

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Hood Industries Inc, Waynesboro  
915 Industrial Park Road  
Waynesboro, Mississippi  
Wayne 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:**

**Effective Date:** As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

---

**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: May 31, 2023**

**Permit No.: 2840-00004**

7876 PER20130001

**Draft/Proposed**

## **TABLE OF CONTENTS**

SECTION 1. GENERAL CONDITIONS.....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES .....	13
SECTION 3. EMISSION LIMITATIONS & STANDARDS .....	14
SECTION 4. COMPLIANCE SCHEDULE .....	25
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS .....	26
SECTION 6. ALTERNATIVE OPERATING SCENARIOS .....	37
SECTION 7. TITLE VI REQUIREMENTS.....	38

### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

## 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
  - (a) This permit shall be reopened and revised under any of the following circumstances:
    - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
    - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
    - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
    - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 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 11 Miss. Admin. Code Pt. 2, Ch. 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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 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.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.16 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.18 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 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 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 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

7876 PER20130001

Draft/Proposed
----------------

approval to conduct burning is secured from the proper airport authority, owner or operator.

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

- 1.24 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.

7876 PER20130001

Draft/Proposed
----------------

- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.

7876 PER20130001

Draft/Proposed
----------------

- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 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 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities. (Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Woodwaste Boiler (rated at 100 MMBTU/hr) with a Multi-cyclone (not for pollution control)
AA-007	Planer Mill equipped with Cyclone
AA-008	Hog/Trimmer equipped with Cyclone; Controls emissions from AA-015
AA-009	Solid Fuel Silo for AA-013 equipped with Cyclone
AA-011	Steam-heated Lumber Kiln
AA-013	Direct-Fired Batch Lumber Dry Kiln
AA-014	Direct-Fired Continuous Lumber Dry Kiln
AA-015	Solid Fuel Silo for AA-014 equipped with Cyclone; Emissions are routed to AA-008
AA-016	Surge Bin for AA-014 equipped with Cyclone
AA-017	Emergency Generator with Diesel Fired Compression Ignition Emergency Stationary Internal Combustion 4-stroke Engine (130 hp/97 kW)

7876 PER20130001

Draft/Proposed

## 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7485, 63.7490, 63.7495(b), 63.7499(h) and (l))	3.B.1	HAPs	General Applicability
	40 CFR 63.7510(a) and Table 2, Subpart DDDDD	3.B.2	Filterable PM	0.44 lb/MMBTU of heat input or 0.55 lb/MMBTU of steam output
			CO	3,500 ppm by volume on a dry basis corrected to 3 % oxygen, 3-run average or 3.5 lb/MMBTU of steam output
			Hg	0.000057 lb/MMBTU of heat input or 0.000064 lb/MMBTU of steam output
			HCl	0.022 lb/MMBTU of heat input or 0.025 lb/MMBTU of steam output
		3.B.3	Operating Limits	a) Operating load not to exceed 110 percent of the highest hourly average operating load recorded during qualifying test runs  b) Operate the oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during a qualifying CO performance test
	11 Miss. Admin. Code Pt. 2, R.1.3.D(2)	3.B.4 and 3.B.5	PM	0.30 grains per dry standard cubic foot
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.6	SO <sub>2</sub>	4.8 lbs/MMBTU
	Federally enforceable limit established in Permit to Construct issued June 21, 2016, modified herein	3.B.7	Steam Production	257,400,000 lbs of steam per year, on a 12-month rolling basis.
AA-011 AA-013 AA-014	Federally enforceable limit established in Permit to Construct issued June 21, 2016 and modified herein	3.B.8	Kiln-dried lumber production	AA-011: 66,000 MBF/year AA-013: 61,440 MBF/year AA-014: 87,560 MBF/year on a 12-month rolling basis.
AA-011 AA-013 AA-014	40 CFR Part 63, Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products	3.B.9	HAPs	General Applicability

7876 PER20130001

Draft/Proposed

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R.1.4.B(1)	3.B.10	SO <sub>2</sub>	≤ 500 ppm
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)	3.B.11	Fuel Restriction	Woodwaste is defined as sawdust, bark, green chips, dry chips, ends, plywood trim, and planer shavings.
AA-017	11 Miss. Admin. Code Pt. 2, R.1.4.A(1).	3.B.6	SO <sub>2</sub>	4.8 lbs./MMBTU
	40 CFR Part 63, Subpart ZZZZ- National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal combustion Engines (RICE)  (40 CFR 63.6585(a)&(b), 63.6590(a)(2)(ii), and 63.6590(c)(6)&(7))	3.B.12	HAP	Comply with 40 CFR Part 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE)
	40 CFR Part 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) (40 CFR 60.4200(a)(2)(i) and 60.4218)	3.B.13		General Applicability
	40 CFR 60.4211(f), Subpart IIII	3.B.14	Hours of operation	No limit on operational hours in emergencies; may operate up to 100 hours/yr in non-emergencies specified in the condition
	40 CFR 60.4205(b), 60.4202(a)(2) and 60.4206), Subpart IIII  Table 1 in 40 CFR 89.112 40 CFR 89.113	3.B.15	PM	0.3 g/kW-hr
			NMHC + NO <sub>x</sub>	4.0 g/kW-hr
			CO	5.0 g/kW-hr
			Opacity	40 CFR 89.113
	40 CFR 60.4207(b), 80.510(b), Subpart IIII	3.B.16	Fuel Limitation	Use diesel fuel with a maximum sulfur content of 15ppm and maximum aromatic content of 35 volume % or a minimum cetane index of 40.
	40 CFR 60.4211(a) and (c), Subpart IIII	3.B.17	Operating Restrictions	The engine shall be operated and maintained according to the manufacturer's emission related settings and instructions and shall meet the applicable requirements in 40 CFR Parts 89, 94, and 1068.

3.B.1. Emission Point AA-001 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and

7876 PER20130001

Draft/Proposed

Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. Emission Point AA-001 is an existing large boiler that is in the “hybrid suspension/grate burner designed to burn wet biomass/bio-based solid” fuel subcategory as listed in 40 CFR 63.7499(h) and as defined in 63.7575. (Ref.: 40 CFR 63.7485, 63.7490, 63.7495(b), 63.7499(h) and (l), Subpart DDDDD)

- 3.B.2. The permittee shall operate and maintain Emission Point AA-001, including any associated pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The emissions from Emission Point AA-001 shall not exceed:
- (a) Filterable PM - 0.44 lb/MMBtu of heat input or 0.55 lb/MMBTU of steam output
  - (b) CO – 3,500ppm @ 3% O<sub>2</sub> or 3.5 lbs /MMBTU of steam output
  - (c) Hg – 0.0000057 lb/MMBtu of heat input or 0.0000064 lb/MMBTU of steam output.
  - (d) HCl - 0.022 lb/MMBtu of heat input or 0.025 lb/MMBTU of steam output

For Emission Point AA-001, the emission limits in Table 2, work practice standards in Table 3, and operating limits in Table 4 of Subpart DDDDD of Part 63 apply at all times the emission point is in operation, except during startup and shutdown. (Ref.: 40 CFR 63.7500(a)(3), 63.7500(f), and 63.7505(a), Subpart DDDDD)

- 3.B.3. Emission Point AA-001 shall meet the following operating limits from Table 4 of Subpart DDDDD that are applicable:
- (a) Maintain the daily 30-day rolling average operating load of the boiler so that it does not exceed 110 percent of the highest hourly average operating load recorded during qualifying test runs, in accordance with the operating limits establishment, confirmation and reestablishment requirements of Subpart DDDDD.
  - (b) Operate the oxygen trim system on the boiler with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during a qualifying CO performance test according to Table 7 of Subpart DDDD.

(Ref.: 40 CFR 63.7500(a)(2) and Items 6, 7 and 8 of Table 4, Subpart DDDDD)

- 3.B.4. For Emission Points AA-001, the permittee shall use a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge derived from the facility’s sawmill and/or planer mill as fuel. This fuel may be supplemented only by uncontaminated wood waste from off-site sources. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))

7876 PER20130001

Draft/Proposed
----------------

- 3.B.5. For Emission Point AA-001, fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil 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.: 11 Miss. Admin. Code Pt. 2, R.1.3.D(2))
- 3.B.6. For Emission Points AA-001 and AA-017, 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))
- 3.B.7. The maximum steam production from Emission Point AA-001, the woodwaste boiler, is limited to 257,400,000 lbs of steam per year, to be determined on a 12-month rolling basis. (Ref.: Federally enforceable limit established in Permit to Construct issued June 21, 2016, modified herein; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))
- 3.B.8. The permittee is restricted to the following dry lumber production in any consecutive twelve (12) month period.
- |        |                 |
|--------|-----------------|
| AA-011 | 66,000 MBF/year |
| AA-013 | 61,440 MBF/year |
| AA-014 | 87,560 MBF/year |
- (Ref.: Federally enforceable limit established in Permit to Construct issued June 21, 2016, modified herein; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))
- 3.B.9. The permittee is subject to and shall comply with 40 CFR 63 Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products. Emission Points AA-011, AA-013 and AA-014 are affected sources per 40 CFR 63.2231(a) of the rule. However, the only applicable requirement is the initial notification. There are no other applicable monitoring, recordkeeping, or reporting requirements for these emission points in Subpart DDDD. (Ref.: 40 CFR 63.2231, Subpart DDDD)
- 3.B.10. For Emission Points AA-013 and AA-014, the permittee shall not cause or permit the emission of gas containing sulfur oxides (measured as Sulfur Dioxide) in excess of 500 ppm (volume) from any process equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.4.B(1))
- 3.B.11. For Emission Points AA-013 and AA-014, the permittee is authorized to burn as fuel only uncontaminated wood waste. For purposes of this permit, wood residue is defined as sawdust, bark, green chips, and planer shavings generated from the processing of harvested timber and may be purchased from outside sources. Additionally, the permittee is authorized to use startup fuel to ignite the fuel bed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 3.B.12. Emission Point AA-017 is subject to and shall comply with the applicable requirements
- 7876 PER20130001

of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal combustion Engines (RICE). The engine is a new emergency compression ignition (CI) RICE with a site rating less than 500 brake HP located at a major source of HAP emissions. As such, the engine is required to meet the requirements of this standard by meeting the requirements of 40 CFR Part 60, Subpart IIII. The engine is an emergency stationary RICE provided it meets the definition in 40 CFR 63.6675 and Condition 3.B.14. No further requirements under the provisions of 40 CFR Part 63, Subpart ZZZZ apply. (Ref: 40 CFR 63.6585(a)&(b), 63.6590(a)(2)(ii), and 63.6590(c)(6)&(7), Subpart ZZZZ )

3.B.13. Emission Point AA-017 is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) and 40 CFR Part 60, Subpart A - General Provisions, as specified in Table 8 of Subpart IIII. The engine is a 2008 model year emergency stationary CI ICE with a site rating of 130 HP and a displacement of less than 10 liters per cylinder that uses diesel fuel. The engine is an emergency stationary ICE provided it meets the definition in 40 CFR 60.4219 (Ref: 40 CFR 60.4200(a)(2)(i), Subpart IIII)

3.B.14. For Emission Point AA-017, the permittee shall operate the engine according to these requirements:

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in (1) through (3) for a maximum of 100 hours per calendar year.
  - (1) Operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
  - (2) Operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy

Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

- (3) Operated for periods where there is a deviation of voltage or frequency of 5 percent greater below standard voltage or frequency.
- (c) The Emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations and these hours are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in part (b) of this condition. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

If the emergency engine is not operated according to the requirements in (a) through (c) above, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart IIII and must meet the applicable requirements for non-emergency engines. (Ref.: 40 CFR 60.4211(f), Subpart IIII)

3.B.15. For Emission Point AA-017, the permittee shall comply with the emission standards for new nonroad CI engines for the applicable model year and maximum engine power as outlined in the table of Section 3.B above and 40 CFR 89.112 and 40 CFR 89.113 for the entire life of the engine. (Ref: 40 CFR 60.4205(b), 60.4202 (a)(2) and 60.4206, Subpart IIII)

3.B.16. For Emission Point AA-017, the permittee shall use diesel fuel that meets the following requirements:

- (a) Maximum sulfur content of 15 ppm, and
- (b) Either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

Any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. (Ref: 40 CFR 60.4207(b) and 80.510(b), Subpart IIII)

3.B.17. For Emission Point AA-017, the permittee shall comply with the emission limitations in Condition 3.B.15 by purchasing an engine certified by the manufacturer to those standards. The permittee shall install, configure, operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; change only those emission-related settings that are permitted by the manufacturer; and meet all the applicable requirements of 40 CFR parts 89, 94 and/or 1068. If all of the requirements of this condition are not met, the permittee shall instead demonstrate compliance according to Condition 5.B.11. (Ref: 40 CFR 60.4211(a))

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.C.3	PM	$E = 4.1p^{0.67}$

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

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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.C.3 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:

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

Where: *E* is the emission rate in pounds per hour; *p* is the process weight input rate in tons per hour, where *E* is determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A. 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))

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Limit/Standard
AA-001	40 CFR 63.7510(e), 63.7575 and Item 4 of Table 3, Subpart DDDDD	3.D.1	One-time Energy Assessment
	40 CFR 63.7540(a)(10)(i)-(vi), (12) and (13) and Item 1 of Table 3, Subpart DDDDD	3.D.2	Initial and Subsequent Tune-ups
	40 CFR 63.7500 and Items 5 and 6 of Table 3, Subpart DDDDD	3.D.3	Startup and shutdown conditions

3.D.1 For Emission Point AA-001, the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in 40 CFR 63.7575. An energy assessment that has been completed after January 1, 2008, that meets or is amended to meet the energy assessment requirements listed in (a) through (h) below satisfies the energy assessment requirement. The energy assessment must include all data elements listed in (a) through (h) below with the extent of the evaluation for items (a) through (e) being appropriate for the on-site technical hours specified for an energy assessment in 40 CFR 63.7575.

- (a) A visual inspection of the boiler or process heater system.
- (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
- (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- (e) A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.
- (f) A list of cost-effective energy conservation measures that are within the facility's control.
- (g) A list of the energy savings potential of the energy conservation measures identified.

7876 PER20130001

Draft/Proposed

- (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

(Ref.: 40 CFR 63.7510(e), 63.7575 and Item 4 of Table 3, Subpart DDDDD)

- 3.D.2 For Emission Point AA-001, the permittee shall complete an initial tune-up in accordance with (a) through (f) below. The subsequent required tune-up identified below shall also be in accordance with (a) through (f) below.

The subsequent tune-up for Emission Point AA-001 shall be completed no more than sixty-one (61) months after the previous one. If the unit is not operating on the required date of the tune-up, the tune-up must be conducted within thirty (30) calendar days of startup.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown not to exceed seventy-two (72) months from the previous inspection). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by MDEQ, a report containing the following information:

7876 PER20130001

Draft/Proposed
----------------

- (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
- (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.7510(e), 63.7515(d), 63.7540(a)(10), (12) and (13) and Table 3, Subpart DDDDD)

3.D.3 For Emission Point AA-001, the permittee shall operate the boilers in accordance with the requirements found in (a) through (c) during periods of startup and shutdown:

- (a) For startup the permittee must use one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
- (b) Emissions must be vented to the main stacks and all control devices must be engaged if the permittee starts burning non-clean biomass during startup or shutdown.
- (c) All applicable records required by Condition 5.B.5 (g) and (h) must be kept during periods of startup and shutdown.

(Ref.: 40 CFR 63.7500(f), 63.7540(d), 63.7555 and Items 5 and 6 of Table 3, Subpart DDDDD)

## 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

## 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)
- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from

7876 PER20130001

Draft/Proposed
----------------

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001	40 CFR 63.7510(a), 63.7515(a) and (b), 63.7520(a),(b),(c),(d), and (e), 63.7530(a) and (b), 63.7545(d), and Table 5, Subpart DDDDD	5.B.1	PM, HCl, Hg and CO	Initial Compliance Testing
	40 CFR 63.7525(a) and 63.7575, Subpart DDDDD	5.B.2	CO	Installing an oxygen analyzer system
	40 CFR 63.7540(a)(1),(2)(ii) & (10) and (b), Items 1 and 10 of Table 8, Subpart DDDDD	5.B.3	PM, HCl, Hg and CO	Continuous compliance
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.4	Steam Production	Recording steam production, on a 12-month rolling total
	40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD	5.B.5	PM, HCl, Hg and CO	Recordkeeping
AA-001 AA-007 AA-008 AA-009 AA-016	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.6	Opacity	Weekly Visible Emissions Observations
AA-011 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.7	Dry Lumber Production	Monthly records

7876 PER20130001

Draft/Proposed

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.8	Maintenance Inspections	Monthly Records
	40 CFR 52.21(r)(6)(iii), Subpart A	5.B.9	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , NO <sub>x</sub> , CO, VOC, SO <sub>2</sub> , Pb, and SAM/ Actual Emission Calculations	Monitoring and Recordkeeping
AA-017	40 CFR 60.4209(a), Subpart III	5.B.10	Hours of operation	Install a non-resettable hour meter prior to start-up
	40 CFR 60.4211(g), Subpart III	5.B.11	Recordkeeping	If the engine is not operated as required in Condition 3.B.17, then demonstrate compliance with 5.B.11
	40 CFR 60.4214(b), Subpart III	5.B.12	Recordkeeping	Keep records of the time and the reason the engine was in operation

5.B.1. For Emission Point AA-001, the permittee shall demonstrate initial compliance with the PM, CO, HCl and Hg limitations in Table 2 of 40 CFR Subpart DDDDD by stack testing and establishing operating limits. Stack testing must be performed in accordance with the requirements in 40 CFR 63.7520 and Table 5 of Subpart DDDDD by July 29, 2016, and submittal of the test report no later than sixty days after the testing is complete.

The permittee shall submit data on the operating load conditions, including steam flow rate and oxygen concentration in the firebox, observed during each of the performance test runs. This data will be used to set the allowable 30-day rolling average operating load in accordance with Condition 5.B.3 and the minimum allowable oxygen trim system set point in accordance with Condition 3.B.3.

If the performance tests for a given pollutant (PM, CO, HCl and Hg) for at least 2 consecutive years (stack testing performed by July 29, 2016 and August 31, 2017) show that emissions are at or below 75 percent of the emission limit for the pollutant, and if there are no changes in the operation of the individual boiler or air pollution control equipment that could increase emissions, the permittee may choose to conduct performance tests for the pollutant every third year (stack testing performed by August 31, 2020). Each such performance test must be conducted no more than 37 months after the previous performance test.

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).

The permittee must develop a site-specific test plan according to the requirements in 40 CFR 63.7(c) and upon request make available to MDEQ any records necessary to determine the conditions of the performance tests. The permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

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 sixty (60) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. If necessary, a pretest conference at least sixty (60) days prior to the scheduled test date may be requested to ensure that all test methods and procedures are acceptable to the DEQ. (Ref.: 40 CFR 63.7510(a)(1),(3), and (4), 63.7515(a) and (b), 63.7520(a),(b),(c),(d), and(e), 63.7530(a) and (b), 63.7545(d), and Table 5, Subpart DDDDD)

- 5.B.2. For Emission Point AA-001, the permittee shall install, operate, and maintain an oxygen analyzer system. An oxygen analyzer system means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in the boiler or process heater flue gas, boiler or process heater, firebox, or other appropriate location. This includes oxygen trim systems. The source owner or operator must install, calibrate, maintain, and operate the oxygen analyzer system in accordance with the manufacturer's recommendations. (Ref.: 40 CFR 63.7525(a) and 63.7575, Subpart DDDDD)
- 5.B.3. For Emission Point AA-001, the permittee shall demonstrate continuous compliance with the emission limits, the work practice standards and the operating limits according to the applicable methods listed in (a) through (g) of this Condition and specified in 40 CFR 63.7540 and Table 8 of Subpart DDDDD
- (a) Operate the oxygen trim system on the boiler according to Condition 3.B.3
  - (b) Collect the operating load data every 15 minutes.
  - (c) Reduce the data to a 30-day rolling average and maintain the 30-day rolling average operating load such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test according to Condition 5.B.1.
  - (d) After the initial compliance demonstration is completed, operation above the established maximum or below the established minimum operating limit is a

deviation of established operating limits listed in Condition 3.B.3 except during performance tests conducted to determine compliance with the emission limits or to establish new operating limits. Operating limits must be confirmed and reestablished during performance tests.

- (e) As specified in Condition 5.B.5, you must keep records of the type and amount of all fuels burned in the boiler during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in equal to or lower fuel input of chlorine, mercury, and TSM than the maximum values calculated during the last performance test.
- (f) Conduct a tune-up in accordance with Condition 3.D.2
- (g) Report each instance in which the boilers did not meet the emission limits and operating limits in Conditions 3.B.2 and 3.B.3. These instances are considered deviations and as such must be reported according to the requirements of Condition 5.A.5.

(Ref.: 40 CFR 63. 7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8, Subpart DDDDD)

5.B.4. For Emission Point AA-001, the permittee shall record the amount of steam produced on a daily basis and calculate the 12-month rolling total. These records shall be maintained on site for at least five (5) years and shall be made available upon request to Office of Pollution Control personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.B.5. For Emission Point AA-001, the permittee must keep all applicable records required in (a) through (i).

- (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting and Initial Notification and Notification of Compliance Status or semiannual compliance report you submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv).
- (b) Records of performance tests and other compliance demonstrations and performance evaluations as required by 40 CFR 63.10(b)(2)(xiv)
- (c) Keep the records required by Condition 5.B.3 including records of all monitoring data and calculated averages for applicable operating limits, such as opacity and operating load, to show continuous compliance with each emission limit and operating limit that applies to you.
- (d) Keep records of monthly fuel use by each boiler, including the types of fuel and amount used.

7876 PER20130001

Draft/Proposed
----------------

- (e) Records of the occurrence and duration of each malfunction of the boilers and or the associated air pollution control equipment.
- (f) Records of actions taken during periods of malfunction to minimize emissions in accordance with general duty to minimize emissions in 40 CFR 63.7500(a)(3), including corrective actions to restore the malfunctioning boilers, air pollution controls or monitoring equipment to normal or usual manner of operation.
- (g) Maintain records of the calendar date, time, occurrence, and duration of each startup and shutdown.
- (h) Maintain records of the types and amounts of fuels used during startup and shutdown.
- (i) Retain the required records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: 40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD)

5.B.6. For Emission Points AA-001, AA-007, AA-008, AA-009 and AA-016, the permittee shall perform weekly visual observations of the exhaust stack and keep records of each observation. If any visible emissions are detected which appear to be in excess of the applicable state regulation, then the permittee shall perform a visible emissions evaluation (VEE) using 40 CFR Part 60, Appendix A, Method 9. If VEE readings cannot be taken using 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. The permittee shall submit a summary report to MDEQ on a semi-annual basis. 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.B.7. For Emission Points AA-011, AA-013 and AA-014, for each kiln separately, the permittee shall record the amount of lumber dried (in board-feet) on both a monthly basis and a total for each consecutive twelve (12) month period.

These records shall be maintained on site for at least five (5) years and shall be made available upon request to Office of Pollution Control personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.B.8. For all pollution control equipment, maintenance inspections shall be performed each month, or more often as needed, and maintenance shall be performed as dictated by

inspection results so that proper operation of the equipment is maintained. Records of any inspections and/or maintenance 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 have access at all times to sufficient equipment as is necessary to repair and/or replace the pollution control equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.B.9. The permittee shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the projects covered by this permit and calculate and maintain a record of the annual emissions, in tons/yr on a calendar year basis, for a period of ten (10) years following resumption of regular operations after the change. The permittee shall submit a report to the DEQ if the annual emissions (tons/year), from the projects covered by the Permit to Construct issued on June 21, 2016 and herein exceed the baseline actual emissions (as documented in the project application for permit to construct), by a significant amount for any regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented in the associated permit application. The permittee shall conduct this monitoring for a period of ten (10) years following resumption of regular operations after the change. Such report shall be submitted to the DEQ within sixty (60) days after the end of such year. The report shall contain the following:

- (a) The name, address, and telephone number of the major stationary source;
- (b) The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii); and,
- (c) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

(Ref.: Federally Enforceable Permit to Construct issued on June 21, 2016 and modified herein)

5.B.10 For Emission Point AA-017, the permittee shall install a non-resettable hour meter prior to startup of the engine. (Ref: 40 CFR 60.4209(a), Subpart IIII)

5.B.11 For Emission Point AA-017, if the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, as required in Condition 3.B.17, or the emission-related settings are changed in a way that is not permitted by the manufacturer, compliance must be demonstrated as follows:

- (a) Must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

- (b) Must conduct an initial performance test as described in 40 CFR 63.4212 to demonstrate compliance with the emission standards in Condition 3.B.15 within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. (Ref: 40 CFR 60.4211(g), Subpart IIII)

5.B.12 For Emission Point AA-017, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. The records shall be maintained in accordance with Condition 5.A.3. (Ref: 40 CFR 60.4214(b) and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2))

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001	40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9 Subpart DDDDD	5.C.1		Notification of Compliance Status
	40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9, Subpart DDDDD (§)	5.C.2		Submit semi-annual report
All Emission Points	11Miss. Admin. Code Pt. 2, R.2.B(10)	5.C.3	Steam Production, Dry Lumber Production, Opacity	Submit semi-annual report

5.C.1 For Emission Point AA-001, the permittee shall submit a Notification of Compliance Status to MDEQ, by the end of the 60<sup>th</sup> day following the completion of all performance tests required by Condition 5.B.1. The Notification of Compliance Status report must include the following (a) through (j) for each unit as applicable:

- (a) A description of the affected unit including identification of which subcategory the unit is in, the design heat input capacity of the unit, and description of the fuel burned in the unit.
- (b) Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance including all established operating limits, and including:
  - (1) Identification of whether you are complying with the PM emission limit or the alternative TSM emission limit.

7876 PER20130001

Draft/Proposed

- (2) Identification of whether you are complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.
- (c) A summary of the maximum CO emission levels recorded during the performance test to show that the permittee has met the applicable emission standard.
- (d) Identification of whether the permittee plans to demonstrate compliance with each applicable emission limit through performance testing or CEMS
- (e) Identification of whether the permittee plans to demonstrate compliance by emissions averaging and identification of whether the permittee plans to demonstrate compliance by using efficiency credits through energy conservation:
  - (1) If you plan to demonstrate compliance by emission averaging, report the emission level that was being achieved or the control technology employed on January 31, 2013.
- (f) If there was a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
- (g) A certification stating “This facility has met all applicable emission limits and work practice standards.”
- (h) A certification stating “This facility has had an energy assessment performed according to the procedures listed in Table 3 to Subpart DDDDD of Part 63—Work Practice Standards.”
- (i) A certification stating “This facility complies with the required tune-up according to procedures listed in 40 CFR 63.7540(a)(10) (i) through (vi).”
- (j) A certification stating “No secondary materials that are solid waste were combusted in any affected unit.”

(Ref.: 40 CFR 63.7530(e) and 63.7545(e)(1) through (8), Subpart DDDDD)

5.C.2 For Emission Point AA-001, the permittee shall submit the information listed in (a) through (l) in accordance with the semi- annual reporting requirements listed in Condition 5.A.4 of this permit.

- (a) Company and Facility name and address

7876 PER20130001

Draft/Proposed
----------------

- (b) Process unit information, emission limits and operating limits
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The total fuel use by the boiler within the reporting period, including but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the permittee's basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.
- (e) If the permittee is conducting performance test every 3 years in accordance with Condition 5.B.1, the date of the last two performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
- (f) Statement indicating that the permittee has burned no new types of fuel in the boilers.
- (g) If there are no deviations from any emission limits and operating limits from Conditions 3.B.2 and 3.B.3, a statement that there were no deviations from the emission limits and operating limits during the reporting period.
- (h) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period that may have caused or caused an emission limit to be exceeded. Also, include a description of any actions taken by the permittee during the malfunction of the boiler or air pollution control devices to minimize emissions in accordance with Condition 3.B.2, including what actions were taken to correct the malfunction
- (i) For every instance of startup or shutdown include the information required to be monitored, collected, or recorded by Condition 5.B.5 (g) and (h).
- (j) For each deviation from an emission limit or operating limit the compliance report must additionally contain:
  - (1) A description of the deviation and which emission limit or operating limit from which you deviated
  - (2) Information on the number, duration, and cause of deviations (including unknown cause) and the corrective action taken.
  - (3) If the deviation occurs during an annual performance test, provide the date the annual performance test was completed.

- (k) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report
- (l) Results of any performance tests and compliance reports identified in 40 CFR 40 CFR 63.7550(h)(1) through (3) shall be submitted to EPA's WebFIRE database using the Compliance and Emissions Data Reporting Interface that can be accessed through EPA's Central Data Exchange (CDX – [www.epa.gov/cdx](http://www.epa.gov/cdx)) unless the reporting form specific to this subpart is not available in CEDRI at the time that the report is due. All performance tests and compliance reports identified in 40 CFR 63.7550(h)(1) through (3) shall also be submitted to MDEQ.

(Ref.: 40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9, Subpart DDDDD)

5.C.3 The permittee shall submit a semi-annual report summarizing:

- (a) the total amount of steam produced on a daily basis and the calculated total for a rolling twelve (12) month period for Emission Point AA-001;
- (b) the opacity observations for Emission Point AA-001, AA-007, AA-008, AA-009, AA-015 and AA-016;
- (c) for Emission Points AA-011, AA-013 and AA-014, for each kiln separately, the total amount of lumber dried each month and the total for each rolling twelve (12) month period.

The semi-annual reporting period shall be from January 1 to June 30 and July 1 to December 31. The report shall be submitted no later than January 31 and July 31 for the previous six-month period. (Ref.: 11Miss. Admin. Code Pt. 2, R.2.B(10))

## 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://www.ecfr.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

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3. Episodes	Regulations for the Prevention of Air Pollution Emergency
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 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 <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound