

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Johnston Tombigbee Furniture Company, Columbus Plant Number 2  
1503 Johnston Street  
Columbus, MS  
Lowndes 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: DEC 17 2014

Effective Date: As specified herein.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: November 30, 2019

Permit No.: 1680-00024

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

### **APPENDIX B NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM WOOD FURNITURE MANUFACTURING OPERATIONS, 40 CFR SUBPART JJ- TABLES 2,3,4,5 AND 6**

### **APPENDIX C CAM PLAN**

## 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 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).)
- 1.5 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 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).)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 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.)
- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of

the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 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.)

- 1.19 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."
- 1.20 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).)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;



- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
  - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
    - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
      - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (ii) the source was at the time being properly operated;
      - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
      - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
      - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
    - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
  - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
  - (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
    - (i) the permittee can identify the need for the maintenance;
    - (ii) the source was at the time being properly operated;
    - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
    - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
  - (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 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

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-008	Finishing Room Operation (ref. no's. 7A – 7V, 7X, and 7Y) which includes the application of various stains, lacquers, topcoats, and sealers. Finishing Room Operation also includes cleaning operations in which organic solvent is used to remove coating materials from equipment; and in such operations where strippable spray booth material is used in the manufacture of wood furniture.
AA-011	Baghouse #1 controls emissions from the Cutting and Ripping Line. In this line, lumber is cut to specific lengths and widths for further processing into furniture components. This emission point, also, includes emissions from the cold press room where contact adhesives are applied.
AA-012	Baghouse #2 controls emissions from the Moulder and Tenoner Line. In this line, furniture parts are processed by cutting and shaping to a final size.
AA-013	Baghouse #3 controls emissions from the Machine Room Line. This line utilizes shaping, boring, sawing, and other techniques to produce wood furniture parts. This emission point, also, includes emissions from the cold press room where contact adhesives are applied.
AA-014	Baghouse #4 controls emissions from the Sanding Line and a moulder and router operation. In the Sanding Line, the wood furniture parts are sanded prior to being finished.
AA-015	A Closed-Loop Cyclone controls emissions from the Chip Bin Line. Wood residue from Emission Points AA-011 through AA-014 is sent to the Chip Bin for wood waste handling and disposal.
AA-016	Flat Line Surface Coating Operation with a 0.52 MMBTU/Hr boiler. In this operation, furniture parts are applied various stains, lacquers, topcoats, and sealers. Furniture components are then passed through a hot air flash oven, gelling oven, and uv curing oven.
AA-017	Flat Line Sanding Operation. In this operation, unfinished furniture components are sanded. A dust collector which vents inside the building controls emissions from this operation.
AA-018	Sample Spray Booth. In this booth, unfinished wood furniture components are sprayed with sample stains, sealers, and topcoats to develop new products for the Flat Line Sanding Operation. This booth is also used for repair and touch-up operations.
AA-019	A direct fired Natural Gas Air Make-up Unit with capacity of 12.678 MMBtu/hr used for space heat.

### 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-008 AA-016 AA-018	40 CFR 63, Subpart JJ 40 CFR §63.800(a),(e), and (g)	3.B.1	HAP	Applicability
AA-008	40 CFR §63.802(a)(1)	3.B.2	VHAP	1.0 lb VHAP/lb solids, as applied
	40 CFR §63.802(a)(3)	3.B.3	VOC	0.8 lb VOC/lb solids, as applied
	40 CFR §63.802(a)(4)	3.B.4	Formaldehyde	a) Limit total formaldehyde emissions to less than 400 lbs per rolling 12 month period; <b>or</b> , b) Use only low-formaldehyde coatings and adhesives
AA-011 AA-013	40 CFR §63.802(a)(2)	3.B.5	VHAP	1.0 lb VHAP/lb solids
AA-016 AA-018	40 CFR §63.802(b)(1)	3.B.10	VHAP	0.8 lb VHAP/lb solids, as applied

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	40 CFR §63.802(b)(3)	3.B.11	VOC	0.8 lb VOC/lb solids, as applied
	40 CFR §63.802(b)(4)	3.B.12	Formaldehyde	a) Limit total formaldehyde emissions to less than 400 lbs per rolling 12 month period; or, b) Use only low-formaldehyde coatings and adhesives
AA-011 AA-012 AA-013 AA-014 AA-015	11 Miss. Admin. Code Pt.2, R.1.3. F(1)	3.B.6	PM	$E = 4.1(p)^{0.67}$ , not to exceed 10.71 lb/hr and 46.9 TPY* *Total emissions allowed for Emission Points AA-011 through AA-015.
AA-017	11 Miss. Admin. Code Pt.2, R.1.3. F(1)	3.B.6	PM	$E = 4.1(p)^{0.67}$
AA-016	11 Miss. Admin. Code Pt.2, R.1.3. D(1)(a)	3.B.7	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
	11 Miss. Admin. Code Pt.2, R.1.4.A(1)	3.B.8	SO <sub>2</sub>	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions
	40 CFR 63, Subpart DDDDD, §63.7485, §63.7499, §63.7500(e), and Table 3 of Subpart DDDDD	3.B.9	HAPs	General Applicability
AA-019	11 Miss. Admin. Code Pt.2, R.1.3.D(1)(b)	3.B.13	PM	$E=0.8808*I^{*-0.1667}$
	11 Miss. Admin. Code Pt.2, R.1.4.A(1)	3.B.14	SO <sub>2</sub>	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions

3.B.1 Emission Points AA-008, AA-016, and AA-018 are affected by and shall comply with all applicable requirements and limitations and any subsequent revisions of the National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR Part 63, Subpart JJ, and the General Provisions, 40 CFR Part 63, Subpart A.

Emission Point AA-008 is subject to the requirements for existing sources under the rule and Emission Points AA-016 and AA-018 are subject to the new source requirements.  
(Ref.: 40 CFR §63.800 (a),(e) and (g))

3.B.2 For Emission Point AA-008, the permittee shall limit VHAP emissions from the finishing operations as follows:

- (a) if the permittee chooses to use the weighted average method to determine compliance, the VHAP limit is 1.0 lb VHAP/lb solids, as applied;
- (b) if the permittee chooses to use the compliant coatings method to determine compliance, the permittee shall comply with the lb VHAP/lb solids, as applied and the maximum % VHAP allowables found in Table 3 of Subpart JJ. A copy of Table 3 is included in Appendix B of this permit; or
- (c) if the permittee chooses to use a combination of these methods to comply, the VHAP limit is 1.0 lb VHAP/lb solids, as applied.

A list of VHAPs from Table 2 of Subpart JJ is included in Appendix B of this permit. (Ref.: 40 CFR §63.802(a)(1) and Table 3 of Subpart JJ)

3.B.3 For Emission Point AA-008, the permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied. Strippable spray booth material means a coating that:

- (a) is applied to a spray booth wall to provide a protective film to receive overspray during finishing operation,
- (b) that is subsequently peeled off and disposed, and
- (c) by achieving (a) and (b), reduces or eliminates the need to use organic solvents to clean spray booth walls.

(Ref.: 40 CFR §63.802(a)(3) and Table 3 of Subpart JJ)

3.B.4 For Emission Point AA-008, the permittee shall limit formaldehyde emissions by complying with either (a) or (b) below:

- (a) Limit total formaldehyde used in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
- (b) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operation.

(Ref.: 40 CFR §63.802(a)(4) and Table 3 of Subpart JJ)

3.B.5 For Emission Point AA-011 and AA-013, the permittee shall limit VHAP emissions from contact adhesives (including foam adhesives, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates), by using adhesives that contain no more than 1.0 lb VHAP/lb solids, as applied.

(Ref.: 40 CFR §63.802(a)(2) and Table 3 of Subpart JJ)

3.B.6 For Emission Points AA-011, AA-012, AA-013, AA-014, AA-015, and AA-017, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

For Emission Points AA-011 through AA-015, the total emissions allowed shall not exceed 10.71 lb/hr or 46.9 TPY.

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(1).)

- 3.B.7 For Emission Point AA-016, the permittee shall not have particulate emissions from fossil fuel burning installations of less than 10 million BTU per hour heat input that exceeds 0.6 pounds per million BTU per hour heat input.  
(Ref.: 11 Miss. Admin. Code Pt.2, R.1.3. D(1)(a))
- 3.B.8 For Emission Point AA-016, the permittee shall not discharge sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 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.9 Beginning January 31, 2016, Emission Point AA-016 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD.

Emission Point AA-016 is an existing boiler that is in the “units designed to burn gas 1 fuels” subcategory. The permittee shall comply with all applicable Work Practice Standards for such a unit found in Conditions 3.D.13 and 3.D.14 of this permit.  
(Ref.: 40 CFR §63.7485, §63.7499, §63.7500(e), and Table 3 of Subpart DDDDD)

- 3.B.10 For Emission Points AA-016 and AA-018, the permittee shall limit VHAP emissions from the finishing operations as follows:
- (a) if the permittee chooses to use the weighted average method to determine compliance, the VHAP limit is 0.8 lb VHAP/lb solids, as applied;
  - (b) if the permittee chooses to use the compliant coatings method to determine compliance, the permittee shall comply with the lb VHAP/lb solids, as applied and the maximum %VHAP allowables found in Table 3 of Subpart JJ. A copy of Table 3 is included in Appendix B of this permit; or
  - (c) if the permittee chooses to use a combination of these methods to comply, the VHAP limit is 0.8 lb VHAP/lb solids, as applied.
- (Ref.: 40 CFR §63.802(b)(1))



3.B.11 For Emission Points AA-016 and AA-018, the permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied. Strippable spray booth material means a coating that:

- (a) is applied to a spray booth wall to provide a protective film to receive overspray during finishing operation,
- (b) that is subsequently peeled off and disposed, and
- (c) by achieving (a) and (b), reduces or eliminates the need to use organic solvents to clean spray booth walls.

(Ref.: 40 CFR §63.802(b)(3) and Table 3 of Subpart JJ)

3.B.12 For Emission Points AA-016 and AA-018, the permittee shall limit formaldehyde emissions by complying with either (a) or (b) below:

- (a) Limit total formaldehyde used in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
- (b) Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operation.

(Ref.: 40 CFR §63.802(b)(4) and Table 3 of Subpart JJ)

3.B.13 For Emission Point AA-019, the permittee shall not exceed an emission rate of Particulate Matter 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.

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

3.B.14 For Emission Point AA-019, the permittee shall not discharge sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

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 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
11 Miss. Admin. Code Pt.2, R.1.4.A(1).	3.C.2 & 1.19	SO <sub>2</sub>	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions
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 of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (11 Miss. Admin. Code Pt.2, R.1.3. F(1).)

**D. Work Practice Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Limit/Standard
AA-008 AA-016 AA-018	40 CFR 63, Subpart JJ §63.803(a)	3.D.1	Work practice implementation plan
	40 CFR 63, Subpart JJ §63.803(b)	3.D.2	Operator training
	40 CFR 63, Subpart JJ §63.803(c)	3.D.3	Inspection and maintenance plan
	40 CFR 63, Subpart JJ §63.803(d)	3.D.4	Cleaning and washoff solvent accounting system
	40 CFR 63, Subpart JJ §63.803(e)	3.D.5	Chemical composition of cleaning and washoff solvents
	40 CFR 63, Subpart JJ §63.803(f)	3.D.6	Spray booth cleaning
	40 CFR 63, Subpart JJ §63.803(g)	3.D.7	Storage requirements
	40 CFR 63, Subpart JJ §63.803(h)	3.D.8	Application equipment requirements
	40 CFR 63, Subpart JJ §63.803(i)	3.D.9	Line cleaning
	40 CFR 63, Subpart JJ §63.803(j)	3.D.10	Gun cleaning
	40 CFR 63, Subpart JJ §63.803(k)	3.D.11	Washoff operations
	40 CFR 63, Subpart JJ §63.803(l)	3.D.12	Formulation assessment plan for finishing operations
AA-016	40 CFR 63, Subpart DDDDD, §63.7540(a)(10)(i)-(vi) and (12)	3.D.13	Initial and Subsequent Tune-ups
	40 CFR 63, Subpart DDDDD, §63.7510(e), §63.7575 and Item 4 of Table 3	3.D.14	One-time Energy Assessment

3.D.1 For Emission Points AA-008, AA-016, and AA-018, the permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and the plan shall address each of the work practice standards in Conditions 3.D.2 through 3.D.12 of this permit. This plan shall be available for inspection by the DEQ upon request.  
(Ref.: 40 CFR §63.803(a))

3.D.2 For Emission Points AA-008, AA-016, and AA-018, the permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations; use of manufacturing equipment; or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

- (a) A list of all current personnel by name and job description that are required to be trained;
- (b) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(Ref.: 40 CFR §63.803(b))

3.D.3 For Emission Points AA-008, AA-016, and AA-018, the permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

- (a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
- (b) An inspection schedule;
- (c) Methods for documenting the date and results of each inspection and any repairs that were made;
- (d) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

- (1) A first attempt at repair (e.g. tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
- (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(Ref.: 40 CFR §63.803(c))

3.D.4 For Emission Points AA-008, AA-016, and AA-018, the permittee shall develop an organic solvent accounting form to record:

- (a) The quantity and type of organic solvent used each month for washoff and cleaning;
- (b) The number of pieces washed off, and the reason for the washoff; and
- (c) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(Ref.: 40 CFR §63.803(d))

3.D.5 For Emission Points AA-008, AA-016, and AA-018, the permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ which are in concentrations subject to Material Safety Data Sheet (MSDS) reporting as required by the Occupational Safety and Health Administration (OSHA). A copy of Table 4 is contained in Appendix B of this permit.

(Ref.: 40 CFR §63.803(e))

3.D.6 For Emission Points AA-008, AA-016, and AA-018, the permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(Ref.: 40 CFR §63.803(f))

3.D.7 For Emission Points AA-008, AA-016, and AA-018, the permittee shall use normally closed containers for storing finishing, cleaning, gluing, and washoff materials.

(Ref.: 40 CFR §63.803(g))

3.D.8 For Emission Points AA-008, AA-016, and AA-018, the permittee shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.

(Ref.: 40 CFR §63.803(h))

3.D.9 For Emission Points AA-008, AA-016, and AA-018, the permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(Ref.: 40 CFR §63.803(i))

3.D.10 For Emission Points AA-008, AA-016, and AA-018, the permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(Ref.: 40 CFR §63.803(j))

3.D.11 For Emission Points AA-008, AA-016, and AA-018, the permittee shall control emissions from washoff operations by:

- (a) Using normally closed tanks for washoff; and
- (b) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(Ref.: 40 CFR §63.803(k))

3.D.12 For Emission Points AA-008, AA-016, and AA-018, the permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

- (a) Identifies VHAP from the list presented in Table 5 of Subpart JJ (see Appendix B of this permit) that are being used in finishing operations. A copy of Table 5 is contained in Appendix B of this permit.
- (b) Establishes a baseline level of usage by the permittee, for each VHAP identified in (a) above. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16.
- (c) Tracks the annual usage of each VHAP identified in (a) above that is present in amounts subject to MSDS reporting as required by OSHA.
- (d) If, after November 1998, the annual usage of the VHAP identified in (a) above exceeds its baseline level, then the permittee of the affected source shall provide a

written notification to the DEQ that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the permittee is not in compliance with other requirements for that VHAP:

- (1) The exceedance is no more than 15.0 percent above the baseline level;
  - (2) Usage of the VHAP is below the *de minimis* level presented in Table 5 of Subpart JJ for that VHAP.
  - (3) The permittee is in compliance with any other DEQ regulations or guidelines for the VHAP; or
  - (4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
- (e) If none of the above explanations are the reason for the increase, the permittee shall confer with DEQ to discuss the reason for the increase and whether there are practical and reasonable technology based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturer's operations, or other criteria mutually agreed upon by DEQ and the permittee. If there are no practical and reasonable solutions, the permittee need take no further action. If there are solutions, permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (f) If the permittee uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The permittee shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level in Table 6 for that chemical, then the permittee shall provide an explanation to DEQ that documents the reason for exceedance of the *de minimis* level. If the explanation is not one of those listed in Condition 3.D.12.(d)(1) through(4) the permittee shall follow the procedures established in Condition 3.D.12.(e).

(Ref.: 40 CFR §63.803(l))

- 3.D.13 For Emission Point AA-016 the permittee shall complete an initial tune-up in accordance with (a) through (f) below by January 31, 2016. Subsequent tune-ups shall also be in accordance with (a) through (f) below and shall be conducted every five years, with each

tune-up being completed no more than 61 months after the previous tune-up. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down, but the burner must be inspected once every 72 months

- (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);
- (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 ,an annual report containing the information listed below in (1) and (2).
  - (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 or process heater;
  - (2) A description of any corrective actions taken as a part of the tune-up

(Ref.: 40 CFR §63.7510(e), §63.7515(d), §63.7540(a)(10)(i)-(vi)and (12) and Table 3 of Subpart DDDDD)

- 3.D.14. For Emission Point AA-016 the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in §63.7575 by January 31, 2016. 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 §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 practices and provide recommendations for improvements consistent with the definition of energy management practices, 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; and
- (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 in Subpart DDDDD)

**E. Operation and Maintenance Requirements**

- 3.E.1 The permittee shall, at all times including periods of startup, shutdown, and malfunctions, operate and maintain Emission Points AA-008, AA-016, and AA-018 in a manner consistent with good air pollution control practices for minimizing emissions at least to the emission levels authorized herein.

(Ref.: 40 CFR §63.6(e) and §63.802(c))

## 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))
- 4.3 The permittee shall submit progress reports consistent with an applicable schedule of compliance and 11 Miss. Admin. Code Pt.2, R.6.2.C (8) semiannually, or at such other frequency as is specified in an applicable requirement or by the Permit Board. Such progress reports shall contain the following:
- (a) dates for achieving the activities, milestone(s), or compliance required in the schedule of compliance, and dates when such activities, milestone(s) or compliance were achieved; and
  - (b) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 4.4 Emission Point AA-016 is subject to and must comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD, by January 31, 2016.

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A (3)(b)(1)(i)-(vi).)
  - (g) Except as otherwise specified herein, 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.3 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.4 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A (3)(c)(2).) Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

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

**B. Specific Monitoring, Recordkeeping, and Reporting Requirements**

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirements
AA-008	VHAP	a) Calculate the average VHAP content for all finishing materials used at the facility, and/or b) Use compliant finishing materials	5.B.1	40 CFR §63.804(a)(1), (2), and (4)
AA-011 AA-013	VHAP	Use compliant contact adhesives	5.B.2	40 CFR §63.804(c)
AA-016 AA-018	VHAP	a) Calculate the average VHAP content for all finishing materials used at the facility, and/or b) Use compliant finishing materials	5.B.3	40 CFR §63.804(d)(1), (2), and (4)
AA-008 AA-016 AA-018	VHAP	Submit with the semiannual report: 1. a ) calculations for the coatings and thinners in the finishing operations <b>or</b> b) shall submit records that show the materials used are in compliance 2. certification that the strippable spray booth coatings are in compliance 3. certification that the work practice implementation plan if being followed	5.B.4 5.B.5 5.B.6	40 CFR §63.804(g)(1), (2), (7), and (8)
	Recordkeeping of calculations and quantity	Maintain records of the calculations from 5.B.1(a) and the quantity of coatings and thinners used.	5.B.9	40 CFR §63.806(c)
	Work practice implementation plan	Maintain the work practice implementation plan onsite.	5.B.10	40 CFR §63.806(e)
AA-008 AA-011 AA-013 AA-016 AA-018	Formaldehyde	a) Calculate the total formaldehyde emissions from all finishing materials and contact adhesives, and/or b) Demonstrate compliance by use of low formaldehyde coatings and contact adhesives	5.B.7	40 CFR §63.804(h)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirements
	Recordkeeping of VHAP, VOC and formaldehyde	Maintain records of the materials' product data sheet, VHAP and VOC and formaldehyde content.	5.B.8	40 CFR §63.806(b)
	Reporting	Submit a semiannual report.	5.B.11	40 CFR §63.806(h) and §63.807(c)
AA-016	Reporting	Submit a Notification of Compliance Status	5.B.12	40 CFR §63.7530(d)and(e) and §63.7545(e)(1),(6),and(8)
	Compliance Report	Submit the compliance report upon completion of each required tune-up.	5.B.13	40 CFR §63.7550(a),(b), and (c)(1) and Table 9 of Subpart DDDDD
	Recordkeeping	Keep a copy of each notification and report that was submitted.	5.B.14	40 CFR §63.7555(a)(1)
	Recordkeeping	Keep the records for two years onsite and three years offsite.	5.B.15	40 CFR §63.7560
AA-011 AA-012 AA-013 AA-014	CAM	Fulfill all other obligations in 40 CFR Parts 64.7 through 64.9 and shall submit semi-annual records of compliance with the CAM plan in 5.B.17	5.B.16 5.B.17	40 CFR 64.7 through 64.9

5.B.1 For Emission Point AA-008, the permittee shall comply with the applicable emission limits for finishing operations found in Condition 3.B.2 using any of the following methods:

- (a) Calculate the average VHAP content for all finishing materials used at the facility using the following equation, and maintain a value of E no greater than 1.0;

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

where:

E = average VHAP content of finishing materials (lb VHAP/lb solids);

M<sub>cn</sub> = mass of solids in finishing material (c) used monthly (lb solids/month);

C<sub>cn</sub> = VHAP content of finishing material (c) in lb VHAP/lb solids;

S<sub>n</sub> = VHAP content, expressed as a weight fraction, of any thinners added to the finishing materials participating in the averaging equation; and

W<sub>n</sub> = amount of S<sub>n</sub>, in pounds, added to the finishing materials during the monthly averaging period

- (b) Use compliant finishing materials according to the following:

- (i) demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
- (ii) demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made (i.e., not formulated on site) has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
- (iii) demonstrate that each washcoat, basecoat, and enamel that is formulated on site is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight.

(c) Use any combination of (a) and (b) listed above.  
(Ref.: 40 CFR §63.804(a)(1),(2), and (4))

5.B.2 For Emission Points AA-011 and AA-013, the permittee shall comply with the applicable emission limits for contact adhesives found in Condition 3.B.5 by using compliant contact adhesives with a VHAP content no greater than 1.0 lb VHAP/lb solids, as applied.

5.B.3 For Emission Points AA-016 and AA-018, the permittee shall comply with the applicable emission limits for finishing operations found in Condition 3.B.10 using any of the following methods:

- (a) Calculate the average VHAP content for all finishing materials used at the facility using the equation from Condition 5.B.1, and maintain a value of E no greater than 0.8;
- (b) Use compliant finishing materials according to the following:
  - (i) demonstrate that each sealer, and topcoat has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
  - (ii) demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made (i.e., not formulated on site) has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and
  - (iii) demonstrate that each washcoat, basecoat, and enamel that is formulated on site is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight.

(c) Use any combination of (a) and (b) listed above.  
(Ref.: 40 CFR §63.804(d)(1),(2), and (4))

5.B.4 For Emission Points AA-008, AA-016, and AA-018, the permittee shall demonstrate continuous compliance with the emission limitations established in Conditions 3.B.2 and 3.B.10 by doing one of the following:

- (a) If using the method contained in Conditions 5.B.1(a) and 5.B.3(a), the permittee shall submit the results of the averaging calculation for each month within the semiannual period and submitting a compliance certification with the semiannual report required in Condition 5.B.11. If the results indicate such, the certification shall state that the value of “E” from the equation in Condition 5.B.1(a) is no greater than 1.0 for Emission Point AA-008 or 0.8 for Emission Points AA-016 and AA-018.
- (b) If using the method contained in Conditions 5.B.1(b) and 5.B.3(b), the permittee shall use only compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required in Condition 5.B.11. The certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels and thinners have been used each day in the semiannual reporting period or should otherwise identify any periods of noncompliance and the reason(s) for the noncompliance.

(Ref.: 40 CFR §63.804(g)(1) and (2))

5.B.5 For Emission Points AA-008, AA-016, and AA-018, the permittee shall demonstrate continuous compliance with the emission limitations established in Conditions 3.B.3 and 3.B.10 by submitting a compliance certification with the semiannual report required in Condition 5.B.11. The certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period or should identify any day noncompliant materials were used. (Ref.: 40 CFR §63.804(g)(7))

5.B.6 For Emission Points AA-008, AA-016, and AA-018, the permittee shall demonstrate continuous compliance with the work practice standards in Conditions 3.D.1 through 3.D.12 by submitting a compliance certification with the semiannual report required in Condition 5.B.11. The certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented.

(Ref.: 40 CFR §63.804(g)(8))

5.B.7 For Emission Points AA-008, AA-011, AA-013, AA-016, and AA-018, the permittee shall comply with the formaldehyde emission limits in Conditions 3.B.4 and 3.B.12 using one of the following methods:

- (a) Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using the following equation, and maintain a value of  $F_{\text{total}}$  of no more than 400 pounds per rolling 12 month period

$$F_{\text{total}} = (C_{f1}V_{c1} + C_{f2}V_{c2} + \dots + C_{fn}V_{cn} + G_{f1}V_{g1} + G_{f2}V_{g2} + \dots + G_{fn}V_{gn})$$

Where:

$F_{\text{total}}$  = total formaldehyde emissions in each rolling 12 month period

$C_f$  = the formaldehyde content of a finishing material (c), in pounds of formaldehyde per gallon of coating (lb/gal)

$V_c$  = the volume of formaldehyde-containing finishing material (c), in gal

$G_f$  = the formaldehyde content of a contact adhesive (g), in pounds of formaldehyde per gallon of contact adhesive (lb/gal)

$V_g$  = the volume of formaldehyde-containing contact adhesive (g), in gal

- (b) Demonstrate compliance by use of coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives maintaining a certified product sheet for each coating and adhesive used, as required in Condition 5.B.8.

The permittee shall submit a compliance certification with the semiannual report required in Condition 5.B.11. This certification shall state that low-formaldehyde materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the corresponding reason(s) for noncompliance.  
(Ref.: 40 CFR §63.804(h))

5.B.8 For Emission Points AA-008, AA-011, AA-013, AA-016, and AA-018, the permittee shall maintain the following records:

- (a) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Section 3.B of this permit; and
- (b) The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Section 3.B of this permit; and
- (c) The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Section 3.B of this permit; and
- (d) The formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive submit to the emission limits in Section 3.B of this permit and chooses to comply with the 400 lb/yr limit on formaldehyde.

(Ref.: 40 CFR §63.806(b))

5.B.9 For Emission Points AA-008, AA-016, and AA-018, the permittee shall maintain copies of the averaging calculation from 5.B.1(a) for each month as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E.  
(Ref.: 40 CFR §63.806(c))



- 5.B.10 For Emission Points AA-008, AA-016, and AA-018, the permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- (a) Records demonstrating that the operator training program in Condition 3.D.2 is in place;
  - (b) Records collected in accordance with the inspection and maintenance plan in Condition 3.D.3;
  - (c) Records associated with the cleaning solvent accounting system in Condition 3.D.4;
  - (d) Records associated with the formulation assessment plan in Condition 3.D.12
  - (e) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (Ref.: 40 CFR §63.806(e))
- 5.B.11 For Emission Points AA-008, AA-011, AA-013, AA-016, and AA-018, the permittee shall submit a semiannual report in accordance with Condition 5.A.3 of this permit covering the previous 6 months of wood furniture manufacturing operations. The semiannual report shall include the information required by Conditions 5.B.3 through 5.B.7 of this permit and a statement of whether the affected source was in compliance or noncompliance, and, if in noncompliance, the measures taken to bring the affected source into compliance. The permittee shall maintain records of the compliance certifications submitted for each semiannual reporting period.(Ref.: 40 CFR §63.806(h);§63.807(c))
- 5.B.12 For Emission Point AA-016, the permittee shall submit a Notification of Compliance Status no later than April 1, 2016, including the following information and certifications of compliance listed in (a) through (d) below and signed by a responsible official.
- (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) A certification stating “This facility has met all applicable emission limits and work practice standards.”
  - (c) A certification stating “This facility complies with the required initial tune-up according to the procedures in §63.7540(a)(10)(i) through (vi).”
  - (d) A certification stating “This facility has had an energy assessment performed according to §63.7530(e).”
- (Ref.: 40 CFR §63.7530(d) and (e) and §63.7545(e)(1),(6),and (8))
- 5.B.13 Beginning January 31, 2016, for Emission Point AA-016, the permittee shall submit the information listed in (a) through (e) below in accordance with the annual compliance report required by Condition 4.2 of this permit upon completion of each required tune-up identified in Condition 3.D.13

- (a) Company and Facility name and address.
- (b) Process unit information.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) The total operating time during the reporting period.
- (e) Include the date of the most recent tune-up for Emission Point AA-016. Include the date of the most recent burner inspection if it was not performed at the required frequency and was delayed until the next scheduled or unscheduled unit shutdown.

(Ref.: 40 CFR §63.7550(a),(b), and (c)(1) and Table 9 of Subpart DDDDD)

- 5.B.14 For Emission Point AA-016, the permittee shall maintain and keep a copy of each notification and report that was submitted to comply with Subpart DDDDD and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

(Ref.: 40 CFR §63.7555(a)(1))

- 5.B.15 For Emission Point AA-016, the permittee shall retain the records required in Condition 5.B.12 for 5 years following the date of each recorded action in a form suitable and readily available for expeditious review. The permittee is required to keep the records onsite for a period of 2 years and then they may be kept offsite for the remainder of the time.

(Ref.: 40 CFR §63.7560)

- 5.B.16 For Emission Points AA-011, AA-012, AA-013, AA-014, the permittee is required to conduct the monitoring and fulfill all other obligations specified in 40 CFR Parts 64.7 through 64.9. In addition, the permittee shall submit semi-annual records of compliance with the CAM plan specified in 5.B.7 in accordance with 5.A.4 of this document.

- 5.B.17 The table below is the CAM plan for Emission Points AA-011, AA-012, AA-013 and AA-014:

I. Indicator	Visible Emissions	Baghouse Differential Pressure
Measurement Approach	A visual observation of emissions will be performed daily while the process is operating. When emissions are observed, a full method 9 will be performed.	Baghouse Differential Pressure is measured by a differential pressure gauge.
II. Indicator Range	An excursion is defined as the presence of any emissions. Excursions trigger an inspection, corrective action, and a reporting requirement within five (5) working days.	An excursion is defined as a differential pressure that is greater than 6.0 inches of water. If an excursion occurs, the process will be shut down and the control equipment inspected and repaired if necessary prior to continuing facility operations. Excursions trigger a reporting requirement within five (5) working days.
III. Performance Criteria	Measurements are being made at the emission point (Baghouse Exhaust).	Pressure taps are located at the baghouse inlet and outlet.
A. Data Representativeness		
B. Verification of Operational Status	NA	NA
C. QA/QC Practices and Criteria	An onsite person performing visual observations will be trained. MDEQ or equivalent trainer will certify VEE observer twice per year.	The equipment is inspected weekly. Bags are cleaned when baghouse differential pressure reaches 5.0 inches of water. Replacement bags are kept onsite. Bags and differential pressure gauges are replaced as needed.
D. Monitoring Frequency	Visual observations will be performed for six minutes each day. If emissions are visible, then an EPA Method 9 will be performed.	Baghouse Differential Pressure is monitored while the processes are operating.
E. Data Collection Procedure	Opacity observations, and if needed, EPA Method 9 (i.e., 3 six minute tests), will be recorded and kept in an Opacity Log.	Baghouse Differential Pressure is collected on a weekly basis.
F. Averaging period	Visual observation: 6 minute test EPA Method 9: 3 six minute tests	NA; Baghouse Differential Pressure is an instantaneous measurement.

**SECTION 6.      ALTERNATIVE OPERATING SCENARIOS**

None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

## APPENDIX A

### List of Abbreviations Used In this Permit

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.	Regulations for the Prevention of Air Pollution Emergency Episodes
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
NMVOC	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

# **APPENDIX B**

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR  
POLLUTANTS FROM WOOD FURNITURE MANUFACTURING  
OPERATIONS, 40 CFR SUBPART JJ- TABLES 2,3,4,5 AND 6**



# **APPENDIX C**

## **CAM PLAN**