

**State of Mississippi**

**AIR POLLUTION CONTROL PERMIT**

**Permit To Construct Air Emissions Equipment**

**THIS CERTIFIES**

**Von Drehle Corporation**

**30 Majorca Road**

**Natchez, MS**

**Adams 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**

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**Mississippi Department of Environmental Quality**

Issued/Modified: **SEP 26 2014**

Expires:

Permit No. 0040-00046

Agency Interest # 101

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## Permit To Construct Air Emissions Equipment

Von Drehle Corporation  
Subject Item Inventory  
Permit Number:0040-00046  
Activity ID No.: PER20140001

### Subject Item Inventory:

ID	Designation	Description
AI101		
CONT1	AA-001	Mist Collection System (Facility Ref. No.EP-154-00101)
CONT2	AA-002	WetDust Collection System (Facility Ref. No. EP-154-00201)
EQPT3	AA-003	Yankee Hood Exhaust with a 22.4 MMBtu/hr dryer (Facility Ref. No. EP-152-00101)
EQPT5	AA-004	Natural Gas Boiler with 60.2 MMBtu/hr duty. (Facility Ref. No. EP-181-00501)

### KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

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### AI0000000101:

#### Limitation Requirements:

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Condition No.	Parameter	Condition
L-1		Particulate Matter: For emission points AA-001 and AA-002, the permittee shall not allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = 4.1 p^{0.67}$ where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.F]

#### Submittal/Action Requirements:

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Condition No.	Condition
S-1	General Condition: The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ 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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D.]
S-2	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin.Code Pt. 2, R.2.5.C(2).]
S-3	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. [11 Miss. Admin.Code Pt. 2, R.2.5.C(4).]

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### AI0000000101 (continued):

#### Narrative Requirements:

##### General Condition:

Condition No.	Condition
T-1	General Condition: The stationary source shall be designed and constructed so as to operate without causing a violation of any Applicable Rules and Regulations or this permit, 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. [11 Miss. Admin.Code Pt. 2, R.2.5.A.]
T-2	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49_17_29 1.b]
T-3	General Condition: 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. [Miss. Code Ann. 49_17_29]
T-4	General Condition: 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 Regulation 11 Miss. Admin. Code Pt.2, R. 1.10 "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [11 Miss. Admin. Code Pt. 2, R. 1.10]
T-5	General Condition: The permittee shall allow the Mississippi Environmental Quality Commission, the Mississippi Environmental Quality Permit Board, MDEQ staff and/or their authorized representatives, upon the presentation of credentials: a. To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring equipment or monitoring method required in this permit, and to sample any air emission. [Miss. Code Ann. 49_17_21]
T-6	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for good cause shown including, but not limited to, the following: a. Persistent violation of any terms or conditions of this permit; b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or c. A change in any condition that requires either a temporary or permanent reduction or elimination of previously authorized air emissions. [11 Miss. Admin.Code Pt. 2, R.2.2.C.]
T-7	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49_17_39]

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### AI0000000101 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-8	General Condition:This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R.2.1.D.]
T-9	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]
T-10	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(6).]
T-11	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.1.D(7).]
T-12	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]
T-13	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-14	General Condition: The permit does not convey any property rights of any sort, or any exclusive privilege. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(c).]
T-15	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(d).]
T-16	General Condition: This permit shall not be transferred except upon approval of the Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.16.B.]

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### AI0000000101 (continued):

#### Narrative Requirements:

Condition No.	Condition
T-17	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.1.1.D(7).]
T-18	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.5.C(1).]
T-19	General Condition: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. [11 Miss. Admin.Code Pt. 2, R.2.5.D(3).]
T-20	General Condition: Except as prohibited in 11 Miss. Admin. Code Pt. 2,R. 2.5.D(7) 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 APC-S-2, Section XIII.G. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).]
T-21	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), 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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).]
T-22	General Condition: Except as otherwise specified in 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7), 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. [11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).]
T-23	General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.5.D(7).]

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### AI0000000101 (continued):

#### Narrative Requirements:

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Condition No.	Condition
T-24	<p>General Condition: Regarding compliance testing:</p> <p>(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.</p> <p>(b) Compliance testing will be performed at the expense of the permittee.</p> <p>(c) Each emission sampling and analysis report shall include but not be limited to the following:</p> <ol style="list-style-type: none"><li>1. detailed description of testing procedures;</li><li>2. sample calculation(s);</li><li>3. results; and</li><li>4. comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit. [11 Miss. Admin.Code Pt. 2, R.2.6.B(3),(4)&amp;(6).]</li></ol>
T-25	<p>General Condition: 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. [11 Miss. Admin.Code Pt. 2, R.2.5.A(4).]</p>

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**CONT0000000001 (AA-001) Mist Collection System (Facility Ref. No.EP-154-00101):**

Narrative Requirements:

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Condition No.	Condition
T-1	Beginning upon permit issuance date , the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-001, the Mist Collector (Ref. no EP-154-00101) associated with the Tissue Machine. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10)]

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**CONT0000000002 (AA-002) WetDust Collection System (Facility Ref. No. EP-154-00201):**

Narrative Requirements:

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Condition No.	Condition
T-1	Beginning upon permit issuance date , the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-002, the Dust Collector (Ref. no EP-154-00201) associated with the Tissue Machine. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10)]

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### EQPT0000000003 (AA-003) Yankee Hood Exhaust with a 22.4 MMBtu/hr dryer (Facility Ref. No. EP-152-00101):

#### Narrative Requirements:

##### Particulate Matter:

Condition No.	Condition
T-1	Particulate Matter: For emission point AA-003, emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{0.1667}$ where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.D(b)]
T-2	For emission point AA-003, 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. [11 Miss. Admin. Code Pt. 2, Ch. 1. 4.A(1)]
T-3	Beginning upon permit issuance date, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-003, the Yankee Hood (Ref. no EP-152-00101) with a 22.4 MMBtu/hr dryer associated with the Tissue Machine. The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified herein. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10)]

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### EQPT0000000005 (AA-004) Natural Gas Boiler with 60.2 MMBtu/hr duty. (Facility Ref. No. EP-181-00501):

#### Narrative Requirements:

##### Particulate Matter:

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Condition No.	Condition
T-1	Particulate Matter: For emission point AA-004, emissions from installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship $E = 0.8808 * I^{-0.1667}$ where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, Ch. 1. 3.D(b)]

##### Sulfur Dioxide:

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Condition No.	Condition
T-2	Sulfur Dioxide: For emission point AA-004, 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. [11 Miss. Admin. Code Pt. 2, Ch. 1. 4.A(1)]

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Condition No.	Condition
T-3	Beginning upon permit issuance date, the permittee is authorized to construct air emissions equipment for the emission of air contaminants from Emission Point AA-004, the Natural Gas Boiler(Ref. no EP-181-00501) The air emissions equipment shall be constructed to comply with the emission limitations and monitoring requirements specified herein. [11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(10)]
T-4	For emission point AA-004, the permittee shall comply with the applicable requirements of any subsequent revisions of New Source Performance Standards, 40 CFR 60, Subpart Dc. [40 CFR 60_SUBPART Dc.60.40c((a))]

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**EQPT0000000005 (continued):**

Narrative Requirements:

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Condition No.	Condition
T-5	For emission point AA-004, the permittee shall record and maintain records of the amount and type of fuel combusted during during each calendar month. All records should be maintained for a period of two years following the date of such record. These records shall be submitted in report from semiannually and shall be post-marked no later than thirty (30) days following the end of the semi-annual reporting periods ending June 30 and December 31. [40 CFR 60_SUBPART Dc.60.48c((g),(i))(and (j))]

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## GENERAL INFORMATION

Von Drehle Corporation  
30 Majorca Road  
Natchez, MS  
Adams County

### Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
101	Von Drehle Corporation	Official Site Name	3/4/2013	
2800100046	Von Drehle Corporation	Air-AIRS AFS	10/12/2000	
MSD009305749	Mississippi River Corporation	Hazardous Waste-EPA ID	10/12/2000	4/8/2013
004000046	Mississippi River Corporation	Air-State Operating	12/19/1978	12/1/1981
MSR000044	Mississippi River Corporation	GP-Baseline	9/22/1992	10/27/2000
MS0001309	Mississippi River Corporation	Water - NPDES	12/19/1995	12/18/2000
MS0001309	Mississippi River Corporation	Water - NPDES	1/26/2001	11/28/2005
SW0010040425	Mississippi River Coporation, MRC Sludge Disposal Landfill	SolidWaste - NonMSW Landfill	10/26/1993	10/26/2003
MSR000044	Mississippi River Corporation	GP-Baseline	10/27/2000	1/25/2006
MS0001309	Mississippi River Corporation	Water - NPDES	11/29/2005	10/31/2010
MSR000044	Mississippi River Corporation	GP-Baseline	1/25/2006	9/30/2010
101	Mississippi River Corporation	Historic Site Name	12/19/1978	11/22/2010
MSR000044	Mississippi River Pulp LLC	GP-Baseline	11/22/2010	3/11/2013
MS0001309	Mississippi River Pulp LLC	Water - NPDES	8/16/2011	3/11/2013
101	Mississippi River Pulp, LLC	Historic Site Name	11/22/2010	3/8/2013
MS0001309	Von Drehle Corporation	Water - NPDES	3/11/2013	7/31/2016
MSR000044	Von Drehle Corporation	GP-Baseline	3/11/2013	9/28/2015
MSD009305749	Von Drehle Corporation	Hazardous Waste-EPA ID	4/8/2013	
101	MS River Co., Paper Recycling Plant	Air-Notification	4/19/2013	
004000046	Von Drehle Corporation	Air-Construction	9/26/2014	

**Basin:** Mississippi River Basin - direct dischargers to N

## GENERAL INFORMATION

**Location Description:** Imported from I-sys