STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Georgia Pacific Wood Products LLC, Taylorsville Plant
Highway 28 West
Taylorsville, Mississippi
Smith 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: February 14, 2011

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Modified: August 25, 2011, and AUG 2 1 2015
Expires: January ~~31, 2016~~

Permit No.: 2500-00002

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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 (a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and condition has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by MDEQ, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) MDEQ or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to MDEQ along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(6)(d).)

1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(5).)

1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.6.D(2).)

(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.6.D.)

(d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(8).)

1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.2.E.)

1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.C(2).)

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.I(1).)

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.I(2).)

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of MDEQ under that section;

(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.F(2).)

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.H.)

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a

violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.4.C(2)., R. 6.4.B., and R.6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

(a) the changes are not modifications under any provision of Title I of the Act;

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides MDEQ and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal

Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or

(2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;

(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

(f) any change in ownership of the stationary source."

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

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by

local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.G.)

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

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R.1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Studmill (130.0 TPH Capacity):

Emission Point	Description
AA-409	The Studmill Cyclone. A Fisher-Klosterman, Model XQ 120-30-2, ultra high efficiency cyclone collects woodwaste and controls particulate matter emissions (GP Ref. No. EP3).
AA-410	Shaker Screen Green Chip Bin with Cyclone collects green chips and controls particulate matter emissions (GP Ref. No. EP4).
AA-403	The Four Steam Heated Dry Kilns (GP Ref. No. 1, 2, 3, and 4),172 Mbf/charge for Kilns #1, and #2, 143 Mbf/charge for Kiln #3, and 86 Mbf/charge for Kiln #4.

Plywood Mill (278.0 TPH Capacity)

Emission Point	**Description**
AA-500	The 169 MMBtu/hr, Bark & Wood Residuals and Natural Gas Fired, E. Keller Company NB4523, Boiler No.1. The boiler is equipped with a Zurn Industries multiclone that collects fly ash and controls particulate matter emissions and a dry electrostatic precipitator for control of particulate matter emissions. (GP Ref. No. B1).
AA-700	The155 MMBtu/hr, Bark & Wood Residuals and Natural Gas Fired, E. Keller Company MKB, Boiler No.3. The boiler is equipped with a Zurn Industries multiclone that collects fly ash and a PPC Industries electrostatic precipitator for control of particulate matter emissions. (GP Ref. No. B3).
AA-404	The Veneer Drying Operation (Emission Point AA-404; GP Ref. No. M1), which includes the hot zone exhausts of Veneer Dryer No.1(22 sections), Veneer Dryer No.2 (20 sections), Veneer Dryer No. 3 (16 sections), and Veneer Dryer No. 4 (10 sections). Volatile organic compound emissions are controlled by a Regenerative Thermal Oxidizer equipped with three (3) natural gas fired, low NO_x burners, with a maximum rating of four (4) MMBtu/hour each (GP Ref. No. RTO-M1).
AA-405	The Veneer Dryer Cooling Vents which include Veneer Dryer No.1 (3 vents), Veneer Dryer No. 2 (3 vents). Veneer Dryer No. 3 (3 vents), and Veneer Dryer No. 4 (2 vents). Ambient air is used to cool the hot veneer prior to exiting the veneer dryers and exhausts to the atmosphere through these vents.
AA-301	The Glue Line Lay Up Operation with 12 exhaust stacks (GP Ref. No. M2).
AA-302	The Plywood Finishing Operation where some plywood is oil coated and edge sealed at a spray booth (GP Ref. No. M3).
AA-303	The Glue Line Hog, Veneer Pluggers, Dry Core Saw, Skinner Saw, Dry Hog, 99 Inch Trim Saw, and Studmilling Operations. A Fisher-Klosterman, Inc. Model XQ 120-45-2 Dual Cyclone collects woodwaste and controls particulate matter emissions (GP Ref. No. EP1).
AA-304	The Particleboard Sander Operation Relay equipped with a Fisher-Klosterman, Inc. Model XQ 030-9 Cyclone that collects sanderdust and controls particulate matter emissions (GP Ref. No. EP7).
AA-305	The Specialty Saw, Tongue and Groove, and Old Tongue and Groove Operations equipped with a MAC Model 120 WP-212 baghouse that collects woodwaste and controls particulate matter emissions (GP

Emission Point	Description
	Ref. No. EP8).
AA-306	The Top Sanders Operation equipped with a Pneumafil Model 11.5-312-12 baghouse collects sanderdust and controls particulate matter emissions (GP Ref. No. EP9).
AA-307	The Bottom Sanders Operation equipped with a Pneumafil Model 11.5-312-12 baghouse that collects sanderdust and controls particulate matter emissions (GP Ref. No. EP11).
AA-310	Fugitive emissions from the Debarking Operation which includes two debarkers, 120 linear feet/ minute capacity. (GP Ref. No. FS2).
AA-315	The Plywood Press Operation with four presses (GP Ref. No. FS7).
AA-319	Log Heating Vats (GP Ref. No. FS12).
AA-320	The 182 Horse Power Emergency Diesel Fire Pump (GP Ref. No. EP13)
AA-321	The Shaker Screen Green Chip Operation equipped with a cyclone collects green chips and controls particulate matter emissions (GP Ref. No. EP14).
AA-800	The Main Manufacturing Building containing the following emission sources: AA-314, the Glueline Operation (GP Ref. No. FS6) and AA-316, the Plywood Storage Operation (GP Ref. No. FS8).
AA-322	100 Hp Diesel-fired log loader (rail mounted)
AA-323	145 Hp Diesel-fired log loader (rail mounted)

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

Studmill:

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-409 AA-410 AA-403	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.1	PM/PM_{10}	$E = 4.1\ p^{0.67}$, not to exceed 93.3 lbs/hr and 408.7 TPY
AA-409	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). Construction Permit issued October 22, 1999.	3.B.1 3.B.2	PM/PM_{10}	3.37 lbs/hr, 14.74 TPY
AA-403	11 Miss. Admin. Code Pt. 2, R. 1.8.A. and 40 CFR Part 63, Subpart DDDD – National Emission Standards for	3.B.3	HAP	Applicability (40 CFR 63.2231)

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	Hazardous Air Pollutants for Plywood and Composite Wood Products	3.B.4	HAP	Exemption from further requirements (40 CFR 63.2252)

3.B.1 For Emission Points AA-409, AA-410, and AA-403, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour, from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. For purposes of this permit, the process weight input rate for the studmill (p) shall not exceed 106 Tons Per Hour. This is based on the reported total input of log cores at the studmill facility.

Conveyor discharge of course 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.2 For Emission Point AA-409, the permittee is limited by the PM/PM_{10} emission limits contained in Table B as established in the Construction Permit issued October 22, 1999.

3.B.3 For Emission Point AA-403, the permittee is subject to and shall comply with the applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (40 CFR Part 63, Subpart DDDD) and applicable General Provisions (40 CFR Part 63, Subpart A). A copy of the National Emission Standards for Plywood and Composite Wood Products is provided as supplemental information in Appendix C of the federally enforceable permit herein. (Ref.: 40 CFR 63.2231)

3.B.4 For Emission Point AA-403, the permittee is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of 40 CFR Part 63 Subpart DDDD or any other requirements in 40 CFR Part 63 Subpart A, except for the initial notification requirements in 40 CFR 63.9(b). (Ref.: 40 CFR 63.2252)

Plywood Mill:

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-500	Operating Permit issued August 8, 1995, modified February 27, 1996, and January 2, 2001. 11 Miss. Admin. Code Pt. 2, R. 1.3.D(2)	3.B.7	PM	0.30 grains per dry standard cubic foot
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(3)	3.B.6	SO_2	4.8 lb/MMBtu
AA-700	Operating Permit issued August 8, 1995, modified February 27, 1996, and January 2, 2001. 11 Miss. Admin. Code Pt. 2, R. 1.3.D(2)	3.B.7	PM	0.30 grains per dry standard cubic foot
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.6	SO_2	4.8 lb/MMBtu
AA-500 AA-700	Operating Permit issued August 8, 1995, modified February 27, 1996, and January 2, 2001.	3.B.16	Fuel Restriction	Bark & Wood Residuals (as defined in application), Natural Gas
AA-404	Construction Permit issued January 21, 1998, and modified June 29, 1998, and November 16, 1998.	3.B.8	VOC (as carbon)	Minimum destruction efficiency of 90%
	11 Miss. Admin. Code Pt. 2, R. 1.8.A. and 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products	3.B.9	Total HAP	Applicability (40 CFR 63.2231)
		3.B.10	Total HAP	Compliance Options and Operating Requirements (40 CFR 63.2240)
		3.B.11	Total HAP	General Compliance Requirements (40 CFR 63.2250)
AA-404 AA-405 AA-301 AA-302 AA-303 AA-304 AA-305 AA-306 AA-307 AA-321 AA-315 AA-319	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.12	PM	$E = 4.1\ p^{0.67}$ not to exceed 178 lbs/hr and 779.6 TPY
AA-305	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). Operating Permit issued November 18, 1986 and modified on February 10, 1987, and March 22, 1998.	3.B.13	PM/PM_{10}	4.0 lbs/hr, 10.0 TPY

AA-320	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.B.14	PM	0.6 lbs/MMBtu
AA-320	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.15	SO_2	4.8 lbs/MMBtu
AA-500 AA-700	NESHAP, Subpart DDDDD 40 CFR 63.7480-7495	3.B.5	Emission and Operating Requirements	General applicability
	NESHAP, Subpart DDDDD 40 CFR 63.7500(a) and (f)	3.B.17	General Compliance	Comply with emission limits and work practice standards
	NESHAP, Subpart DDDDD 40 CFR 63.7500(a) and Table 2.1 and 2.13	3.B.18	HCl	2.2E-02 lb/MMBtu of heat input
			Hg	5.7E-06 lb/MMBtu of heat input
			CO (or CEMS)	CO (or CEMS) is limited to 2,800 ppm by volume on a dry basis corrected to 3 percent oxygen using a 3-run average (or EPA proposed amendment of 3,500 ppm when final)
			Filterable PM (or TSM)	Filterable PM (or TSM) is limited to 4.4E-01 lb/MMBtu of heat input, by collecting a minimum of 1 dscm per run.

3.B.5 Emission Points AA-500 and AA-700 are subject to and shall comply with all applicable requirements, limitations, and any subsequent revisions of the NESHAP, Subpart DDDDD - Standards for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. (Ref.: 40 CFR 63.7480-7495)

Emission Points AA-500 and AA-700 are existing large boilers that are in the "hybrid suspension grate units designed to burn biomass/bio-based solid" fuel subcategory as listed in 40 CFR 63.7499(h) and as defined in 63.7575.

For Emission Points AA-500, AA-700, as existing boilers, the permittee must comply with the requirements of 40 CFR 63, Subpart DDDDD by no later than January 31, 2017, as specified in the Letter of Extension of Compliance Date issued on April 22, 2014. A copy of the letter is attached as Appendix G of this permit. (Ref.: 40 CFR 63.7495(b))

3.B.6 For Emission Points AA-500 and AA-700, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))

3.B.7 For Emission Points AA-500 and AA-700, the maximum discharge of particulate matter shall not exceed 0.30 grains per standard dry cubic foot for fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil pus bark, or spent wood, or water treatment by-products sludge, to produce steam or heat water or any other heat transfer medium through indirect means. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(2))

3.B.8 For Emission Point AA-404, the permittee is limited by the VOC (as carbon) minimum destruction efficiency of 90% emission limitation established in the Construction Permit issued January 21, 1998, and modified November 16, 1998.

3.B.9 For Emission Point AA-404, the permittee is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (40 CFR Part 63, Subpart DDDD) and the General Provisions (40 CFR Part 63, Subpart A). A copy of the National Emission Standards for Plywood and Composite Wood Products is provided as supplemental information in Appendix C of the federally enforceable permit herein. (Ref.: 40 CFR 63.2231)

3.B.10 For Emission Point AA-404, the permittee shall be in compliance with the following compliance option(s) and operating requirement(s):

(a) The permittee shall comply with one or more of the add-on control systems compliance options as contained in Table 1B to Subpart DDDD.

(Ref.: 40 CFR 63.2240 and Table 1B)

(b) The permittee shall maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test as required by Table 2 to Subpart DDDD.

(Ref.: 40 CFR 63.2240 and Table 2)

3.B.11 For Emission Point AA-404, the permittee shall be in compliance with the following general compliance requirements:

(a) The permittee shall be in compliance with all applicable compliance options, operating requirements, and the work practice requirements of 40 CFR 62.2250 at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CFR 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

(b) The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(3)(1)(i).

(c) The permittee shall develop a written SSMP according to the provisions in 40 CFR 63.6(e)(3).

(Ref.: 40 CFR 63.2250)

3.B.12 For Emission Points AA-404, AA-405, AA-301, AA-302, AA-303, AA-304, AA-305, AA-306, AA-307, AA-321, AA-315, and AA-319, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour, from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. For purposes of this permit, the process weight input rate for the plywood mill (p) shall not exceed 278 Tons Per Hour. The input rate is based on the total input of logs and resin used at the plywood mill.

Conveyor discharge of course 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.13 For Emission Point AA-305, the permittee is limited by the Operating Permit issued on November 11, 1986, and modified on February 10, 1987, and March 22, 1988.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).)

3.B.14 For Emission Point AA-320, the maximum permissible particulate matter emissions from 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.B.15 For Emission Point AA-320, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1))

3.B.16 For Emission Points AA-500 and AA-700, the permittee is authorized to burn Bark and Wood Residuals (as defined in application) and Natural Gas as fuels (Operating Permit issued August 8, 1995, modified February 27, 1996, and January 2, 2001.)

3.B.17 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, the permittee must meet each emission limit and work practice standard in Tables 2 and 3 of NESHAP Subpart DDDDD that applies to the unit. The permittee must also meet each operating limit in Table 4 of Subpart DDDDD that applies to the unit.

At all times, you must operate and maintain the affected unit, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

These standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with Table 3 of Subpart DDDDD. (Ref.: 40 CFR 63.7500(a) and (f))

3.B.18 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, existing hybrid suspension grate units designed to burn biomass as fuel, the permittee must not exceed the following emission limits or alternative output-based limits, except during startup and shutdown:

Table 2.1 (for all units designed to burn solid fuel)

HCl is limited to 2.2E-02 lb per MMBtu of heat input. For M26A, collect a minimum of 1 dscm per run, and for M26, collect a minimum of 120 liters per run.

Mercury is limited to 5.7E-06 lb per MMBtu of heat input. For M29, collect a minimum of 3 dscm per run; for M30A or M30B, collect a minimum sample as specified in the method; and for ASTM D6784, collect a minimum of 3 dscm.

Table 2.13 (hybrid suspension grate units designed to burn biomass/bio-based solid)

CO (or CEMS) is limited to 2,800 ppm by volume on a dry basis corrected to 3 percent oxygen using a 3-run average. EPA proposed amendments to Subpart DDDDD on January 21, 2015, that would revise the CO limit for such boilers. Once these amendments become final, the emission limit will be 3,500 ppm by volume on a dry basis corrected to 3 percent oxygen using a 3-run average.

Filterable PM (or TSM) is limited to 4.4E-01 lb/MMBtu of heat input by collecting a minimum of 1 dscm per run.

(Ref.: 40 CFR 63.7500(a) and Table 2 of Subpart DDDDD)

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_2	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	$E = 4.1\ p^{0.67}$

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a).)

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour, from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

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 course 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).)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-404, and Miscellaneous Coating Operations	11 Miss. Admin. Code Pt. 2, R. 1.8.A. and 40 CFR 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products	3.D.1, 3.D.2	Work Practice Requirements	40 CFR 63.2241
AA-320	Beginning May 3, 2013 40 CFR 63, Subpart ZZZZ- National Emission Standards for Stationary Reciprocating Internal Combustion Engines	3.D.3, 3.D.4, and 3.D.5	Work Practice Requirements	40 CFR 63.6603(a) and Table 2d, 40 CFR 63.6640(f)(1) thru (4), and 40 CFR 63.6625(h)
AA-500 and AA-700	NESHAP, Subpart DDDDD 40 CFR 63.7495(b) and 7500(a)(1) and Table 3.3-4	3.D.6	Work Practice Requirements	Work practices provided in Table 3 of Subpart DDDDD (e.g., tune-up once every 5 years and one-time energy assessment).
	NESHAP, Subpart DDDDD 40 CFR 63.7500(a) and Table 3.5-6	3.D.7	Work Practice Requirements	Operate all CMS during startup and shutdown.
	40 CFR 63.7500(a)(1) and Table 3	3.D.8	Work Practice Requirements	Energy assessment
	40 CFR 63.7540(a)(10)	3.D.9	Work Practice Requirements	Tune up

3.D.1 For Emission Point AA-404, the permittee shall minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts). (Ref.: 40 CFR 63.2241(a) and Table 3)

3.D.2 For Group 1 Miscellaneous Coating Operations, the permittee shall use non-HAP coatings (below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds). (Ref.: 40 CFR 63.2241)

3.D.3 For Emission Point AA-320, the permittee is an affected source as an existing stationary

compression ignition RICE located at an area source of HAP emissions. This unit must comply with the following requirements, except during periods of startup:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first (see Table 2d footnote 1 for additional options to this requirement);

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform management practice requirements on the schedule required in Table 2d of Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk, the management practice can be delayed until the emergency is over or the unacceptable risk has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. Sources must report any failure to perform the management practice on the schedule required and the basis under which the risk was deemed unacceptable.

(d) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform management practice requirements on the schedule required in Tabole 2d of Subpart ZZZZ, or if performing the management practiceo n the required schedule would otherwise pose an unacceptable risk, the management practice can be delayed until the emergency is over or the unacceptable ris has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. Sources must report any failure to perform the management practice on the schedule required and the basis under which the risk deemed unacceptable.

(Ref.: 40 CFR 63.6602 and Table 2c, Subpart ZZZZ)

3.D.4 For Emission Point AA-320, the existing emergency stationary RICE must comply with the following requirements:

(a) any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for up to 50 hours per hear is prohibited;

(b) There is no limit on emergency operation time;

(c) Maintenance and readiness testing is limited to 100 hours per year and must be recommended by government, the manufacturer, the vendor, or the insurance company associated with the engine;

(d) Non-emergency operation of up to 50 hours per year is permitted, but those 50hours are to be counted toward the 100 hour maintenance limit. The 50 hours

cannot be used for peak shaving or commercial sale, but may use up to 15 hours in demand response program as allowed in §63.6640(f)(4)

(Ref.: 40 CFR 63.6640(f)(1) thru (4))

3.D.5 During periods of startup, the permittee must minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. (Ref.: 40 CFR 63.6625(h))

3.D.6 For Emission Points AA-500, AA-700, the permittee is required to meet the applicable work practice standards found in Table 3 of Subpart DDDDD. A boiler with heat input capacity of 10 million Btu per hour or greater and equipped with an oxygen trim system must conduct a tune-up of the boiler once every 5 years as specified in §63.7540 and described in Condition 3.D.9, and must conduct a one-time energy assessment as described in Condition 3.D.8. (Ref.: 40 CFR 63.7500(a)(1) and Item 3 of Table 3)

3.D.7 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, the permittee must operate all CMS during startup. For startup of a unit, the permittee must use natural gas.

If the permittee starts firing biomass/bio-based solids, the permittee must vent emissions to the main stack(s) and engage all of the applicable control devices. Startup ends when steam or heat is supplied for any purpose.

For Emission Points AA-500 and AA-700, the permittee must operate all CMS during shutdown. While firing biomass/bio-based solids during shutdown, the permittee must vent emissions to the main stack(s) and operate all applicable control devices.

(Ref.: 40 CFR 63.7500(a) and Items 5 and 6 of Table 3))

3.D.8 For Emission Points AA-500 and AA-700, the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in §63.7575 by January 31, 2017. An energy assessment that has been competed 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. If the permittee operates under an energy management program developed according to Energy Star guidelines for energy management or compatible with ISO 50001 for at least one year between January 1, 2008 and January 31, 2017 the permittee satisfies the one time 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 system.

(b) An evaluation of operating characteristics of the boiler 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 which are under the control of the boiler 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 permittee'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 permittee's control.

(g) A list of the energy savings potential of the energy conservation measures identified.

(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 63.7500(a)(1) and Item 4 of Table 3)

3.D.9 For Emission Points AA-500 and AA-700, the permittee shall complete an initial tune-up in accordance with (a) through (f) below by January 31, 2017. The subsequent required tune-ups identified below shall also be in accordance with (a) through (f) below.

Beginning January 31, 2017, the subsequent tune-ups for Emission Point AA-500 and AA-700, existing boilers equipped with a continuous oxygen trim system, shall be conducted every 5 years, with each tune-up being completed no more than 61 months after the previous one. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down.

(i) 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). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(j) 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;

(k) 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). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

(l) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject;

(m) 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

(n) Maintain on-site and submit, if requested by MDEQ, an annual report containing the information in paragraphs (1) through (3) below,

(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; and

(3) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

(Ref.: 40 CFR 63.7540(a)(10) and 63.7515(d))

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 is subject to and shall comply with the applicable requirements of 40 CFR Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products. The permittee shall comply with the requirements of Subpart DDDD as specified in Conditions 3.B.3, 3.B.4, 3.B.9 through 3.B.12, 3.D.1 and 3.D.2 of this permit no later than the applicable compliance date. (Ref.: 40 CFR 63.2233)

4.4 The permittee is subject to and shall comply with the applicable requirements of 40 CFR ZZZZ – National Emission Standard for Hazardous Air Pollutants for Reciprocating Internal Combustion Engine (RICE). The permittee shall comply with the requirements of Subpart ZZZZ as specified in Conditions 3.D.3, 3.D.4, and 5.C.13 through 5.C.15 of this permit no later than May 3, 2013. (Ref.: 40 CFR 63.6595(a)(1))

4.5 Emission Points AA-500 and AA-700 – are subject to the National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. The permittee shall comply with all applicable requirements of Subpart DDDDD by not later than January 31, 2017, as specified in the Letter of Extension of Compliance Date issued on April 22, 2014. (Ref.: 40 CFR 63.7495(b))

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).)

5.A.3 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.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Studmill:

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-403	Raw Material Input	The permittee shall monitor and record the raw material input (log cores) to the process on a daily basis.	5.B.1	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-410	Visible Emissions	The permittee shall perform weekly visible emissions evaluations	5.B.2	For determination of compliance with 11 Miss. Admin. Code Pt. 2, R. 1.3.B.
AA-409	Visible Emissions	The permittee shall perform weekly visible emissions evaluations	5.B.2	For determination of compliance with 11 Miss. Admin. Code Pt. 2, R. 1.3.B.
	PM	The permittee shall perform biennial stack testing in accordance with EPA Reference Method 1-5	5.B.3	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).

5.B.1 For Emission Point AA-403, when operating the permittee shall monitor and record the raw material input (log cores) to the processes on a daily basis excluding weekends and holidays. Weekend and holiday input shall be recorded on the following working day. The permittee shall submit a summary report of the required monitoring in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.2 For Emission Points AA-409 and AA-410, when operating the permittee shall perform a visible observation of the cyclone's exhaust on a weekly basis. The date and time of each observation shall be recorded in a log. If any visible emissions are detected, the permittee shall perform a visual emissions evaluation (EPA Reference Method 9) and then determine and record whether or not the unit is functioning properly. If the unit is not operating properly, appropriate corrective action shall be taken and the permittee shall record the cause, duration, and corrective and/or the preventive actions taken or planned. A summary report of these records shall be summarized and reported in accordance with 5.A.4.

If conditions are such that opacity readings cannot be taken using observations or Method 9, the permittee shall note these conditions in the log and provide an explanation of why it was not possible to perform opacity readings/observations. Possible causes such as, but not limited to, steam plume interference, plume intermingling, and adverse weather conditions are examples in which observations or Method 9 cannot be performed.

The permittee shall perform weekly inspections of the pollution control equipment when operating. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. Records of the weekly inspections and any maintenance work performed shall be kept in log form and made available for review upon request during any inspection visit by Office personnel. A summary report of the weekly inspections and maintenance work shall be submitted in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

5.B.3 For Emission Point AA-409, when operating the permittee shall perform stack testing in accordance with EPA Reference Methods 1-5 on the schedule established in this condition, to demonstrate compliance with the permitted emissions limitations for particulate matter. The permittee shall demonstrate compliance and submit the stack test report by March 1, 2001, and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the source at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of the a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

Plywood Mill:

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-500 and AA-700	Fuel Usage	The permittee shall keep records of all fuels burned.	5.B.4	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	Stack Testing Requirements - PM/PM_{10}, SO_2, NO_X, CO, and Opacity	The permittee shall perform biennial stack testing	5.B.6	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
	Opacity	Install, calibrate, maintain, and operate a CMS to measure and record opacity.	5.B.7	40 CFR 60.45(a) & (c)(3)
	Opacity	Maintain records of excess opacity emissions (6-minute period during which the average opacity exceeds 20%, except that	5.B.8	40 CFR 60.45(g) & (l)

		one 6-minute average per hour of up to 27% opacity need not be reported).		
	O&M Plan	Maintain an O&M Plan for the ESP (control device).	5.B.9	11 Miss. Admin. Code Pt. 2, R.6.3.A(3).
	O_2	Monitor and record the percent of O_2 (on a dry basis) utilizing the O_2 monitor prior to the ESP.	5.B.10	11 Miss. Admin. Code Pt. 2, R.6.3.A(3).
	O_2	Calculate and record the 12-hour average O_2 concentrations for the two consecutive periods of each operating day.	5.B.11	11 Miss. Admin. Code Pt. 2, R.6.3.A(3).
	Recordkeeping	Maintain records	5.B.5	40 CFR 63.7555
	Performance Tests for HCl, Mercury, and Filterable PM (or TSM)	Performance testing	5.B.12	40 CFR 63.7515(a) and 7520(a)-(f)
	CO	Monitoring	5.B.13	40 CFR 63.7525(a)(1-7)
	Monitoring Requirements	Monitor and collect data	5.B.14	40 CFR 63.7535(a)-(d)
	Monitoring Requirements	Continuous compliance	5.B.15	40 CFR 63.7540(a)(1-19)
AA-404	VOC	The permittee shall perform biennial stack testing	5.B.16	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
		Continuous Compliance Requirements	5.B.17	40 CFR 63.2271
		Notifications and Records	5.B.18 5.B.19	40 CFR 63.2280 40 CFR 63.2282
AA-404, AA-405, AA-301, AA-302, AA-303, AA-304, AA-305, AA-306, AA-307, AA-308, AA-321 AA-315, and AA-319	Process Input	The permittee shall monitor and record the raw material input (logs and resin) to the processes on a daily basis	5.B.20	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-305	PM	The permittee shall perform biennial stack testing	5.B.21	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-306, AA-307	PM	The permittee shall perform rotating biennial stack test	5.B.22	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).
AA-305, AA-306, and AA-307	Opacity	The permittee shall perform weekly visible emissions	5.B.23	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1).

		evaluations		
AA-303, AA-304, and AA-321	Opacity	The permittee shall perform weekly visible emissions evaluations	5.B.24	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1).
AA-500 and AA-700	Emission Requirements	Demonstrate compliance with any of the applicable emission limits in Tables 2 of 40 CFR 63, Subpart DDDDD by conducting performance tests, conducting a fuel analysis for each type of fuel burned, establishing operating limits, and conducting CMS performance evaluations.	5.B.25	NESHAP, Subpart DDDDD 40 CFR 63.7510(a)(1-4)

5.B.4 For Emission Points AA-500 and AA-700, when operating the permittee shall keep a record of the combined total of all fuels combusted. These records shall consist of fuel type, quantity, sulfur content (% by weight) and the heating value (Btu/gal, Btu/lb, or Btu/scf), on a monthly basis and consecutive 12 month basis. These records shall be summarized and reported in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.5 For Emission Points AA-500 and AA-700, the permittee must keep records in accordance with the applicable sections of §63.7555. This includes a copy of each notification and report submitted to comply with 40 CFR 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted and records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations. (Ref.: 40 CFR 63.7555))

5.B.6 For Emission Points AA-500 and AA-700, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. The permittee shall demonstrate compliance with the PM/PM_{10} (filterable only), SO_2, NO_X, CO, and Opacity limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5/201 and 201a, 6, 16, 7, 10, and 9), or an otherwise approved equivalent method. The permittee shall determine the maximum fuel-firing rate and record the oxygen concentration in the stack during testing.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

5.B.7 For Emission Points AA-500 and AA-700, the permittee shall install, calibrate, maintain and operate a CMS to measure and record the opacity of gases discharged into the atmosphere from the boilers. The span value for the CMS measuring the opacity of emissions shall be 80, 90, or 100 percent. (Ref.: 40 CFR 60.45(c)(3))

5.B.8 For Emission Points AA-500 and AA-700, the permittee shall maintain records of any occurrence of excess opacity emissions. Excess emissions shall be defined as any 6-minute period during which the average opacity of emissions exceeds 20%, except that one 6-minute average per hour of up to 27% opacity need not be reported. (Ref.: 40 CFR 60.45(g) and (l))

5.B.9 For Emission Points AA-500 and AA-700, the permittee shall maintain an O&M Plan for the ESP (control device). The O&M Plan should be maintained on-site in accordance with Condition 5.A.3. The plan should include, but is not limited to, the following information:

(a) Operational Checklist (i.e., fields energized, minimum voltage level);

(b) Operational Procedures;

(c) Maintenance Schedules and Maintenance Activity Performed;

The permittee shall maintain records of any operational and/or maintenance activities associated with the ESP's O&M Plan, and all records shall be made available upon request by MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

5.B.10 For Emission Points AA-500 and AA-700, the permittee shall monitor and record the percent of O_2 (on a dry basis) from the gases discharged from the power boiler prior to the ESP. The O_2 monitor shall be maintained and calibrated in accordance with the manufacturer specifications. Records should be maintained on-site in accordance with Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

5.B.11 For Emission Points AA-500 and AA-700, the permittee shall calculate and record the 12-hour average O_2 concentrations from each boiler for the two (2) consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate twelve contiguous 1-hour average O_2 concentrations. Use this data to ensure proper boiler operation. Maintain records of O_2 monitoring, the daily 12-hour average O_2 concentrations, all O_2 monitor maintenance and calibration, and any instances of corrective action taken to ensure proper boiler operation. Records should be maintained on-site in accordance with Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

5.B.12 For Emission Points AA-500 and AA-700, the permittee must conduct all applicable performance tests for HCl, Mercury, and Filterable PM (or TSM) according to the site-specific test plan required by §63.7520(a) and according to §63.7520 on an annual basis, except as specified in 40 CFR 63.7515(b)-(e), (g), and (h). Annual performance tests must

be completed no more than 13 months after the previous performance test, except as specified in 40 CFR 63.7515(b)-(e), (g), and (h). (Ref.: 40 CFR 63.7515(a) and 7520(a)-(f))

5.B.13 For Emission Points AA-500 and AA-700, the permittee must install, operate, and maintain an oxygen analyzer system, as defined in §63.7575, or install, certify, operate and maintain continuous emission monitoring systems for CO and oxygen according to the procedures below:

(a) Install the CO CEMS and oxygen analyzer by January 31, 2017. The CO and oxygen levels shall be monitored at the same location at the outlet of the boiler or process heater.

(b) To demonstrate compliance with the applicable alternative CO CEMS emission standard listed in Table 2, install, certify, operate, and maintain a CO CEMS and an oxygen analyzer according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B, the site-specific monitoring plan developed according to §63.7505(d), and the requirements in §63.7540(a)(8). Any boiler that has a CO CEMS that is compliant with Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B, a site-specific monitoring plan developed according to §63.7505(d), and the requirements in §63.7540(a)(8) must use the CO CEMS to comply with the applicable alternative CO CEMS emission standard listed in Table 2.

(1) Conduct a performance evaluation of each CO CEMS according to the requirements in §63.8(e) and according to Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B.

(2) During each relative accuracy test run of the CO CEMS, collect emission data for CO concurrently (or within a 30- to 60-minute period) by both the CO CEMS and by Method 10, 10A, or 10B at 40 CFR part 60, appendix A-4. The relative accuracy testing must be at representative operating conditions.

(3) Follow the quality assurance procedures (e.g., quarterly accuracy determinations and daily calibration drift tests) of Procedure 1 of appendix F to part 60. The measurement span value of the CO CEMS must be two times the applicable CO emission limit, expressed as a concentration.

(4) Any CO CEMS that does not comply with §63.7525(a) cannot be used to meet any requirement in this subpart to demonstrate compliance with a CO emission limit listed in Table 2.

(5) For an existing unit, complete the initial performance evaluation no later than July 29, 2017, or if the unit becomes in compliance with Subpart DDDDD before the January 31, 2017 compliance date, the performance evaluation will be due 180 days from that date compliance is reached.

(c) Complete a minimum of one cycle of CO and oxygen CEMS operation (sampling, analyzing, and data recording) for each successive 15-minute period. Collect CO and oxygen data concurrently. Collect at least four CO and oxygen CEMS data values representing the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed.

(d) Reduce the CO CEMS data as specified in §63.8(g)(2).

(e) Calculate one-hour arithmetic averages, corrected to 3 percent oxygen from each hour of CO CEMS data in parts per million CO concentration. The one-hour arithmetic averages required shall be used to calculate the 30-day or 10-day rolling average emissions. Use Equation 19-19 in section 12.4.1 of Method 19 of 40 CFR part 60, appendix A-7 for calculating the average CO concentration from the hourly values.

(f) For purposes of collecting CO data, operate the CO CEMS as specified in §63.7535(b). Use all the data collected during all periods in calculating data averages and assessing compliance, except that you must exclude certain data as specified in §63.7535(c). Periods when CO data are unavailable may constitute monitoring deviations as specified in §63.7535(d).

(g) Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7.

(Ref.: 40 CFR 63.7525(a)(1-7))

5.B.14 For Emission Points AA-500 and AA-700, the permittee must monitor and collect data according to §63.7535 and the site-specific monitoring plan required by §63.7505(d). (Ref.: 40 CFR 63.7535(a)-(d))

5.B.15 For Emission Points AA-500 and AA-700, the permittee must demonstrate continuous compliance with each emission limit in Table 2, the work practice standards in Table 3, and the operating limits in Table 4 of 40 CFR 63, Subpart DDDDD that applies to you according to the methods specified in Table 8 and §63.7540(a)(1) through (19). (Ref.: 40 CFR 63.7540(a)(1-19))

5.B.16 For Emission Point AA-404, when operating the permittee shall demonstrate compliance with the destruction efficiency requirement for the captured volatile organic compounds (VOC) by stack testing in accordance with EPA Test Method 25A and submittal of the stack test report by January 17, 2001, and biennially thereafter. For the purpose of compliance demonstration, the permittee shall operate the four (4) veneer dryers simultaneously and at their maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved.

Testing must be performed to determine emission levels for VOC's entering and leaving the pollution control device. Modifications to Method 25A will be allowed to accommodate moisture levels in the emission stream; however, modifications to Method 25A and/or alternative test methods must be submitted for approval by the U.S. Environmental Protection Agency (EPA).

The permittee shall submit a written test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of the a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.17 For Emission Point AA-404, the permittee shall:

(a) Demonstrate continuous compliance with applicable compliance options, operating requirements and work practice requirements according to the methods specified in Tables 7 and 8 of 40 CFR Part 63 Subpart DDDD.

(b) Report each instance in which each applicable compliance option, operating requirement, and work practice requirement in Tables 7 and 8 of 40 CFR Part 63 Subpart DDDD was not met. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (b)(1) and (2) below. These instances are deviations from the compliance options, operating requirements, and work practice requirements. These deviations must be reported according to the requirements in §63.2281.

(1) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the EPA Administrator's satisfaction that they were operating in accordance with §63.6(e)(1). The EPA Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in §63.6(e).

(2) Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if you demonstrate to the EPA Administrator's satisfaction that you were operating in accordance with the approved routine control device maintenance exemption.

(Ref.: 40 CFR 63.2271)

5.B.18 For Emission PointAA-404, the permittee shall:

(a) Submit all of the required notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h).

(b) Submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in §63.7(b)(1).

(c) If using the emissions averaging compliance option in §63.2240(c), the permittee must submit an Emissions Averaging Plan to the EPA Administrator for approval no later than 1 year before the compliance date or no later than 1 year before the date you would begin using an emissions average, whichever is later. The Emissions Averaging Plan must include the information in paragraphs (c)(1) through (6).

(1) Identification of all the process units to be included in the emissions average indicating which process units will be used to generate credits, and which process units that are subject to compliance options in Tables 1A and 1B to this subpart will be uncontrolled (used to generate debits) or under-controlled (used to generate debits and credits).

(2) Description of the control system used to generate emission credits for each process unit used to generate credits.

(3) Determination of the total HAP control efficiency for the control system used to generate emission credits for each credit-generating process unit.

(4) Calculation of the RMR and AMR, as calculated using Equations 1 through 3 of §63.2240(c)(1).

(5) Documentation of total HAP measurements made according to 40 CFR 63.2240(c)(2)(iv) and other relevant documentation to support calculation of the RMR and AMR.

(6) A summary of the operating parameters the permittee will monitor and monitoring methods for each debit-generating and credit-generating process unit.

(d) Notify the EPA Administrator within 30 days before taking any of the following actions:

(1) Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements in 40 CFR Part 63 Subpart DDDD.

(2) Shutting down any process unit included in the permittee's Emissions Averaging Plan.

(3) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device

(Ref.: 40 CFR 63.2280)

5.B.19 For Emission Point AA-404, the permittee shall:

(a) Keep the following records:

(1) A copy of each notification and report that was submitted to comply with 40 CFR Part 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Documentation of any approved routine control device maintenance exemption, if such an exemption is requested under 40 CFR 63.2251.

(4) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

(b) Keep records required in Tables 7 and 8 to 40 CFR Part 63 Subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies.

(c) For each CEMS, the permittee must keep the following records:

(1) Records described in §63.10(b)(2)(vi) through (xi).

(2) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).

(3) Request for alternatives to relative accuracy testing for CEMS as required in §63.8(f)(6)(i).

(4) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(d) If complying with the emissions averaging compliance option in 40 CFR 63.2240(c), the permittee must keep records of all information required to calculate emission debits and credits.

(e) If operating a catalytic oxidizer, the permittee must keep records of annual catalyst activity checks and subsequent corrective actions

(Ref.: 40 CFR 63.2282)5.B.20

5.B.20 For Emission Points AA-404, AA-405, AA-301, AA-302, AA-303, AA-304, AA-305, AA-306, AA-307, AA-321, AA-315, and AA-319, when operating the permittee shall monitor and record the raw material input (logs and resin) to the processes on a daily basis excluding weekends and holidays. Weekend and holiday raw material input shall be recorded on the following working day. The permittee shall submit a summary report of the required monitoring in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.21 For Emission Point AA-305, when operating the permittee shall perform stack testing in accordance with EPA Reference Methods 1-5, to demonstrate compliance with the permitted emissions limitations for particulate matter. The permittee shall demonstrate compliance and submit a stack test report by March 1, 2001, and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the source at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of the a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.22 For Emission Points AA-306 and AA-307, when operating the permittee shall perform stack testing in accordance with EPA Reference Methods 1-5, to demonstrate compliance with the permitted emissions limitations for particulate matter. The testing shall be done on a rotating basis with one of the units demonstrating compliance and submittal of the stack test report by March 1, 2001, and then biennially the permittee shall test the other emission point. The performance tests should cycle between the two units on a biennial basis. For the purpose of compliance demonstration the permittee shall operate the sources at maximum capacity or at a capacity representative of its normal operation if maximum capacity cannot be achieved.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the

scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of the a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.23 For each baghouse, Emission Points AA-305, AA-306, and AA-307, when operating the permittee shall perform a visual observation of the baghouse exhaust on a weekly basis. The date and time of each observation shall be recorded in a log. If any visible emissions are observed, the permittee shall perform a visual emissions evaluation (EPA Reference Method 9) and then determine and record whether or not the unit is functioning properly. If the unit is not operating properly, appropriate corrective action shall be taken and the permittee shall record the cause, duration, and corrective and/or the preventive actions taken or planned. A summary report of these records shall be submitted in accordance with 5.A.4.

If conditions are such that opacity readings cannot be taken using observations or Method 9, the permittee shall note these conditions in the log and provide an explanation of why it was not possible to perform opacity readings/observations. Possible causes such as, but not limited to, steam plume interference, plume intermingling, and adverse weather conditions are examples in which observations or Method 9 cannot be performed.

The permittee shall perform weekly inspections of the pollution control equipment when operating. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. Records of the weekly inspections and any maintenance work performed shall be kept in log form and made available for review upon request during any inspection visit by Office personnel. A summary report of the weekly inspections and maintenance work shall be submitted in accordance with 5.A.4.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair the pollution control equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(1).)

5.B.24 For Emission Points AA-303, AA-304, and AA-321 when operating the permittee shall perform a visible observation of each cyclone's exhaust on a weekly basis. The date and time of each observation shall be recorded in a log. If any visible emissions are detected, the permittee shall perform a visual emissions evaluation (EPA Reference Method 9) and then determine and record whether or not the unit is functioning properly. If the unit is not operating properly, appropriate corrective action shall be taken and the permittee shall record the cause, duration, and corrective and/or the preventive actions taken or planned. A summary report of these records shall be summarized and reported in accordance with 5.A.4.
If conditions are such that opacity readings cannot be taken using observations or Method

9, the permittee shall note these conditions in the log and provide an explanation of why it was not possible to perform opacity readings/observations. Possible causes such as, but not limited to, steam plume interference, plume intermingling, and adverse weather conditions are examples in which observations or Method 9 cannot be performed.

The permittee shall perform weekly inspections of the pollution control equipment when operating. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. Records of the weekly inspections and any maintenance work performed shall be kept in log form and made available for review upon request during any inspection visit by Office personnel. A summary report of the weekly inspections and maintenance work shall be submitted in accordance with 5.A.4.

The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair the pollution control equipment. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(1).)

5.B.25 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, the permittee is required to demonstrate compliance with any of the applicable emission limits in Tables 2 of 40 CFR 63, Subpart DDDDD through performance testing, and the initial compliance requirements include all the following:

(a) Conduct performance tests according to §63.7520 and Table 5.

(b) Establish operating limits according to §63.7530 and Table 7.

(c) Conduct CMS performance evaluations according to §63.7525.

(Ref.: 40 CFR 63.7510(a)(1-4))

C. Specific Reporting Requirements

5.C.1 For Emission Point AA-403, the permittee shall prepare a summary report of the required monitoring, which details the raw material input (log cores) per day and submit the report in accordance with Section 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.2 For Emission Point AA-409 and AA-410, the permittee shall prepare a summary report of the required monitoring, which details the weekly inspections and maintenance work and submit the report in accordance with Section 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.3 For Emission Points AA-500 and AA-700, the permittee shall prepare a summary report of the required monitoring, which details fuel type, quantity, sulfur content (% by weight) and the heating value, on a monthly and consecutive 12 month basis; and submit the report in accordance with Section 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.4 For Emission Points AA-404, AA-405, AA-301, AA-302, AA-303, AA-304, AA-305, AA-306, AA-307, AA-321, AA-315, AA-318, the permittee shall submit a summary report of the raw material input (logs and resins), in accordance with Condition 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.5 For Emission Points AA-305, AA-306, AA-307, the permittee shall submit a report of the visual observations performed on the baghouses as well as the weekly maintenance inspections, in accordance with Condition 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.6 For Emission Points AA-303, AA-304, and AA-321, the permittee shall submit a report of the visual observations performed on the cyclones as well as the weekly maintenance inspections, in accordance with Condition 5.A.4 of this permit. (Ref: Title V Operating Permit issued January 2, 2001)

5.C.7 For Emission Point AA-404, the permittee shall submit applicable reports required by 40 CFR 63.2281. (Ref.: 40 CFR 63.2281)

5.C.8 For Emission Point AA-320, the permittee shall comply with the following monitoring, operation, and maintenance requirements:

(a) Operate and maintain the stationary RICE according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;

(b) Install a non-resettable hour meter if one is not already installed;

(c) May utilize an oil analysis program to extend the specified oil change requirements stated in Table 2d, Subpart ZZZZ, provided the analysis is performed in accordance with the requirements stated in §63.6625(i).

(Ref.: 40 CFR 63.6625(e),(f), and (i))

5.C.9 For Emission Point AA-320, the permittee shall maintain records in accordance with the requirements in §63.6655 and shall keep them readily accessible for at least five years from each occurrence. These records shall include, but are not limited to, all required maintenance activities and all hours of operation recorded by the non-resettable hour meter. (Ref.: 40 CFR 63.6655 and 63.6660)

5.C.10 For Emission Point AA-320, the permittee shall submit semiannual compliance reports in accordance with the requirements in §63.6650 and Table 7.(Ref.: 40 CFR 63.6650 and Table 7)

5.C.11 If any unit is an existing unit other than an electric utility steam generating unit, the owner or operator shall submit a report to MDEQ if the annual emissions, in tons per year, from any project identified in paragraph (r)(6)(i) of 40CFR52.21, exceed the baseline actual emissions (as documented and maintained pursuant to paragraph of (r)(6)(i)(c) if 40CFR52.21) for that regulated NSR pollutant, and such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph (r)(6)(i)(c) of 40CFR 52.21. Such report shall be submitted to MDEQ within 60 days after the end of such year. The report shall contain the following:

(a) The name, address and telephone number of the major stationary source;

(b) The annual emissions as calculated pursuant to paragraph (r)(6)(iii) of 40CFR52.21; and

(c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

5.C.12 The permittee shall make the information required to be documented and maintained pursuant to §52.21(r)(6) available for review upon a request for inspection by MDEQ or the general public pursuant to the requirements contained in §70.4(b)(3)(viii). (Ref:. 40 CFR 52.21(r)(6).

5.C.13 For Emission Points AA-500 and AA-700, the permittee shall submit a quarterly report of any periods of excess opacity emissions and monitoring system performance reports as specified in 40 CFR 60.45(g). These reports shall be submitted within thirty (30) days of the close of each calendar quarter. (Ref.: 40 CFR 60.45(g))

5.C.14 For Emission Points AA-500 and AA-700, the permittee shall submit a semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s) taken for the previous 6-month period in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R.6.3.A(3).)

5.C.15 For Emission Points AA-500 and AA-700, the permittee must submit to MDEQ all of the notifications in §63.7(b) and (c); 63.8(e), (f)(4) and (6); and 63.9(b) through (h) that apply by the dates specified. If required to conduct a performance test on this unit, the permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin. (Ref.: 40 CFR 63.7545(a)-(d))

5.C.16 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, the permittee shall submit the applicable information identified in §63.7550(a) through (e) in accordance with the annual compliance report required by Condition 4.2 of this permit.

Results of any performance test, fuel analyses, and compliance reports identified in §63.7550(h)(1) through (3) shall be submitted to EPA's WebFIRE database using the Compliance and Emission Data Reporting Interface that can be accessed through EPA's Central Data Exchange (CDX – www.epa.gov/cdx)

(Ref.: 40 CFR 63.7550(a)-(e) and Table 9 of Subpart DDDDD)

5.C.17 For Emission Points AA-500 and AA-700, the permittee shall provide MDEQ with a notification of the date construction of the control equipment is completed on each unit within five (5) days of such date. (Ref.: Appendix G, Letter of Extension of Compliance Date)

5.C.18 For Emission Points AA-500 and AA-700, the permittee shall provide MDEQ with a notification of the date each unit achieves compliance within five (5) days of such date. The compliance extension for each unit expires once this notice is provided to MDEQ. (Ref.: Appendix G, Letter of Extension of Compliance Date)

5.C.19 Beginning January 31, 2017, for Emission Points AA-500 and AA-700, the permittee shall submit a Notification of Compliance Status to MDEQ, by the end of the 60th day following the completion of all performance tests required by 5.B.14. The Notification of Compliance Status must contain all applicable information specified in §63.7545(e)(1) through (8).

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act. The full text of the referenced regulations is contained in Appendix B to this permit**.**

7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

(a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.

(b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.

(c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.

(d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.

7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.

(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)

(e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 Φm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	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

40 CFR 82

PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C

40 CFR 63 SUBPART DDDD

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR PLYWOOD AND COMPOSITE WOOD PRODUCTS

APPENDIX D

40 CFR 63 SUBPART ZZZZ

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR RECIEPROCATING INTERNAL COMBUSTION ENGINES

APPENDIX E

ROUTINE CONTROL DEVICE MAINTENANCE EXEMPTION (RCDME)

APPENDIX F

40 CFR PART 63 SUBPART DDDDD

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS

APPENDIX G

LETTER OF EXTENSION OF COMPLIANCE DATE