

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT
TO OPERATE AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT**

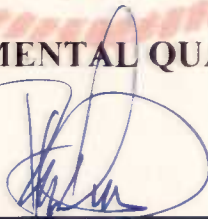
Knu LLC
Broad Street
Washington, County

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: OCT 02 2015

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: SEP 30 2020

Permit No.: 2800-00014

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS..... 3
SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES..... 13
SECTION 3. EMISSION LIMITATIONS & STANDARDS 14
SECTION 4. COMPLIANCE SCHEDULE 24
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS 25
SECTION 6. ALTERNATIVE OPERATING SCENARIOS..... 30
SECTION 7. TITLE VI REQUIREMENTS..... 31

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS.

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 (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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Finishing Operations for wood chair parts where stain and a topcoat are applied through six spray booths and two electric drying ovens and emissions in which emissions are exhausted through a dry filter.
AA-003	Gluing operations which include two adhesive spray booths to attach the fabric to the foam cushion.

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
Entire Facility	40 CFR 63.800	3.B.1	VHAPs	All applicable requirements & limitations and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants from Wood Manufacturing Operations.
AA-001	40 CFR 63.802	3.B.2	VHAPs	1 lb VHAPs / lb solids applied or emitted
AA-001	Construction Permit issued March 10, 1992	3.B.4	VOCs	160 tons per year
AA-003	40 CFR 63.802	3.B.3	VHAPs	1.8 lb VHAPs / lb solids applied for adhesives meeting certain flammability requirements or 1.0 lb VHAPs/lb solids that do not meet flammability requirements

- 3.B.1 This facility is subject to and shall comply with all applicable requirements, limitations and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations. (Ref.: 40 CFR 63.800).
- 3.B.2 For Emission Point AA-001, the finishing operation, the permittee shall limit emissions from finishing operations by : (1) achieving a weighted average VHAP content across all coating of 1 lb VHAPs/ lb solids, as applied. Coatings include such materials, but not limited to paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings or (2) using compliant finishing materials that limit stains, washcoats, sealers, topcoats, basecoats and enamels to 1 lb VHAPs/ lb solids as applied and thinners at a maximum content of 10% VHAPs or (3) using a control device that limits emissions to 1 lb VHAPs/ lb of solids applied or (4) a combination of (1), (2), and (3) that limit emissions to 1 lb VHAPs/ lb of solids applied.(Ref.: 40 CFR 63.802 (a) (1))
- 3.B.3 For Emission Point AA-003, the gluing operations, the permittee shall limit VHAPs emissions by achieving a VHAP limit for contact adhesives based upon the following criteria:
- (1) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, Or 133, the Business and Institutional Furniture Manufactures Association's (BIFMA's) X 5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 lb VHAPs/ lb solids.

(2) For all other contact adhesives, including foam adhesives used in products that do not meet the standards presented in the preceding paragraph of this section, but excluding aerosol adhesives and contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 lb VHAPs/ lb solids, as applied. (Ref.: 40 CFR 63.802 (a)(2)).

- 3.B.4 For AA-001, identified as the Chair Finishing Line in the original construction permit, the permittee shall limit the total volatile organic compounds (VOCs) to no more than 160 tons per year. (Ref.: Construction Permit issued March 10, 1992).

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	Filterable 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

3.C.1 The maximum permissible emission of ash and/or particulate matter (filterable only) 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).)

D. Work Practice Standards

- 3.D.1 The permittee shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation affected by National Emission Standards for Wood Furniture Manufacturing Operations. This plan shall address Paragraphs 3.D.2 through 3.D.12 and shall be available for inspection by the DEQ upon request. (Ref.: 40 CFR 63.803(a))
- 3.D.2 The permittee shall train all new and existing personnel, including contract personnel who are involved in finishing, gluing, cleaning, and washoff operations; use of manufacturing equipment; or implementation of the requirements of National Emission Standards for Wood Furniture Manufacturing Operations. All new personnel shall be trained upon hiring. All existing personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
- (a) A list of all current personnel by name and job description that are required to be trained;
 - (b) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - (c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
(Ref.: 40 CFR 63.803(b))

3.D.3 The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

- (a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
- (b) An inspection schedule;
- (c) Methods for documenting the date and results of each inspection and any repairs that were made;
- (d) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (1) A first attempt at repair (e.g. tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months. (Ref.: 40 CFR 63.803(c))

3.D.4 The permittee shall develop an organic HAP solvent accounting form to record:

- (a) The quantity and type of organic HAP solvent used each month for washoff and cleaning as defined in § 63.801
- (b) The number of pieces washed off, and the reason for the washoff; and
- (c) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
(Ref.: 40 CFR 63.803(d))

3.D.5 The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ, which are in concentrations subject to Material Safety Data Sheet (MSDS) reporting as required by the Occupational Safety and Health Administration (OSHA). (Ref.: 40 CFR 63.803(e))

3.D.6 The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material

used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating. (Ref.: 40 CFR 63.803(f))

- 3.D.7 The permittee shall use normally closed containers for storing finishing, cleaning, gluing, and washoff materials. (Ref.: 40 CFR 63.803(g))
- 3.D.8 The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
- (a) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (b) For touchup and repair under the following conditions:
 - (1) The touchup and repair occurs after completion of the finishing operation; or
 - (2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (c) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - (d) When emissions from the finishing application station are directed to a control device;
 - (e) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period, or
 - (f) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

The permittee shall demonstrate technical or economic infeasibility by submitting to DEQ a videotape, a technical report, or other documentation that supports the affect's claim of technical or economic infeasibility. The following criteria shall be used independently or in combination, to support the claim of technical or economic infeasibility:

- (1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

- (2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain. (Ref.: 40 CFR 63.803(h))

3.D.9 The permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container. (Ref.: 40 CFR 63.803(i))

3.D.10 The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container. (Ref.: 40 CFR 63.803(j))

3.D.11 The permittee shall control emissions from washoff operations by:

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

(Ref.: 40 CFR 63.803(k))

3.D.12 The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

- (a) Identifies VHAP from the list presented in Table 5 of Subpart JJ that are being used in finishing operations;
- (b) Establishes a baseline level of usage by the permittee, for each VHAP identified in 3.D.12 (a) of this permit. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified. For Formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in § 63.805 (d) or (e).
- (c) Tracks the annual usage of each VHAP identified in 3.D.12 (a) of this permit that is present in amounts subject to MSDS reporting as required by OSHA.
- (d) If, after November 1998, the annual usage of the VHAP identified in 3.D.12 (a) of this permit exceeds its baseline level, then the permittee of the affected source shall provide a written notification to the DEQ that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from

further action, unless the permittee is not in compliance with other requirements for that VHAP:

- (1) The exceedance is no more than 15.0 percent above the baseline level;
 - (2) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based in the overall control efficiency of the control system, which is determined using the procedures in § 63.805 (d) or (e);.
 - (3) The permittee is in compliance with any other DEQ regulations or guidelines for the VHAP; or
 - (4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
- (e) If none of the above explanations are the reason for the increase, the permittee shall confer with DEQ to discuss the reason for the increase and whether there are practical and reasonable technology based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturer's operations, or other criteria mutually agreed upon by DEQ and the permittee. If there are no practical and reasonable solutions, the permittee need take no further action. If there are solutions, permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (f) If the permittee uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP potential concern is provided in Table 5 of Appendix C of Subpart JJ. If usage of the VHAP of potential concern exceeds the de minimis level, then the permittee shall provide an explanation to DEQ that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Paragraph 3.D.12.d (1) through (4) the permittee shall follow the procedures established in Paragraph 3.D.12.e. (Ref.: 40 CFR 63.803(l))

E. Operation and Maintenance Requirements

The permittee shall, at all times including periods of startup, shutdown, and malfunctions, operate and maintain Emission Points AA-001, and AA-003 in a manner consistent with good air pollution control practices for minimizing emissions at least to the emission levels authorized herein. (Ref.: 40 CFR 63.6(e))

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

- 5.B.1 The permittee shall maintain on site the work practice implementation plan and all records associated with fulfilling Paragraphs 3.D.1 through 3.D.12.
(Ref.: 40 CFR 63.806(e))
- 5.B.2 For Emission Point AA-001, to comply with Construction Permit 2800-00014 issued March 10, 1992, the permittee shall determine the following for each adhesive, coating, and solvent utilizing data supplied by the manufacturer or by analysis of each adhesive, coating, and solvent using EPA Reference Method 24, CFR 60, Appendix A:
- a) The adhesives, coatings, and solvents used during a reporting period;
 - b) The total gallons and/or pounds of each adhesive, coating, and solvent used in any consecutive 12 month rolling period;
 - c) The percentage of VOCs by weight of each adhesive, coating, and solvent. A description of the method used to determine the VOC shall accompany this data;
 - d) The total VOC emission rate in both pounds/day and tons/year for each consecutive 12 month rolling period.
- (Ref.: 11 Miss. Admin. Code Pt.2, R.2.2.B(10))
- 5.B.3 For Emission Points AA-001 and AA-003, the permittee shall maintain the following records:
- (a) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in §63.802; and
 - (b) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802; and
 - (c) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in §63.802(a)(3) or (b)(3).
- (Ref.: 40 CFR 63.806(b))
- 5.B.4 For Emission Points AA-001, and AA-003, the permittee subject to the emission limits in § 63.802 and following the compliance provisions of § 63.804(g) shall maintain records of the compliance certifications submitted in accordance with § 63.807 (c) for each semiannual period following the compliance date. (Ref.: 40 CFR 63.806(h))
- 5.B.5 For Emission Points AA-001, and AA-003, the permittee shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semiannual reports required by §63.807(c). (Ref.: 40 CFR 63.806(i))

- 5.B.6 For Emission Points AA-001, and AA-003, the permittee shall maintain all records in accordance with requirements of §63.10(b)(1). (Ref.: 40 CFR 63.806(j))
- 5.B.7 For Emission Points AA-001 and AA-003, the permittee shall demonstrate compliance with all applicable compliance procedures and monitoring as prescribed in 40 CFR 63.804.(40 CFR 63.804).

C. Specific Reporting Requirements

5.C.1 The permittee shall report to the DEQ, in writing, any change in the information previously provided in any notification as required by §63.9 within 15 calendar days after the change. (Ref.: 40 CFR 63.9(j))

5.C.2 For Emission Point AA-001, to comply with Construction Permit 2800-00014 issued March 10, 1992, the permittee shall submit to the Office of Pollution Control, a semi-annual report summarizing:

- a) Each adhesive, coating, and solvent used;
- b) The total gallons and/or pounds of each adhesive, coating and solvent used in any consecutive 12 month rolling period;
- c) The VOC content of each additive, adhesive, coating and solvent;
- d) The total VOC emission rate in both pounds/day and tons/year for each consecutive 12 month rolling period

(Ref.: 11 Miss. Admin. Code Pt.2, R.2.2.B(11))

5.C.3 For Emission Points AA-001, and AA-003, the permittee shall submit a semiannual report covering the previous 6 months of wood furniture manufacturing operations within 30 calendar days of the 6-month reporting period. The semiannual report shall include the information required by §63.804(g)(1),(2),(3),(5),(7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if in noncompliance, the measures taken to bring the affected source into compliance. (Ref.: 40 CFR 63.807(c))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://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

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-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 Fm 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
NESHAP, Subpart JJ