted monthly. The emissions shall be recorded monthly in tons/month and a rolling 12-month total in tons/yr 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-002	11 Miss. Admin. Code Pt.2, R 6.3.A.(3)(a)(2)	6.1	Annual submission of VOCs, HAPs and Total HAP emissions

- 6.1 For the entire facility, the permittee shall submit an annual report for the past calendar year by January 31, that list the monthly totals and the 12– month rolling total for each month for VOCs, HAPs and Total HAPs emissions. (Ref.11 Miss. Admin. Code Pt.2, R 6.3.A.(3)(a)(2))