

STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Norbord Industries LLC
1194 Highway 145
Guntown, Mississippi
Lee County

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.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: October 21, 1993

Permit No.: 1540-00058

Modified: December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001,

June 3, 2003, February 20, 2008, December 10, 2012 and _____

Draft/Proposed

SECTION 1

A. 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 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).)

- 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.)
- 1.11 **Solids Removal:** 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)
- 1.12 **Diversion and Bypass of Air Pollution Controls:** 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.)
- 1.13 **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).)
- 1.14 **Right of Entry:** The permittee shall allow the Mississippi Department of Environmental Quality 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 Mississippi Department of Environmental Quality, 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 or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
- 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:** Except as prohibited in Section 1, Condition 24 of this permit, 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 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 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.22 **Application for a Permit to Operate:** Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V 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:** Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for

issuance or modification of a State Permit to Operate or a Title V 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 Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
- 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 Deviation Reporting: 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 1.27 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).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
2. The permittee must notify DEQ 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).)
3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)
4. 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).)

**SECTION 2
EMISSION POINT DESCRIPTION**

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-001	Wafer drying system consisting of: <ul style="list-style-type: none"> • three (3) parallel conveyor dryers that use hot thermal oil; each conveyor dryer has three (3) drying zones (Zones 1 to 3) • three (3) wood-fired Wellons burners (each with a heat input of 88.84 MMBTU/hr for a total of 266.52 MMBTU/hr) used to heat the thermal oil; the oxidizers combust exhaust from Zone 2 of the dryers • cyclones, and an electrostatic precipitator (ESP) for PM emissions control from Zone 3 of the dryers.
AA-002	Board press vent equipped with a biofilter for control of VOCs.
AA-003	Side trim and flying cut off saw equipped with a cyclone which then exhausts to a Baghouse (Facility Reference No. By) for PM emissions control.
AA-004	Blending and mat forming equipped with a Baghouse (Facility Reference No. Bx) for PM emissions control.
AA-005	Sawline equipped with a cyclone which then exhausts to a Baghouse (Facility Reference No. C) for PM emissions control.
AA-006	Sander equipped with a Baghouse (Facility Reference No. D) for PM emissions control.
AA-007	High pressure relay system equipped with 2 Cyclones (Facility Reference Nos. A and F) which then exhausts to a Baghouse (A) for PM emissions control.
AA-008	Log debarking process.
AA-009	Fugitive emissions from on-site vehicle traffic.
AA-014	Waferizer and dryer area equipped with a Baghouse (Facility Reference No. B) for PM emissions control.
AA-015	SuperScreen with a Baghouse
AA-016	Cummins Fire Pump Engine (200 hp)
AA-017	Caterpillar Emergency Generator (318 hp)
AA-018	Regenerative Thermal Oxidizer (RTO) for VOC and PM control from Zone 1 of conveyor dryer 1
AA-019	Regenerative Thermal Oxidizer (RTO) for VOC and PM control from Zone 1 of conveyor dryer 2
AA-020	Regenerative Thermal Oxidizer (RTO) for VOC and PM control from Zone 1 of conveyor dryer 3

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Entire Facility	40 CFR Part 63 - Subpart DDDD National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products (40 CFR 63.2231 and 63.2290)	3.1	HAP	General Applicability
	40 CFR Part 60 - Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and applicable parts of 40 CFR Part 60, Subpart A- General Provisions. (40 CFR 60.40c)	3.2	PM, Opacity	General Applicability
	40 CFR Part 63, Subpart ZZZZ- National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Table 2d, Subpart ZZZZ (40 CFR 63.6603)	3.3	HAP	Operating/Maintenance Requirements
	11 Miss. Admin. Code Pt. 2, R.1.3.F(1)	3.4	PM	E=4.1*(p) ^{0.67} , or as otherwise limited herein.
AA-001	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008 and modified herein.	3.6	PM/PM ₁₀	19.0 lb/ hr and 83.2 TPY
			NO _x	0.25 lbs/ MMBTU, not to exceed 66.8 lbs/hr and 292.4 TPY
			VOC	0.12 lbs/MMBTU, not to exceed 30.7 lbs/hr and 134.5 TPY
	40 CFR 60.43c, Subpart Dc	3.7	PM/PM ₁₀	0.10 lbs/ MMBTU
	11 Miss. Admin. Code Pt. 2, R.1.3.D(2)	3.8	PM/PM ₁₀	0.3 grains/dry standard cubic foot
	40 CFR 60.43c(c), Subpart Dc	3.9	Opacity	20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.
	11 Miss. Admin. Code Pt. 2, R.1.4.A(1)	3.10	SO ₂	4.8 lbs/MMBTU
AA-002	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008 and December 10, 2012	3.6	PM/PM ₁₀	8.3 lb/hr and 36.4 TPY.
			VOC	41.9 lb/hr and 183.6 TPY.
			Opacity	40%

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-003	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.6	PM/PM ₁₀	4.6 lb/hr and 20.1 TPY.
			VOC	3.9 lb/hr and 17.1 TPY.
			Opacity	40%
AA-004	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.6	PM/PM ₁₀	2.2 lb/hr and 9.6 TPY.
			VOC	3.3 lb/hr and 14.5 TPY.
			Opacity	40%
AA-005	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.6	PM/PM ₁₀	2.2 lb/hr and 9.6 TPY.
			VOC	1.6 lb/hr and 7.0 TPY.
			Opacity	40%
AA-006	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.6	PM/PM ₁₀	1.8 lb/hr and 7.9 TPY.
			VOC	1.4 lb/hr and 6.1 TPY.
			Opacity	40%
AA-007	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.6	PM/PM ₁₀	4.6 lb/hr and 20.1 TPY.
			VOC	4.8 lb/hr and 21.0 TPY.
			Opacity	40%
AA-014	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and December 10, 2012.	3.6	PM/PM ₁₀	4.6 lb/hr and 20.1 TPY.
			VOC	13.1 lb/hr and 57.4 TPY.
			Opacity	40%
AA-018	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and December 10, 2012 and modified herein	3.6	PM/PM ₁₀	1.8 lb/hr and 7.9 TPY.
			VOC	3.0 lb/hr and 13.1 TPY.
			Opacity	40%
AA-019	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and December 10, 2012 and modified herein	3.6	PM/PM ₁₀	1.8 lb/hr and 7.9 TPY.
			VOC	3.0 lb/hr and 13.1 TPY.
			Opacity	40%

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-020	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and December 10, 2012 and modified herein	3.6	PM/PM ₁₀	1.8 lb/hr and 7.9 TPY.
			VOC	3.0 lb/hr and 13.1 TPY.
			Opacity	40%
AA-018 AA-019 AA-020	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)	3.5		Authorization to construct The exhaust from Zone 1 of the conveyor dryers shall be captured by the Regenerative Thermal Oxidizers or Wellons burners
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.10	SO ₂	4.8 lbs./MMBTU

- 3.1 For the entire facility, the permittee is subject to and shall comply with all applicable requirements and limitations of 40 CFR Part 63 Subpart DDDD - National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products and with associated applicable provisions of 40 CFR Part 63 Subpart A – General Provisions. (Ref.: 40 CFR 63.2231 and 63.2290)
- 3.2 For the entire facility, the permittee is subject to and shall comply with all applicable requirements and limitations of 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and with the associated applicable provisions of 40 CFR Part 60 Subpart A – General Provisions. (Ref.: 40 CFR 60.40c)
- 3.3 For the entire facility, the permittee is subject to and shall comply with all applicable requirements and limitations of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). (Ref.: 40 CFR 63.6603)
- 3.4 Except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of 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.)
- 3.5 Beginning upon permit issuance date, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from:

- AA-018 Regenerative Thermal Oxidizer (RTO) for conveyor dryer 1**
- AA-019 Regenerative Thermal Oxidizer (RTO) for conveyor dryer 2**
- AA-020 Regenerative Thermal Oxidizer (RTO) for conveyor dryer 3**

The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified herein.

The permittee shall capture the exhaust gases from Zone 1 of the conveyor dryers and route them directly into the flame zones of the combustion units: The Regenerative Thermal Oxidizers (AA-018, AA-019, AA-020) or the Wellons burners (AA-001). Such air emissions 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))

- 3.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-014, AA-018, AA-019 and AA-020, the permittee is limited by the federally enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, December 21, 2012 and herein.
- 3.7 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere any gases that contain PM in the excess of 0.10 lb/MMBTU (43 ng/J) heat input. (Ref.: 40 CFR 60.43c(b), Subpart Dc)
- 3.8 For Emission Point AA-001, the permittee shall be allowed emission rates up to 0.30 grains/dry standard cubic foot. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.D(2))
- 3.9 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity. The opacity standards under this section apply at all times except during periods of startup, shutdown or malfunction. (Ref.: 40 CFR 60.43c (c) and (d), Subpart Dc)
- 3.10 For Emission Points AA-001, AA-018, AA-019 and AA-020, the maximum discharge of sulfur oxides (SO₂) from any fuel burning installation in which the fuel is burned to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))

**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	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)	5.1	PM/PM ₁₀ , NO _x , VOC	Stack Test Biennially
AA-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)	5.2	PM/PM ₁₀ , VOC	Stack Test Biennially
AA-003, AA-004, AA-005, AA-006, AA-007, AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)	5.3	PM/ PM ₁₀	Stack Test once within the life of the permit
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)	5.4	VOC	Stack Test Biennially
Entire Facility	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)	5.5	Control Equipment	Conduct weekly inspections and record any repair or maintenance done
AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-014, AA-015, AA-018, AA-019, AA-020	11 Miss. Admin. Code Pt. 2, R.6.3.A(3)(a)(2)	5.6	Opacity	Conduct weekly (or more often if needed) inspection for Visible Emissions. If any are observed, an EPA reference method 9 test is to be performed
AA-018, AA-019, AA-020	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)	5.7	PM/PM ₁₀ , VOC	Stack Test Biennially

- 5.1 For Emission Point AA-001, the permittee shall demonstrate compliance with the particulate matter, nitrogen oxide, and volatile organic compound emission limitations by stack testing biennially (every two years) in accordance with EPA Reference Methods 1-5, 7, and 25 or 25A, respectively, and by submittal of a stack test report by December 1, 2012, and biennially thereafter. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a))
- 5.2 For Emission Point AA-002, the permittee shall demonstrate compliance with the volatile organic compound emission limitation by stack testing biennially (every two years) in accordance with EPA Reference Method 25 or 25A, and submittal of a stack test report beginning December 1, 2012, and biennially thereafter. The permittee shall also demonstrate compliance with the particulate matter emission limitation by stack testing in accordance with EPA Reference Methods 1-5, and submittal of a stack test report no later

- than December 1, 2012. During compliance demonstration, the permittee shall operate at or near the maximum press loading rate, maximum safe press temperature, and shall use resins with the highest VOC content expected. Once compliance has been demonstrated for AA-002, the permittee shall not exceed the operating levels, for the parameters listed above, that Emission Point AA-002 was tested at. If increases in VOC resin content are needed, the permittee shall demonstrate compliance using the higher VOC content resin within 30 days of beginning its use. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a))
- 5.3 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with the Particulate Matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5 and submittal of a stack test report once within the 5-year term of this permit, no later than December 1, 2014. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a))
- 5.4 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with the VOC emission limitations by stack testing biennially (every two years) in accordance with EPA Reference Methods 25 or 25A, and submittal of a stack test report beginning December 1, 2012, and biennially thereafter. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a))
- 5.5 For the Entire Facility, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. Records of these inspections and maintenance shall be kept in log form and made available for review upon request, and a summary report shall be submitted in accordance with the semi-annual reporting requirements. In addition, the permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored, except when approved by the Mississippi Environmental Quality Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a))
- 5.6 For all emission points except Emission Point AA-001, the facility must conduct weekly inspections for visible emissions. If any visible emissions are detected (one-minute interval) in excess of the applicable opacity standard, with the exception of steam plumes, conduct a minimum of one six-minute observation in accordance with EPA Reference Method 9. Upon observation of visible emissions in excess of the applicable opacity standard, from an emission point, the frequency of observation for that emission point shall become daily until no visible emissions in excess of the applicable opacity standard are observed for seven consecutive days. After seven consecutive days of no visible emission observations, the inspection frequency may be reduced to weekly. If no visible emissions are observed after three consecutive months of weekly observations, the frequency may be reduced to monthly. However, if emissions are observed during a monthly inspection, the frequency of inspection shall revert to the daily schedule as specified above. The permittee

shall maintain records of all applicable opacity inspections and any VEE's that are performed for a period of five (5) years. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 6. R.6.3.A(3)(a)(2))

- 5.7 For Emission Points AA-018, AA-019 and AA-020, the permittee shall demonstrate compliance with particulate matter (PM), PM10, volatile organic compound (VOC) and Opacity emission limitations by performing a stack test in accordance with EPA Reference Methods 1-5, Method 201 or 201A, in conjunction with Reference Method 202, 40 CFR 51, Appendix M, Method 9, and Method 25 or 25A, within 270 days after startup of the modified source and biennially (every two years) thereafter. During stack testing, permittee shall monitor parameters that will correlate to the emission point compliance with the applicable limitations.

The permittee shall submit said test report within 60 days of performance of the test. For the purpose of compliance demonstration, the permittee shall operate at or near the maximum dryer loading rate.

If the permittee plans to use a test method, procedure, or operating condition that differs from the requirements of this permit herein, then a pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the DEQ. Also, the DEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref.: Federally Enforceable Permit to Construct issued on October 21, 1993, modified herein; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))

**SECTION 6
REPORTING REQUIREMENTS**

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-014, AA-018, AA-019, AA-020	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)	6.1	Pretest notifications and stack test report requirements

6.1 For Emission Point AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-014, AA-018, AA-019 and AA-020, the permittee shall submit the following notifications, information, and reports for each required performance test on or before the dates specified in Section 5:

- (a) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so an observer may be afforded the opportunity to witness the test(s).
- (b) For all required testing, 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 MDEQ. If the test protocol contains variances from the EPA Reference Methods, the permittee shall submit a written test protocol at least ninety (90) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol, the permittee may request that the submittal of a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
- (c) The permittee shall submit the results of all required emissions testing in the units specified by the limitations set forth in Section 3. Note, for VOC emissions testing conducted in accordance with EPA Reference Methods 25 or 25A, the permittee shall report the results on an “as carbon” basis.
- (d) The permittee shall submit a summary of the results of any periodic and/or parametric monitoring during performance testing.

The performance test results must be submitted to MDEQ within sixty (60) days following completion of the performance test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3))