STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Roseburg Forest Products South LP, Taylorsville Particleboard Facility
Highway 28 West
105F Smith County Road 25
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: AUG 2 5 2015

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: JUL 3 1 2020

Permit No.: 2500-00084

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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 conditions has been extended.

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

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

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

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

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be

reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

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

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

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

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

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted

allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

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

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

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

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

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

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

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

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

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

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

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

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

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

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

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

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

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

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional

information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

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

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

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

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

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

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

(3) any change in emissions, and

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

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

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

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

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

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

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

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

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

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

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

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

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

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

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

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written 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

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SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The East Rock Dropout Screen Operation equipped with a cyclone for control of particulate matter emissions (Ref. No. CP-102).
AA-002	The West Rock Dropout Screen Operation equipped with a cyclone for control of particulate matter emissions (Ref. No. CP-112).
AA-003	The No.1 and No.2 Bauer Mills equipped with a cyclone for control of particulate matter emissions (Ref. No. CP-201)**.**
AA-004	The No.3 and No.4 Bauer Mills equipped with a cyclone for control of particulate matter emissions (Ref. No. CP-211)**.**
AA-005	The Screening Process equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-206**).**
AA-006	The Face Dryer, using the 30 MMBtu/hr wood fired burner, Emission Point AA-008, and an independent 18 MMBtu/hr natural gas burner for backup. Particulate matter emissions are controlled by a dual cyclone (Ref. No. CP-204).
AA-007	The Core Dryer, using the 30 MMBtu/hr wood fired burner, Emission Point AA-008, and an independent 18 MMBtu/hr natural gas burner for backup. Particulate matter emissions are controlled by a dual cyclone (Ref. No. CP-205).
AA-008	The 30 MMBtu/hr wood fired Roemnc (Ref. No. CP-299) burner. Under normal conditions emissions are vented to AA-006 and AA-007, however, under throttling, startup, shutdown, and emergency conditions, it vents through an emergency modulating stack.
AA-009	The Former Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-402).
AA-010	The Prepress Reject Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-403).
AA-011	The Top Head Sander Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-506).
AA-012	The Bottom Head Sander Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-516).
AA-013	The Specialty Saw Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-509B**)**.
AA-014	The First Pass Sander Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-510).
AA-015	The Jenkins Saw Hog Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-502).
AA-017	The Particleboard Press Operation. Emissions are controlled by a biofilter. (Ref. No. CP-599)
AA-018	The Process Building (Ref. No. CP-600) containing the following emission sources: the Board Cooling Operation (Ref. No. CP-522); the Urea Formaldehyde Storage Tanks; the Particleboard Storage Operation (Ref. No. CP-523).

Emission Point	Description
AA-019	63 HP Back-up Emergency Generator with Propane Fired Engine (Existing Spark Ignition Stationary Reciprocating Internal Combustion Engine)
AA-022	All Group 1 Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping
AA-023	Face and Core Blenders (Fugitive Source)
AA-100	The Warehouse Building containing the following emission source, the Particleboard Storage Operation (Ref. No. CP-523)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-017	11 Miss. Admin. Code Pt. 2, R. 1.3.F	3.B.1	PM	$E = 4.1\ p^{0.67}$ not to exceed 76.9 lbs/hr and 337.18 TPY
AA-008	11 Miss. Admin. Code Pt. 2, R. 1.3.A	3.A.1	Opacity	40%
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-017	11 Miss. Admin. Code Pt. 2, R. 1.3.B	3.A.2	Opacity	40%
AA-006 AA-007 AA-008	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.2	SO_2	4.8 lbs/MMBTU
AA-014	Federally Enforceable Construction Permit issued August 8, 1995 Ref. No. 2500-00002	3.B.3	PM/PM_{10}	1.0 lbs/hr, 4.38 tons/yr
AA-006, AA-007, AA-017, and AA-022	NESHAP for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD. 40 CFR 63.2231, 63.2232(a),(b), and (e), and 63.2233 (b)	3.B.4	HAP's	General Applicability
	40 CFR 63.2250(a),(b), and (c)	3.B.6		General Operating
AA-017	40 CFR 63.2240(b) and Tables	3.B.5	Biofilter Bed	Compliance option from Table 1B

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	1B and 2 of Subpart DDDD		Temperature	Maintain Temperature
	40 CFR 63.2251	3.B.7	HAP	Routine Control Device Maintenance Exemption
AA-019	NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ 40 CFR 63.6585, 63.6590(a)(1)(iii), 63.6602, 63.6625(j), and Table 2c	3.B.8	HAP	General Applicability and Maintenance Requirements
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.2	SO_2	4.8 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.B.6	PM	0.6 lbs/MMBTU

3.B.1 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (filterable only)in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

$E = 4.1\ p^{0.67}$

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

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

3.B.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.B.3 For Emission Point AA-014, the permittee is limited by the Federally Enforceable Construction Permit issued August 8, 1995, Ref.: 2500-00002.

3.B.4 Emission Points AA-006, AA-007, AA-017, and AA-022 are subject to and shall comply with all applicable requirements of 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. (Ref.: 40 CFR 63.2231; 63.2232(a),(b), and (e); and 63.2233(b))

3.B.5 For Emission Point AA-017, the permittee shall meet one of the compliance options listed in Table 1B of Subpart DDDD. In addition to meeting one of the compliance options, the permittee must also maintain the 24-hour block biofilter bed temperature within the range established during the performance test required in Condition 5.B.13 of this permit. (Ref.: 40 CFR 63.2240(b) and Tables 1B and 2 of Subpart DDDD)

3.B.6 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall be in compliance with all applicable compliance options, operating requirements and work practice requirements at all times, except during periods of startup, shutdown or malfunction and during the times allowed by the routine control device exemption contained in Condition 3.B.7. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

The permittee must develop a written Startup, Shutdown and Malfunction Plan (SSMP) for the appropriate units according to the requirements in 63.6(e)(3). (Ref.: 40 CFR 63.2250(a),(b), and (c))

3.B.7 For Emission Point AA-017, the permittee is not required to comply with the corresponding compliance options or operating requirements during periods of maintenance covered in the approved Routine Control Device Maintenance Exemption (RCDME) found in Appendix B of this permit. Emissions must be minimized to the greatest extent possible when operating during these periods. Under the conditions for which this exemption was approved, the following maintenance activities are allowed under this exemption:

(a) biofilter nozzle inspection and replacement;
(b) biofilter plumbing inspection and repair;
(c) biofilter media cleaning; and,
(d) biofilter media changeout.

The permittee shall limit the total downtime of the control device to less than 0.5 percent of the annual operating uptime. (Ref.: 40 CFR 63.2251 and Appendix B of this permit)

3.B.8 Emission Point AA-019 is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

For the purpose of Subpart ZZZZ, the engine is considered an existing spark ignition (SI) emergency stationary RICE with a site rating less than 500 brake HP located at a major source of HAP emissions and, as such, must comply with the following requirements except during periods of startup:

1) Change oil and filter every 500 hours of operation or annually, whichever comes first;

2) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and replace as necessary

3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements in accordance with the schedule above or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the risk has abated. The work practice should be completed as soon as practicable after the emergency has ended or the risk has abated. The permittee should report any failure to perform the work practice according to the schedule above and describe the conditions for which the delay was necessary.

The permittee may also utilize the oil analysis program in §63.6625(j) to extend the specified oil change requirement.

(Ref.: 40 CFR 63.6585, 63.6590(a)(1)(ii), 63.6602, 63.6625(j) and Table 2c of Subpart ZZZZ)

3.B.9 For Emission Point AA-019, 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).)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO_2	4.8 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.3.F	3.C.3	PM	$E = 4.1p^{0.67}$

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

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

3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (filterable only)in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

D. Work Practice Standards

3.D.1 For Emission Points AA-006 and AA-007, the permittee shall process furnish with a 24-hour block average inlet moisture content of less than or equal to 30 percent (by weight, dry basis) and operate with a 24-hour block average inlet dryer temperature of less than or equal to 600 °F. (Ref.: 40 CFR 63.2241(a) and Table 3 of Subpart DDDD)

3.D.2 For Emission Point AA-022, the permittee shall only use non-HAP coatings in all Group 1 Miscellaneous Coating operations. A non-HAP Coating is defined as a coating with HAP contents below 0.1 percent by mass for OSHA-defined carcinogens and below 1.0 percent by mass for other HAP compounds. (Ref.: 40 CFR 63.2241(a), 63.2292, and Table 3 of Subpart DDDD)

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

(a) the date, place as defined in the permit, and time of sampling or measurements;

(b) the date(s) analyses were performed;

(c) the company or entity that performed the analyses;

(d) the analytical techniques or methods used;

(e) the results of such analyses; and

(f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

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

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from 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

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001 through AA-007, AA-009 through AA-015, and AA-017	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2)	5.B.1	Raw Material Input	Daily and Monthly Monitoring and Recordkeeping
AA-006 through AA-008	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2)	5.B.2	Fuel Usage	Daily and Monthly Monitoring and Recordkeeping
AA-014	Federally Enforceable Construction Permit issued August 8, 1995, Ref. No. 2500-00002 and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.3	PM/PM_{10}	The permittee shall demonstrate compliance with particulate matter limitations and opacity by stack testing in accordance with EPA Reference Methods 1-5 and 9 during the first calendar quarter of 2017, and biennially thereafter
AA-001 through AA-007, AA-009 through AA-015, and AA-017	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2)	5.B.4	Weekly Inspections	The permittee shall perform weekly inspections of the air pollution control equipment. Records shall be maintained on site.
	11 Miss. Admin. Code Pt. 2, R 6.3.A.(3)(a)(2)	5.B.5	Opacity	The permitee shall perform weekly opacity observations which may include a VEE. (This does not include Emission Points AA-009, AA-014, and AA-017.)
Group 1 Group 2 Group 3	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.6	PM/PM_{10}	Stack Testing
AA-019	40 CFR 63.6625(e), (f), (h) and (j), 63.6640(a), and Table 6 of Subpart ZZZZ	5.B.10	HAP	Monitoring, Recordkeeping and Reporting
	40 CFR 63.6640(f)(1) through (3)	5.B.11		Monitoring, Recordkeeping and Reporting

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-019	40 CFR 63.6625(j), 63.6655(a), (d), (e), and (f), and 63.6660(b) and (c)	5.B.12	HAP	Monitoring, Recordkeeping and Reporting
AA-017	40 CFR 63.2262(a), (b)(2),(c),(d)(1),(e), (f),(g),(h), and (m), 63.2271(a), and Table 7 of Subpart DDDD	5.B.13	HAP	Performance Testing
	40 CFR 63.2271(a) and Table 7 of Subpart DDDD	5.B.16	Biofilter Bed Temperature	Monitoring
	40 CFR 63.2251 and Appendix B of this permit	5.B.17	Maintenance/Operating Periods	Recordkeeping
AA-006 AA-007	40 CFR 632271(a) and Table 8 of Subpart DDDD	5.B.18	Moisture Content and Inlet Temperature	Monitoring
AA-022	40 CFR 63.2271(a) and Table 8 of Subpart DDDD	5.B.19	HAP Content in Coatings	Monitoring
AA-006 AA-007 AA-017	40 CFR 63.2269(a),(b), and (c)	5.B.14	HAP	Monitoring
	40 CFR 63.2270(a), (b),(c),(e), and (f)	5.B.15		
AA-006 AA-007 AA-017 AA-022	40 CFR 63.2271(b)	5.B.20	HAP	Monitoring
AA-006 AA-007 AA-017 AA-022	40 CFR 63.2282(a)	5.B.21	Parametric Monitoring	Recordkeeping

5.B.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, and AA-017, the

permittee shall monitor and record the raw material input (wood, wax, and resin) to the processes on a daily basis. The permittee shall report a summary of the required monitoring in accordance with 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.2 For Emission Points AA-006, AA-007, and AA-008, the permittee shall monitor and record all fuels combusted. These records shall consist of fuel type, quality and quantity, and the heating value (Btu/gal or Btu/ft3), on a monthly basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.3 For Emission Point AA-014, the permittee shall demonstrate compliance with particulate matter limitations and opacity by stack testing in accordance with EPA reference Methods 1-5 and 9 during the first calendar quarter of 2017 and submittal of a stack test report no later than June 1, 2017, and biennially thereafter. For the purposes of the compliance demonstration, the permittee shall operate the sources at peak load conditions. For the purpose of compliance demonstration, peak load conditions shall be identified as within 20% of the maximum rated capacity of the sources. The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure all methods 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. (Ref.: Federally Enforceable Construction Permit issued August 8, 1995, Ref. No. 2500-00002)

5.B.4 For Emission Points AA-001 through AA-007, AA-009 through AA-015, and AA-017, the permittee shall perform weekly inspections of the air pollution control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment. In the event of a failure of the air pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the air pollution control equipment is restored. Records of weekly inspections and any maintenance work shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. The permittee shall maintain these records for at least five (5) years following the date of such record. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.5 For Emission Points AA-001 through AA-007, AA-010 through AA-013, and AA-015, the permittee shall assure compliance with the opacity limitations by having an observer perform weekly opacity observations for a minimum of six (6) consecutive minutes and maintain a log of the results. These observations shall be performed on each stack, but may be conducted from a location allowing the observation of multiple emission points simultaneously. If any visible emissions are detected, then a Visible Emission Evaluation (VEE) shall be performed using EPA Reference Method 9 by a certified observer. If any visible emissions are detected from a stack, the observation on that stack may be immediately ceased and the VEE may then be performed by a certified observer.

If conditions are such that opacity readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of

why it was not possible to perform opacity readings/observations. The permittee shall maintain a log of the results and the log shall be made available upon request from MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.6 For the following groups of Emission Points: Group (1) AA-001 and AA-002; Group (2) AA-006 and AA-007; and Group (3) AA-011 and AA-012, the permittee shall test for particulate matter and demonstrate compliance with the opacity limitations by stack testing in accordance with EPA reference Methods 1-5 and 9 during the first calendar quarter of 2017 and submittal of a stack test report no later than June 1, 2017, and biennially thereafter. The testing shall be done on a rotating basis with one of the units in each group of Emission Points being tested and testing cycling between the units of each group on a biennial basis. For the purposes of the compliance demonstration, the permittee shall operate the sources at peak load conditions. For the purpose of compliance demonstration, peak load conditions shall be identified as within 20% of the maximum rated capacity of the sources. The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure all methods 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. (Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(10))

5.B.7 Within sixty (60) days of permit issuance, the permittee shall submit an implementation plan and schedule for installation, testing, etc of the pressure drop monitoring device for Emission Points AA-009 and AA-014. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after issuance of the permit. (Ref.: 40 CFR Part 64)

5.B.8 For Emission Points AA-009 and AA-014, the permittee shall comply with the compliance assurance monitoring (CAM) requirements as described in Condition 5.B.9 and as specified in Parts 64.7 through 64.9. (Ref.: 40 CFR Part 64)

5.B.9 The table below is the CAM plan for Emission Points AA-009 and AA-0014:

	Indicator No. 1	**Indicator No. 2**
I. Indicator	Pressure Drop	Visible Emissions
Measurement Approach	The pressure drop through the baghouse is not measured (no differential pressure gauge is installed).	A visual observation of emissions will be performed weekly while the process is operating and in concurrence with the pressure drop reading. When emissions are observed, a full method 9 will be performed.
II. Indicator Range	Monitoring for the indicator ranges will begin no later than 180 days after permit issuance. Upon determination of the indicator ranges, the facility must apply for a minor modification of the Title V permit to include the proposed ranges.	An excursion is defined as the presence of any emissions. Excursions trigger an inspection, corrective action, and a reporting requirement within five (5) working days.

III. Performance Criteria A. Data Representiveness	Differential pressure gauges will be located where a representative measurement can be determined through visual observation of the pressure across the unit.	Measurements are being made at the emission point (Baghouse Exhaust).
B. Verification of Operational Status	Pressure drop gauges will be installed pursuant to the manufacturer's specifications. Gauges will be checked periodically as described below.	NA
C. QA/QC Practices and Criteria	The pressure gauges will be installed in accordance with the manufacturer's specifications. Gauges will be calibrated against a known source of pressure at least once annually or replaced. Calibration records should identify the instrument calibrated, the date of calibration, the person who performed the calibration and the measurements observed.	An onsite person performing visual observations will be trained. MDEQ or equivalent trainer will certify VEE observer twice per year.
D. Monitoring Frequency E. Data Collection Procedures	Readings from the pressure drop gauges shall be recorded daily.	Visual observations will be performed for six minutes weekly. If emissions are visible, then an EPA Method 9 will be performed.
	Results of checking readings from the pressure drop gauges shall be recorded in a log located at the facility.	Opacity observations, and if needed, EPA Method 9, will be recorded and kept in an Opacity Log
F. Averaging Period	Pressure gauges monitor information continuously. Measurements are recorded intermittently. Individual measurements will be compared directly to the indicator range, without averaging.	Visual observation: 6 minute test EPA Method 9: 24 observations at 15 second intervals

5.B.10 For Emission Point AA-019, the permittee shall comply with the following monitoring, operating, 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. If you use an oil analysis program in order to extend the oil change requirement in Condition 3.B.8, the oil analysis program must be part of the maintenance plan.

(b) The permittee must install a non-resettable hour meter; if one is not already installed.

(c) The permittee shall minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, and minimize the time spent at idle during startup.(Ref.: 40 CFR 63.6625(e), (f), (h), and (j), 63.6640(a), and Table 6 of Subpart ZZZZ)

5.B.11 For Emission Point AA-019, the permittee shall operate the engine according to the following:

(a) There is no time limit on the use of the engine during an emergency situation;

(b) The engine may be operated for a maximum of 100 hours per year for any combination of the following:

(1) For maintenance checks and readiness testing, provided they are recommended by federal, state or local government, the manufacturer, the

vendor, the authority and regional transmission organization or equivalent balancing transmission operator, or the insurance company associated with the engine.

(2) For emergency demand response for periods in which the Reliability Coordinator under NERC, or other authorized entity, has declared an Energy Emergency Alert Level 2.

(3) For periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(c) The engine may be operated up to 50 hours per year in non-emergency situations; however, those 50 hours count towards the 100 hour limit in (b) above. The 50 hours per year for non-emergency operations cannot be used for peak shaving or non-emergency demand response; or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial agreement with another facility.

Any operation other than what is provided for in (a) through (c) above is prohibited. (Ref.: 40 CFR 63.6640(f)(1)through (3))

5.B.12 For Emission Point AA-019, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:

(a) Copies of reports submitted to comply with 40 CFR 63, Subpart ZZZZ;
(b) Records of the occurrence and duration of each malfunction;
(c) Records of any actions taken to minimize emissions during a malfunction;
(d All maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in Condition 5.B.10(a);
(e) Records of oil changes for the engine, including the results of any oil analyses performed according to Condition 3.B.8;
(f) The hours of operation of the engine recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operations, including what classified the event as an emergency, and how many hours are spent for non-emergency operation. (Ref.: 40 CFR 63.6625(j), 63.6655(a), (d), (e), and (f), and 63.6660(b) and (c))

5.B.13 For Emission Point AA-017, the permittee shall conduct subsequent performance tests using the applicable method(s) specified in Table 4 of Subpart DDDD within two years following the previous performance test and within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media.

All performance testing shall be done in accordance with the following:

(a) All tests must be done under representative operating conditions as defined in §63.2292. The representative conditions must be described in the performance test report and shall include an explanation as to why they are representative.
(b) Each performance test must contain three separate 1-hour test runs.
(c) All sampling sites must be located at the inlet and outlet of the control device.

(d) The operating parameter monitoring system must collect data at least once every 15 minutes during the entire performance test.
(e) All non-detect data must be treated as one-half the method detection limit.
(f) The percent reduction across the control device must be calculated using Equation 1 from 63.2262(h).
(g) The biofilter operating requirements must be established as follows:
    1. The biofilter bed temperature must be continuously monitored during each of the 1-hour test runs conducted during the performance test. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs.

The biofilter bed temperature operating range may be expanded by providing proper notification and conducting a repeat performance test.
(Ref.: 40 CFR 63.2262(a),(b)(2),(c),(d)(1),(e),(f),(g),(h), and (m), 63.2271(a), and Table 7 of Subpart DDDD)

5.B.14 For Emission Points AA-006, AA-007 and AA-017, the permittee shall install, operate, and maintain each **continuous parameter monitoring system** (CPMS) per the following:

(a) Each CPMS must be able to complete one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
(b) All monitoring equipment must be maintained by keeping necessary parts needed for routine repairs.
(c) The permittee shall record the results of each inspection, calibration, and validation check.

Each **temperature monitoring device** shall meet (a) through (c) above and shall also:
(d) Be located in a position that provides a representative temperature;
(e) Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger;
(f) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F
(g) Perform an electronic calibration at least semiannually in accordance with the manufacturer's owner's manual.
(h) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
(i) Inspect all components for integrity and all electrical connections for continuity, oxidation and galvanic corrosion at least quarterly.

For each **furnish moisture meter**, the permittee shall meet (a) thorugh (c) above and shall also:
(j) Use a continuous moisture monitor with a minimum accuracy of 1 percent (dry basis) moisture or better in the 25 to 35 percent (dry basis) moisture content range.

(k) Locate the moisture monitor in a position that provides a representative measure of furnish.
(l) Calibrate the moisture monitor per the manufacturer's specifications at least once per semiannual compliance period (or more frequently if recommended by manufacturer).
(m) Inspect all components of the moisture monitor for integrity and all electrical connections for continuity at least quarterly.
(n) Use the Equation 1 from §63.2269(c)(5) to convert percent moisture measurements wet basis to a dry basis.

(Ref.: 40 CFR 63.2269(a),(b), and (c))

5.B.15 For Emission Points AA-006, AA-007, and AA-017, the permittee shall monitor operations at all times when the process is in operation. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods or during required quality assurance or control activities shall not be used when calculating data averages. All other data must be used to assess compliance.

The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered under the routine control device maintenance exemption from Condition 3.B.7 in any data average or calculation used to report emission or operating levels, nor may it be used to meet a minimum data availability requirement.

For Emission Points AA-006, AA-007, and AA-017, the permittee shall determine the 24-hour block average of all recorded readings, calculated every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours. To calculate the 24-hour data average, the permittee must have at least 75 percent of the required readings for that period using only recorded readings that are bases on valid data. (Ref.: 40 CFR 63.2270 (a),(b),(c), (e), and (f)).

5.B.16 For Emission Point AA-017, the permittee shall demonstrate continuous compliance with the chosen compliance option from Condition 3.B.5 by collecting and recording the biofilter bed temperature, reducing the data to the 24-hour block average, and maintaining the average biofilter bed temperature within the range established during the previous performance test. (Ref.: 40 CFR 63.2271(a) and Table 7 or Subpart DDDD)

5.B.17 For Emission Point AA-017, the permittee shall keep records of the control device downtime that occurs as a result of one of the maintenance activities listed in Condition 3.B.7 during the process operating uptime. Such information shall be maintained on a 365-day rolling total and reported in accordance with Condition 5.C.7. (Ref.: 40 CFR 63.2251 and December 17, 2007, MDEQ Approval for RCDME in Appendix B of this permit).

5.B.18 For Emission Points AA-006 and AA-007, the permittee shall demonstrate continuous compliance with the work practice standard in Condition 3.D.1 by maintaining the 24-hour block average inlet moisture content at less than or equal to 30 percent (by weight,

dry basis), maintaining the 24-hour block average inlet dryer temperature at less than or equal to 600°F, and keeping records of both. (Ref.: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD).

5.B.19 For Emission Point AA-022, the permittee shall demonstrate continuous compliance with the work practice standard in Condition 3.D.2 by continuing to use non-HAP coatings and keeping records showing that only non-HAP coatings are being used. (Ref.: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD)

5.B.20 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall record each instance of non-compliance with any compliance option, operating requirement, or work practice requirement. This includes deviations which occur during periods of startup, shutdown, and malfunction and periods of control device maintenance. (Ref.: 40 CFR 63.2271(b))

5.B.21 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall keep records of the following (if applicable):

(a) A copy of each notification and report submitted to comply with Subpart DDDD.
(b) All records related to startup, shutdown, and malfunction.
(c) Documentation of the approved RCDME.
(d) Records of performance tests and performance evaluations
(e) Records that show continuous compliance with each compliance option, operating requirement and work practice requirement.

These records shall be available for review and must be kept for a period of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Each record must be kept on site for at least 2 years after the date and then may be kept offsite for the remaining 3 years.
(Ref.: 40 CFR 63.2282(a) and (b) and 63.2283(a),(b), and (c))

C. Specific Reporting Requirements

5.C.1 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, and AA-017, the permittee shall submit a report that details the raw material input (wood, wax, resin) on a daily basis, and in accordance with Condition 5.A.4 of this permit.

5.C.2 For Emission Points AA-006, AA-007, and AA-008, the permittee shall submit a report that details the usage of fuel, including fuel type, quality, and quantity, and the heating value, on a monthly and consecutive 12 month basis. The report shall be submitted in accordance with Condition 5.A.4 of this permit.

5.C.3 For Emission Points AA-005, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, and AA-017, the permittee shall submit a report summarizing the weekly visual observations, and the weekly inspections of the baghouses and biofilter, in accordance with Condition 5.A.4 of this permit.

5.C.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-006, and AA-007, the permittee shall submit a report summarizing the weekly visual observations and the weekly maintenance inspections of the cyclones, in accordance with Condition 5.A.4 of this permit.

5.C.5 The permittee shall submit the following notifications:

(a) For Emission Point AA-017, an intent to conduct a performance test at least 60 days prior to the test date;

(b) For Emission Points AA-006, AA-007, and AA-017, a notification within 30 days before taking any of the following actions:

(1) Modify or replace the control system

(2) Change a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

(40 CFR 63.2280(a), (c), and (g)(1) and (3))

5.C.7 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall submit a compliance report containing the following information (if applicable) in accordance with Condition 5.A.4 of this permit:

(a) Company name and address.

(b) Statement by a responsible official certifying the truth, accuracy, and completeness of the report.

(c) Beginning and ending dates of reporting period.

(d) Any information concerning the actions taken that are consistent with the startup, shutdown and malfunction plan.

(e) A description of any control device maintenance performed while the control device was offline and the process was still operating, including the following:

(1) The date and time the control device was shut down and restarted;

(2) Identification of the emission point that was operating and the time it operated while the control device was offline;

(3) A statement concerning whether or not the control device maintenance was included in the RCDME. If it was included, the following additional information should be included in the report:

A. the total amount of time the process unit operated during the semiannual period and during the previous semiannual compliance period;

B. the total amount of time the process unit operated during the semiannual period and during the previous semiannual compliance period while the control device was down for maintenance covered under the exemption; and,

C. a calculation of the annual percent of process unit operating uptime where the control device was offline for routine maintenance in accordance with Equation 1 of §63.2281(c)(5)(iii)(C)

(f) The results of any performance tests conducted during the reporting period.

(g) If there were no deviations from any compliance option, operating requirement, or work practice standard, a statement that there were no such deviations during the reporting period.

(h) If there were no periods during which a continuous monitoring system (CMS) was out-of-control, a statement that there were no out-of-control periods during the reporting period.

(Ref.: 40 CFR 63.2281(a),(b),(c), and Table 9 of Subpart DDDD)

5.C.8 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall report all deviations identified in Condition 5.B.19 in accordance with Condition 5.A.5 of this permit. For each deviation from an applicable requirement (including those attributable to a startup, shutdown, malfunction and the RCDME), the permittee shall report the following information in addition to (a) through (f) in Condition 5.C.7 in the semiannual report:

(a) The date and time each malfunction started and stopped
(b) The date and time each CMS was inoperative, except for zero (low-level) and high-level checks.
(c) The date and time each CMS was out of control.
(d) The date and time each deviation started and stopped and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of maintenance covered under the RCDME; or during another period.
(e) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
(f) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes and other unknown causes.
(g) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that period.
(h) A brief description of the process unit(s).
(i) A brief description of the CMS.
(j) The date of the last CMS certification or audit.
(k) A description of any changes in CMS, processes, or controls since the last reporting period.(Ref.: 40 CFR 63.2271(b) and (c), 63.2281(e))

5.C.9 For Emission Point AA-017, the permittee shall submit an immediate startup, shutdown, and malfunction report if the event is not consistent with the SSMP developed in Condition 3.B.6 This report shall contain the actions taken for the event and shall be reported to the MDEQ by telephone or fax within 2 working days after starting actions inconsistent with the plan. A letter explaining the circumstances of the event; the reason(s) for not following the startup, shutdown, and malfunction plan; a description of any excess emissions and/or parameter monitoring exceedances which are believed to have occurred; and any actions that were taken to minimize emissions during the event shall be submitted to the MDEQ under signature of the responsible official certifying the report's accuracy within 7 working days after the end of the event. (Ref.: 40 CFR 63.2281(a) and Table 9 of Subpart DDDD)

5.C.10 For Emission Point AA-019, the permittee shall report each deviation from a work practice requirement from Condition 3.B.8 in accordance with the semiannual compliance report required in Condition 5.A.4.
(Ref.: 40 CFR 63.6640(b) and 63.6650(f))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

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

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1. Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2. Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3. Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4. Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5. Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6. Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7. Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_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 μm 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

MDEQ APPROVAL OF ROUTINCE CONTROL DEVICE MAINTENANCE EXEMPTION