

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Hood Industries Inc., Beaumont
224 Delta Pine Road
Beaumont, Mississippi
Perry 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: May 6, 2014

Modified: SEP 14 2016

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: April 30, 2019

Permit No.: 2200-00003

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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 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless

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

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

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

1.9 Any document required by this permit to be submitted to the DEQ shall contain a

certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

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

requirements prior to or at the time of permit issuance;

- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

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

1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

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

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
 - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
 - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
 - (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
 - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

- (f) any change in ownership of the stationary source."
- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

- (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
 - (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-010	Dry Waste Cyclone #1: This cyclone receives waste from the sawline, lay-up line flying saw, and dry floor wastes.
AA-011	Stud Mill / Topwood Chip Blowpipe Discharge: Blowpipe used to load chips from the stud mill and topwood chippers into rail cars. (Simultaneous operation of AA-011, AA-019b, or AA-033 is not possible or permitted.)
AA-012	Veneer Chip Blowpipe Discharge: Blowpipe used to load chips from the veneer chipper into rail cars. (Simultaneous operation of AA-012 and AA-019a is not possible or permitted.)
AA-015	Stud Mill Fines Cyclone: This cyclone receives fines from the stud mill chip screen.
AA-016	Dry Waste Cyclone #2: This cyclone receives waste from AA-010 and AA-020.
AA-019a	Veneer Chip Cyclone: Wood waste may be diverted to either AA-012 or AA-019a. (Simultaneous operation of AA-012 and AA-019a is not possible or permitted.)
AA-019b	Stud Mill/Topwood Chip Cyclone: Wood waste may be diverted to either AA-011, AA-019b or AA-033. (Simultaneous operation of AA-011, AA-019b, or AA-033 is not possible or permitted.)
AA-020	Sander Dust Cyclone
AA-023	Stud Mill Chip Cyclone
AA-024	Chip Fines Cyclone
AA-029a	Simple-Kamp Plywood Press #1 (30-opening)
AA-029b	Simple-Kamp Plywood Press #2 (30-opening)
AA-030	Bigelow Model K Woodwaste Boiler rated at a maximum heat input capacity of 140 MMBTUH, and equipped with a cyclone and a scrubber (The scrubber will be replaced with an Electrostatic Precipitator)
AA-031	COE 20 Section Steam-heated Veneer Dryer which is vented through Emission Point AA-034
AA-032	COE 16 Section Steam-heated Veneer Dryer which is vented through Emission Point AA-034
AA-033	Stud Mill/Topwood Chip Truck Bin Cyclone: Wood waste may be diverted to either AA-011, AA-019b, or AA-033. (Simultaneous operation of AA-011, AA-019b, or AA-033 is not possible or permitted.)
AA-034	Regenerative Thermal Oxidizer (RTO) for VOC control from the Steam-heated Veneer Dryers, Emission Points AA-031 and AA-032
AA-035	97 HP Veneer Dryer Washdown Pump with Diesel Engine (Existing Compression Ignition Stationary Reciprocating Internal Combustion Engine)
AA-036	All Group 1 Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping

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-010	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	PM	4.0 lb/hr and 17.5 TPY
AA-011		3.B.1	PM	4.0 lb/hr and 17.5 TPY *(See AA-019b below)
AA-012		3.B.1	PM	4.0 lb/hr and 17.5 TPY **(See AA-019a below)
AA-015	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	PM	4.0 lb/hr and 8.3 TPY
		3.B.9	Production Limitation	The permittee shall not operate this emission point more than 4,160 hours in any consecutive 12-month period.
AA-016	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and upon issuance of this permit.	3.B.1	PM	4.0 lb/hr and 17.5 TPY
AA-019a		3.B.1	PM	4.0 lb/hr and 17.5 TPY. **(Total Allowable Particulate Emissions from AA-012 and AA-019a combined. Simultaneous operation of AA-012 and AA-019a is not possible or permitted.)
AA-019b		3.B.1	PM	4.0 lb/hr and 17.5 TPY *(Total Allowable Particulate Emissions from AA-011, AA-019b, and AA-033 combined. Simultaneous operation of AA-011, AA-019b, and AA-033 is not possible or permitted.)
AA-033		3.B.1	PM	4.0 lb/hr and 17.5 TPY*(See AA-019b)
AA-020	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	PM	7.0 lb/hr and 14.6 TPY
		3.B.9	Production Limitation	The permittee shall not operate this emission point more than 4,160 hours in any consecutive 12-month period.
AA-023	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999	3.B.1	PM	4.0 lb/hr and 8.3 TPY
		3.B.9	Production Limitation	The permittee shall not operate this emission point more than 4,160 hours in any consecutive 12-month period.

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-024	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	PM	4.0 lb/hr and 17.5 TPY
AA-029a and AA-029b	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1 & 3.B.10	PM	0.12 lb/1000 ft ² of production (3/8" basis), not to exceed 12.1 tons/year (This tons/year limit is the total for both units)
		3.B.1 & 3.B.10	VOC (as Carbon)	0.269 lb/1000 ft ² of production (3/8" basis), not to exceed 27.05 tons/year (This tons/year limit is the total for both units)
		3.B.10	Production Limitation	The permittee shall limit total combined plywood press production to less than 201,150,000 ft ² (3/8" basis) in any consecutive 12-month period.
AA-030	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	NO _x	56.1 lb/hr and 245.7 TPY
	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	VOC	1.2 lb/hr and 5.3 TPY
	NSPS Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart A - General Provisions, and 40 CFR 60, Subpart Db §60.40b	3.B.2	NSPS	General Applicability
	NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD 40 CFR §63.7485, §63.7499, §63.7500(a)(1), and Table 2 of Subpart DDDDD	3.B.3	HAPs	General Applicability
	§§63.7500(a)(3) and 63.7500(f)	3.B.4	General Operating Requirement	See Condition
	40 CFR 60.43b(c)(1)	3.B.5	PM	0.10 lb/MMBTU; not to exceed 14.0 lb/hr and 61.3 TPY

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-030	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.6	SO ₂	4.8 lb/MMBTU
	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 5, 1999.	3.B.1	CO	56.1 lb/hr and 245.7 TPY
	§63.7500(a)(1), Table 2 of Subpart DDDDD	3.B.7	Filterable PM	0.44 lb/MMBTU of heat input or 0.55 lb/MMBTU of steam output
			CO	3,500 ppm by volume on a dry basis corrected to 3 % oxygen, 3-run average (or 900 ppm by volume on a dry basis corrected to 3 % oxygen, 30-day rolling average)
			HCl	0.022 lb/MMBTU of heat input or 0.025 lb/MMBTU of steam output
			Hg	0.0000057 lb/MMBTU of heat input or 0.0000064 lb/MMBTU of steam output
	§63.7500(a)(2) and Table 4 of Subpart DDDDD	3.B.8	Operating Limits	<ul style="list-style-type: none"> a) Maintain opacity to less than or equal to 10 percent b) Operating load not to exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test. c) Operate the oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test
AA-031 and AA-032	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14,	3.B.1 & 3.B.11	PM	0.407 lb/1000 ft ² of production (3/8" basis), not to exceed 42.1 tons/year (This tons/year limit is the total for both units)

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	1994 and October 5, 1999.	3.B.1 & 3.B.11	VOC (as Carbon)	173.4 tons/year (This tons/year limit is the total for both units)
		3.B.11	Production Limitation	The permittee shall limit total combined veneer production to less than 207,050,000 ft ² (3/8" basis) in any consecutive 12-month period.
AA-031, AA-032, AA-034, and AA-036	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD.	3.B.12	HAPs	General Applicability
AA-031, AA-032, and AA-034	National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD.	3.B.13	HAPs	Reduce emission of total HAPs measured as THC, by 90%
		3.B.15	Temperature	3-hour block average of firebox temperature shall be greater than or equal to the minimum temperature established during the most recent performance test
		3.B.14	General Operations Requirement	See Condition
		3.B.16	Operating Requirement	See Condition
AA-035	National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and General Provisions (40 CFR 63, Subpart A); 40 CFR 63.6602 Table 2c	3.B.17	HAP's	Maintenance Requirements
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.6	SO ₂	4.8 lb/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.B.18	PM	0.6 lbs/MMBTU

3.B.1 The permittee shall comply with the Emission Limitations and Standards established in the Federally-Enforceable Construction permit issued on October 26, 1993 and modified on October 14, 1994, October 5, 1999, and upon issuance of this permit.

- 3.B.2 Emission Point AA-030, the Bigelow Model K Woodwaste Boiler is subject to and shall comply with the New Source Performance Standards (NSPS), 40 CFR 60, Subpart A - General Provisions, and 40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. (Ref.: 40 CFR 60.40b)
- 3.B.3 Beginning January 31, 2017 or upon certification of compliance, Emission Point AA-030 is subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD.

Emission Point AA-030 is an existing large boiler that is in the “hybrid suspension/grate burner designed to burn wet biomass/bio-based solid” fuel subcategory. The permittee shall comply with all applicable Emission Limitations for such a unit found in Table 2 of Subpart DDDDD. (Ref.: 40 CFR §63.7485, §63.7499, §63.7500(a)(1), and Table 2 of Subpart DDDDD)

- 3.B.4 Beginning January 31, 2017 or upon certification of compliance, the permittee shall operate and maintain Emission Point AA-030, including any associated pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

For Emission Point AA-030, the emission limits, work practice standards, and operating limits apply at all times the emission point is in operation, except during startup and shutdown during which time the permittee shall comply with Condition 3.D.5 of this permit. (Ref.: 40 CFR §63.7500(a)(3), § 63.7500(f), and §63.7505(a))

- 3.B.5 For Emission Point AA-030, the permittee shall not cause to be discharged into the atmosphere any gases that contain PM in excess of 43 ng/J (0.10 lb/million Btu) heat input. (Ref.: 40 CFR 60.43b(c)(1))
- 3.B.6 For Emission Points AA-030 and AA-035, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.B.7 Beginning January 31, 2017 or upon certification of compliance, emissions from Emission Point AA-030 shall not exceed:
- (a) Filterable PM - 0.44 lb/MMBtu of heat input or 0.55 lb/MMBTU of steam output
 - (b) CO – 3,500ppm @ 3% O₂ or 3.5 lbs /MMBTU of steam output
 - (c) HCl - 0.022 lb/MMBtu of heat input or 0.025 lb/MMBTU of steam output

- (d) Mercury – 0.0000057 lb/MMBtu of heat input or 0.0000064 lb/MMBTU of steam output.

(Ref.: 40 CFR §63.7500(a)(1) and Table 2 of Subpart DDDDD)

3.B.8 Beginning January 31, 2017 or upon certification of compliance, Emission Point AA-030 shall meet the following operating limits from Table 4 of Subpart DDDDD that are applicable:

- (a) Maintain opacity to less than or equal to 10 percent opacity or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM emission limitation (daily block average).
- (b) Maintain the daily 30-Day average operating load so that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test.
- (c) Operate the oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test according to Table 7 of Subpart DDDDD.

(Ref.: 40 CFR 60.43b(f), 40 CFR 63.7500(a)(2), 63.7525(a)(7) and Items 6,7, and 8 of Table 4)

3.B.9 For Emission Points AA-015, AA-020, and AA-023, the permittee shall not operate any individual emission point more than 4,160 hours per year in any consecutive 12-month period. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 5, 1999)

3.B.10 For Emission Points AA-029a and AA-029b, the permittee shall limit total combined plywood press production to less than 201,150,000 ft² (3/8" basis) in any consecutive 12-month period. Total combined ton/year PM emissions from Emission Points AA-029a and AA-029b shall not exceed 12.1 tons/year. Total combined ton/year VOC emissions from Emission Points AA-029a and AA-029b shall not exceed 27.05 tons/year. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 5, 1999)

3.B.11 For Emission Points AA-031 and AA-032, the permittee shall limit total combined veneer production to less than 207,050,000 ft² (3/8" basis) in any consecutive 12-month period. Total combined ton/year PM emissions from Emission Points AA-031 and AA-032 shall not exceed 42.1 tons/year. Total combined ton/year VOC emissions from Emission Points AA-031 and AA-032 shall not exceed 173.4 tons/year. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 5, 1999)

- 3.B.12 Emission Points AA-031, AA-032, AA-034, and AA-036 are affected by and shall comply with the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD and the General Provisions, 40 CFR Part 63, Subpart A. (Ref.: 40 CFR 63.2231)
- 3.B.13 For Emission Points AA-031 and AA-032, the permittee shall reduce emissions of Total HAP's, measured as THC, by 90%. The permittee may also choose to comply with any of the other compliance options listed in Table 1B of Subpart DDDD provided the permittee provides the DEQ with proper notice of such intent. (Ref: 40 CFR 63.2240(b) and Table 1B of Subpart DDDD)
- 3.B.14 The permittee shall be in compliance with the following general compliance requirements:
- (a) The permittee shall be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CR 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.
 - (b) The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(3)(1)(i).
 - (c) The permittee shall develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3).
- (Ref.: 40 CFR 63.2250)
- 3.B.15 For Emission Point AA-034, the permittee shall maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test. (Ref.: 40 CFR 63, Subpart DDDD, Table 2)
- 3.B.16 For Emission Point AA-034, the compliance options and operating requirements for the RTO will not apply while a routine control device maintenance activity requiring the control device to be taken off-line is being done. The permittee's request and list of maintenance activities is contained in Appendix C of this permit. The total downtime of the control device allowed under this exemption is limited to less than 0.5 percent of the annual operating uptime. The permittee shall make every effort to initiate and complete

maintenance activities during any scheduled downtime. (Ref.: 40 CFR §63.2251)

3.B.17 Emission Point AA-035 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

- a) Emission Point AA-035 is an existing compression ignition (CI) stationary RICE with a site rating less than 500 brake HP and must comply with the following requirements except during periods of startup:
 - 1) Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
 - 2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. (Ref.: 40 CFR 63.6602 and Table 2c of Subpart ZZZZ)

3.B.18 For Emission Point AA-035, 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

- 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

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	$E = 4.1p^{0.67}$

pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

D. Work Practice Standards

3.D.1 For Emission Points AA-031 and AA-032, the permittee shall minimize fugitive

Emission Point(s)	Applicable Requirement	Condition Number(s)	Limit/Standard
AA-031 and AA-032	40 CFR 63.2241 and MACT Subpart DDDD Table 3	3.D.1	Minimize fugitive emissions
AA-036	40 CFR 63.2241 and Table 3 of Subpart DDDD	3.D.2	Use only non-HAP containing coatings
AA-030	40 CFR §63.7510(e), §63.7575 and Item 4 of Table 3 in Subpart DDDDD	3.D.3	One-time Energy Assessment
	40 CFR §63.7510(e), §63.7515(d), §63.7540(a)(10) and Table 3 of Subpart DDDDD	3.D.4	Initial and Subsequent Tune-ups
	40 CFR 63, Subpart DDDDD §63.7500 and Items 5 and 6 of Table 3	3.D.5	Startup and shutdown conditions

emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts). (Ref.: 40 CFR 63.2241 and MACT Subpart DDDD Table 3)

3.D.2 For Emission Point AA-036, the permittee shall only use non-HAP containing coatings in all Group 1 Miscellaneous Coating operations. (Ref.: 40 CFR 63.2241 and Table 3 of Subpart DDDD)

3.D.3 For Emission Point AA-030 the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in §63.7575 by January 31, 2017 or by certification of compliance. An energy assessment that has been completed after January 1, 2008, that meets or is amended to meet the energy assessment requirements listed in (a) through (h) below satisfies the energy assessment requirement. The energy assessment must include all data elements listed in (a) through (h) below with the extent of the evaluation for items (a) through (e) being appropriate for the on-site technical hours specified for an energy assessment in §63.7575.

- (a) A visual inspection of the boiler or process heater system.
- (b) An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- (c) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.
- (d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.

- (e) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
- (f) A list of cost-effective energy conservation measures that are within the facility's control.
- (g) A list of the energy savings potential of the energy conservation measures identified.
- (h) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
(Ref.: 40 CFR §63.7510(e), §63.7575 and Item 4 of Table 3 in Subpart DDDDD)

3.D.4 For Emission Point AA-030 the permittee shall complete an initial tune-up in accordance with (a) through (f) below by January 31, 2017 or by certification of compliance. The subsequent required tune-ups identified below shall also be in accordance with (a) through (f) below.

Beginning January 31, 2017 or upon certification of compliance, the subsequent tune-ups for Emission Point AB-030 shall be conducted annually, with each tune-up being completed no more than 13 months after the previous tune-up. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (f) Maintain on-site and submit, if requested by the DEQ, an annual report containing the information in paragraphs (a)(10)(vi)(A) through (C) of this section.

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

3.D.5 Beginning January 31, 2017 or upon certification of compliance, for Emission Point AA-030, the permittee shall operate the boiler in accordance with the requirements found in (a) through (e) during periods of startup and shutdown.

- a) All CMS must be operated during startup and shutdown.
- b) Clean dry biomass as defined in §63.7575 must be used for startup.
- c) Emissions must be vented to the main stacks and all control devices must be engaged if the permittee starts burning non-clean biomass during startup or shutdown.
- d) Monitoring data must be collected during periods of startup and shut down as specified in §63.7535(b).
- e) All applicable records required by Condition 5.B.7 (i) and (j) must be kept during periods of startup and shutdown.

(Ref.: 40 CFR §63.7500(f), §63.7540(d), § 63.7555(i) and (j) and Items 5 and 6 of Table 3 of Subpart DDDDD)

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;
 - (a) the compliance status;
 - (b) whether compliance was continuous or intermittent;
 - (c) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (d) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)
- 4.3 Emission Point AA-030 is subject to and must comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD, by January 31, 2017.
- 4.4 For Emission Point AA-030, the permittee shall submit a Compliance Plan no later than July 31, 2016, to be attached as Appendix D of this permit per the modification procedures outlined in 11 Miss. Admin. Code Pt. 2, Ch. 6. The Compliance Plan shall address in detail all applicable emission limitations, work practice standards, operating limits, monitoring, recordkeeping and reporting requirements under Subpart DDDDD. Upon renewal of the operating permit, all applicable requirements shall be incorporated into the body of the permit.

Any request to use an alternative method (when allowed under the part), shall be submitted to the DEQ for approval before including the alternative in the Compliance Plan. Any request for an alternative to this standard not delegated to the DEQ under §63.7570 must be approved by the EPA.

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)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-030	Opacity	Installing CMS for opacity	5.B.1	40 CFR60.48b(a)
	PM, CO, NO _x , HCl and Hg	Initial Compliance/ Stack Testing	5.B.2	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 1, 1999, Title V Operating Permit issued April 10, 2006, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).
	VOC and NO _x	Stack Testing once every 3 years		40 CFR 63.7510(a)(1),(3), and (4), 63.7515(a) and (b), 63.7520(a),(b),(c),(d),and(e),63.7530(a)and(b), 63.7545(d), and Table 5 of Subpart DDDDD
	CMS	Develop a site-specific monitoring plan for any CMS	5.B.3	40 CFR 63.7505(d)
	CO	Installing an oxygen analyzer system	5.B.4	40 CFR 63.7525(a) and 63.7575
	COMS	Installing and operating COMS	5.B.5	40 CFR 63.7525(c)(1)-(7)
	PM, CO, HCl, Hg and Opacity	Continuous compliance	5.B.6	40 CFR 63.7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8 of Subpart DDDDD
		Recordkeeping	5.B.7	40 CFR §63.7555, §63.7560 and §63.10(b)(2)
AA-010 AA-015 AA-016 AA-020 AA-024	Opacity	The permittee shall perform weekly opacity observations which may include a VEE.	5.B.8	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-015, AA-020, and AA-023	Hours of operation	The permittee shall monitor and document with recordkeeping the hours of operation each day, and the 12-month rolling total.	5.B.9	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).
AA-010 through AA-024, AA-030	Weekly inspections	The permittee shall perform weekly inspections of the air pollution control equipment. Maintenance shall be performed as necessary. Records shall be maintained on site.	5.B.10	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).
AA-010 through AA-024 And AA-033	PM	The permittee shall monitor PM emissions and opacity by stack testing in accordance with EPA reference Methods 1-5 and 9, respectively, or approved equivalent methods, during the third calendar quarter of 2014, and biennially thereafter.	5.B.11	Title V Operating Permit issued April 10, 2006 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).
AA-029a and AA-029b	Press Production	The permittee shall monitor with recordkeeping daily and monthly production (3/8" basis) for each plywood press. These records shall be kept in log form at the facility and made readily available upon request by the Office of Pollution Control.	5.B.12	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).
AA-031 and AA-032	Veneer Dryer Production	The permittee shall monitor with recordkeeping daily and monthly production (3/8" basis) from each veneer dryer. These records shall be kept in log form at the facility and made readily available upon request by the Office of Pollution Control.	5.B.13	Federally-Enforceable Construction Permit of October 26, 1993, modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
		Performance Tests	5.B.14 5.B.17	§63.2261(a) §63.2262
		Recordkeeping	5.B.19 5.B.20	§63.2282(a),(b) §63.2283(a),(b),(c)
		Startup, Shutdown, and Malfunction Plan(SSMP)	5.B.21 5.B.22	§63.2250(c) §63.2271 (b)(1))
AA-031 AA-032 and AA-036	HAP	Continuous Compliance	5.B.18	§63.2271(a)
AA-031 AA-032	Hours of Operation	Monitoring, Recordkeeping, and Reporting for control device downtime in association with the RCDME (See Appendix D)	5.B.23	§63.2251
AA-035	HAP	Monitoring, Recordkeeping and Reporting	5.B.24	40 CFR 63.6605, 63.6625(e),(h),and (i) and 63.6640
		Monitoring, Recordkeeping and Reporting	5.B.25	40 CFR 63.6655(e) and 63.6660

- 5.B.1 For Emission Point AA-030, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system (Ref. 40 CFR 60.48b(a))
- 5.B.2 For Emission Point AA-030, the permittee shall demonstrate initial compliance with the PM, CO, HCl and Hg limitations by stack testing, establishing operating limits, and conducting COMS evaluations. Stack testing must be performed in accordance with the requirements in 40 CFR 63.7520 and Table 5 of Subpart DDDDD. The permittee shall conduct the testing within 180 days of the compliance date provided in the notification submitted to MDEQ as required in Condition 5.C.3 but no later than **July 29, 2017**, and submit the test report no later than sixty days after the testing is complete. The operating limits must be established during performance test(s). The COMS performance evaluations must be conducted according to Condition 5.B.5. The permittee shall submit data on the operating load conditions, including steam flow rate and oxygen concentration in the firebox, observed during each of the performance test runs. This data will be used to set the allowable 30-day average operating load in accordance with Condition 5.B.6(d) and the minimum allowable oxygen trim system set point in accordance with Condition 3.B.8(c).

If the performance tests for a given pollutant (PM, CO, HCl and Hg) for at least 2 consecutive years show that emissions are at or below 75 percent of the emission limit

for the pollutant, and if there are no changes in the operation of the individual boiler or air pollution control equipment that could increase emissions, the permittee may choose to conduct performance tests for the pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test.

The permittee shall monitor VOC and NO_x emissions by stack testing in accordance with the appropriate methods and procedures given in EPA Reference Method 25 and 7 or approved equivalent methods. The permittee shall monitor the VOC and NO_x emissions by stack testing during the second calendar quarter of 2018 and once every three years thereafter. In the event that VOC and/or NO_x testing is conducted when MACT parameter testing is not required, testing shall be performed while the boiler is operating at peak load conditions. For the purposes of the compliance demonstration, peak load conditions shall be identified as within 20% of the maximum rated capacity of the source.

Where VOC and/or NO_x testing coincides with MACT parameter testing, this requirement is not applicable as future allowable operating rates will be set based upon 110% of the highest hourly performance test operating loads, in accordance to Condition 5.B.2 and Condition 5.B.6(d).

The permittee must develop a site-specific test plan according to the requirements in 40 CFR 63.7(c) and upon request make available to MDEQ any records necessary to determine the conditions of the performance tests.

The permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

(Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 1, 1999, Title V Operating Permit issued April 10, 2006, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).; 40 CFR 63.7510(a)(1),(3), (4) and (e), 63.7515(a) and (b), 63.7520(a), (b), (c), (d), and (e), 63.7530(a) and (b), 63.7545(d), and Table 5 of Subpart DDDDD and Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 1, 1999, Title V Operating Permit issued April 10, 2006, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2))

- 5.B.3 For Emission Point AA-030, the permittee must develop a site specific monitoring plan according to the requirements listed in §63.7505(d)(1) through (4). (Ref.: 40 CFR 63.7505(d))
- 5.B.4 For Emission Point AA-030, the permittee shall install, operate, and maintain an oxygen analyzer system (including oxygen trim system) or install, certify, operate and maintain continuous emission monitoring systems for CO and oxygen (or carbon dioxide (CO₂)) according to the procedures in paragraphs (a)(1) through (6) of 40 CFR 63.7525(a). (Ref.: 40 CFR 63.7525(a) and 63.7575)
- 5.B.5 Beginning January 31, 2017 or upon certification of compliance, for Emission Point AA-882 PER20100001

030, the permittee must install, operate and maintain the COMS according to the requirements listed in (a) through (h) of this Condition:

- (a) Install, operate and maintain the COMS according to Performance Specification 1 at appendix B to part 60 of this Chapter.
- (b) Conduct a performance evaluation of the COMS according to the requirements in §63.8(e) and according to Performance Specification 1 at appendix B to part 60 of this Chapter.
- (c) For the COMS complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle data recording for each 6-minute period
- (d) Reduce the COMS data as required by §63.8(g)(2).
- (e) Include in your site-specific monitoring plan procedures and acceptance criteria for operating and maintaining the COMS according to the requirements in §63.8(d). The minimum data the plan can include is a daily calibration drift assessment, a quarterly performance audit and an annual zero alignment audit of the COMS.
- (f) Operate and maintain the COMS according to the requirements in the monitoring plan and the requirements of §63.8(e).
- (g) Identify periods the COMS is out of control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit. Any 6-minute period for which the monitoring system is out of control and the data is not available for a required calculation, constitutes a deviation from the monitoring requirements.
- (h) Determine and record all 6-minute averages (daily block averages are applicable) collected for periods during which the COMS is not out of control.

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

5.B.6 For Emission Point AA-030, the permittee shall demonstrate continuous compliance with the emission limits in Condition 3.B.7, the work practice standards in Condition 3.D.4 and the operating limits in Condition 3.B.8 according to the applicable methods listed in (a) through (h) of this Condition and specified in Table 8 of Subpart DDDDD and §63.7540.

- (a) Collect the opacity monitoring system data according to Condition 5.B.5. Reduce this data to a 6 minute average and maintain the daily block average opacity to less than

or equal to 10 percent or the highest hourly average opacity reading measured during the most recent performance test according to Condition 5.B.2.

- (b) Operate the oxygen analyzer system on the boiler according to Condition 3.B.8
- (c) Collect the operating load data every 15 minutes.
- (d) Reduce the data to a 30-day rolling average and maintain the 30-day rolling average operating load such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test according to Condition 5.B.2.
- (e) After the initial compliance demonstration is completed, operation above the established maximum or below the established minimum operating limit is a deviation of established operating limits listed in Condition 3.B.8 except during performance tests conducted to determine compliance with the emission limits or to establish new operating limits. Operating limits must be confirmed and reestablished during performance tests.
- (f) As specified in Condition 5.B.7, you must keep records of the type and amount of all fuels burned in the boiler during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in equal to or lower fuel input of chlorine, mercury, and TSM than the maximum values calculated during the last performance test.
- (g) Conduct a tune-up in accordance with Condition 3.D.4
- (h) Report each instance in which the boiler did not meet the emission limits and operating limits in Conditions 3.B.7 and 3.B.8. These instances are considered deviations and as such must be reported according to the requirements of Condition 5.A.5.

(Ref.: 40 CFR 63. 7540(a)(1),(2)(ii), and(10) and (b), Items 1 and 10 of Table 8 of Subpart DDDDD)

5.B.7 Beginning January 31, 2017 or upon certification of compliance, for Emission Point AA-030, the permittee must keep all applicable records that are required in (a) through (k) below:

- (a) Boiler steam flow records
- (b) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting and Initial Notification and Notification of

Compliance Status or semiannual compliance report you submitted according to the requirements in §63.10(b)(2)(xiv).

- (c) Records of performance tests and other compliance demonstrations and performance evaluations as required by §63.10(b)(2)(xiv)
- (d) For each CEMS, COMS, and continuous monitoring system you must keep records according to paragraphs (1) through (3) of this section.
 - (1) Records described in §63.10(b)(2)(vii) through (xi)
 - (2) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3)
 - (3) Records of the date and time when each deviation started and stopped.
- (e) Keep the records required by Condition 5.B.6 including records of all monitoring data and calculated averages for applicable operating limits, such as opacity and operating load, to show continuous compliance with each emission limit and operating limit that applies to you.
- (f) Keep records of daily fuel use by the boiler, including the types of fuel and amount used.
- (g) Records of the occurrence and duration of each malfunction of the boiler and or the associated air pollution control equipment.
- (h) Records of actions taken during periods of malfunction to minimize emissions in accordance with general duty to minimize emissions in §63.7500(a)(3), including corrective actions to restore the malfunctioning boiler, air pollution controls or monitoring equipment to normal or usual manner of operation.
- (i) Maintain records of the calendar date, time, occurrence, and duration of each startup and shutdown.
- (j) Maintain records of the types and amounts of fuels used during startup and shutdown.
- (k) Retain the required records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified

October 14, 1994 and October 1, 1999, 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2), 40 CFR §63.7555, §63.7560 and §63.10(b)(2))

- 5.B.8 For Emission Points AA-010, AA-015, AA-016, AA-020, and AA-024, the permittee shall assure compliance with the opacity limitations (40%) by conducting weekly visible emissions observations during daylight hours. These observations shall be performed for a six (6) minute period on each stack, but may be conducted from a location allowing the observation of multiple emission points simultaneously. In the event that no visible emissions are observed, no further action is required beyond documentation of the observation. If any visible emissions (not including condensed water vapor) are observed, a Visible Emissions Evaluation (VEE) using EPA Reference Method 9 shall be conducted by a certified observer for a minimum of six (6) consecutive minutes (24 observations at 15 second intervals). Records of these readings shall be maintained on a VEE log sheet. If the VEE results in visible emissions greater than 10%, then another VEE shall be performed within the hour of the initial VEE. The secondary VEE shall be performed for eighteen (18) consecutive minutes, and opacity readings shall be determined on a six (6) consecutive minute rolling basis. If the highest six (6) minute average of the visible emissions (not including condensed water vapor) during this period is above 20% opacity, the permittee shall initiate corrective action immediately that minimizes the visible emissions. If the corrective action within 24 hours does not result in visible emissions below 10% being observed from the emission point, the permittee shall notify DEQ in writing within five (5) working days. Further, the permittee shall continue to conduct VEE's for 30 consecutive minutes once per daylight shift until the corrective action rectifies the opacity problem. Should this opacity problem continue beyond 5 days the permittee shall demonstrate compliance with the PM emission limitations by stack testing according to EPA Reference Methods 1-5 and submittal of a stack test report within 120 days of DEQ's receipt of the permittee's letter.

If conditions are such that opacity readings cannot be taken using EPA Reference 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 summary report in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.9 For Emission Points AA-015, AA-020, and AA-023, the permittee shall monitor and document with recordkeeping the hours of operation each day, and the 12-month rolling total. The records for the previous five (5) year period shall be maintained at the facility and made available to the Office of Pollution Control upon request. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.10 For Emission Points AA-010 through AA-024, and AA-030, 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.11 For Emission Points AA-010 through AA-024 and AA-033, the permittee shall monitor PM emissions and opacity by stack testing in accordance with EPA Reference Methods 1-5 and 9, respectively, or approved equivalent methods, during the 3rd calendar quarter of 2014, and biennially thereafter. The particulate matter and opacity testing shall be performed simultaneously and while the sources are operating 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. During stack testing, the permittee shall monitor process throughput in order to determine compliance with the applicable requirements. Upon request by the company, the Office of Pollution Control may approve representative testing of similar emission sources at the facility on an alternating basis for each biennial testing period. Any such request shall be included with the submittal of the testing protocol required by Paragraph 5.C.2. Approval must be obtained prior to testing. (Ref.: Title V Operating Permit issued April 10, 2006, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.12 For Emission Point AA-029a and AA-029b, the permittee shall monitor with recordkeeping daily and monthly production (3/8" basis) for each plywood press. These records shall be kept in log form at the facility and made readily available upon request by the Office of Pollution Control. The permittee shall maintain these records for at least five (5) years following the date of such record. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.13 For Emission Points AA-031 and AA-032, the permittee shall monitor with recordkeeping daily and monthly production (3/8" basis) for each veneer dryer. These records shall be kept in log form at the facility and made readily available upon request by the Office of

Pollution Control. The permittee shall maintain these records for at least five (5) years following the date of such record. (Ref.: Federally Enforceable Construction Permit of October 26, 1993 and modified October 14, 1994 and October 1, 1999, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.14 For Emission Point AA-034, the permittee shall conduct any required performance tests in accordance with 63.2262 of Subpart DDDD. (Ref.: 40 CFR §63.2262)

5.B.15 For Emission Point AA-034, the permittee shall install, operate and maintain the continuous parameter monitoring system (CPMS) in accordance with the following:

- (a) the CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period;
- (b) the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment; and,
- (c) record the results of each inspection, calibration, and validation check.

(Ref.: 40 CFR 63.2269 (a))

5.B.16 For Emission Point AA-034, the permittee shall install, operate, and maintain each temperature monitoring device in accordance with the following:

- (a) Locate the temperature sensor in a position that provides a representative temperature;
- (b) use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger;
- (c) if using a chart recorder, sensitivity must have minor divisions not more than 20 °F;
- (d) perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following an electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading;
- (e) conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and,

- (f) at least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(Ref.: 40 CFR 63.2269(b))

5.B.17 Emission Point AA-034, the permittee shall establish the thermal oxidizer operating requirements using the following procedures:

- (a) During the performance test, the permittee shall continuously monitor the firebox temperatures during each of the required 1-hour test runs. For the regenerative thermal oxidizers, you may measure the temperature in multiple locations (e.g., one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purpose of establishing your minimum firebox temperatures. The minimum firebox temperatures must be then established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs. Multiple three run performance tests may be conducted to establish a range of parameter values under different operating conditions.
- (b) The permittee may establish a different minimum firebox temperature for the thermal oxidizer by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in Condition 3.B.12(a) of this permit that demonstrates compliance with the applicable compliance options of Subpart DDDD.

(Ref.: 40 CFR 63.2262)

5.B.18 The permittee shall demonstrate continuous compliance with the work practice standards outlined in Condition 3.D.1 by documenting that the facility is following the facility's plan for minimizing emissions that was submitted with the Notification of Compliance Status as required in 40 CFR 63.2265.

The permittee shall demonstrate continuous compliance with the work practice standard outlined in Condition 3.D.2 by continuing to use non-HAP coatings and by keeping records showing that non-HAP coatings are being used. (Ref.: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD)

5.B.19 For Emission Points AA-031, AA-032 and AA-034, the permittee shall keep a copy of the following records:

- (a) A copy of each notification and report submitted to comply with Subpart DDDD, including all documentation used to support the Initial Notification or the Initial Notification of Compliance Status.

- (b) A copy of each record required in Table 8 of Subpart DDDD to document continuous

compliance with each applicable work practice standard.
(Ref. 63.2282(a) and (b))

- 5.B.20 A copy of the records required in Condition 5.B.19 must be kept for a period of five years. Each record must be kept on site for a period of 2 years from the date it was created or obtained. The records can be kept offsite for the remaining 3 years. All records must be kept in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1) and Condition 5.A.3. (Ref: 63.2283(a) through (c))
- 5.B.21 For Emission Point AA-034, the permittee shall report all required information from 63.2281(c)(1) through (6) and 63.2281(e)(1) through (11) for the following information for any deviation by the temperature monitoring sensor. This includes periods of startup, shutdown, and malfunction. (Ref.: 40 CFR 63.2281(e) and Table 9 of Subpart DDDD)
- 5.B.22 The permittee shall submit an immediate report for any startup, shutdown, or malfunction if there is a startup, shutdown, or malfunction during the reporting period that is not consistent with the SSMP required in Condition 3.B.14 (c). This report shall include all actions taken as a result of the event and shall be sent to the MDEQ within two working days after starting actions inconsistent with the SSMP. All information required in 63.10(d)(5)(ii) shall be submitted to MDEQ within seven working days after the end of the event. (Ref.: 40 CFR 63.2281(e) and Table 9 of Subpart DDDD)
- 5.B.23 For Emission Points AA-031, AA-032, and AA-034, the permittee shall monitor and document with recordkeeping the hours of operation of each emissions unit each day, the hours of operation of each unit under the Routine Control Device Maintenance Exemption, and the 12-month rolling totals of each. The records for the previous (5) year period shall be maintained at the facility and made available to the Office of Pollution Control upon request. (Ref.: 40 CFR 63.2251).
- 5.B.24 For Emission Point AA-035, the permittee shall comply with the following monitoring, operating, maintenance requirements:
- (a) Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;
 - (b) The permittee may utilize an oil analysis program in order to extend the specified oil change requirements from Condition 3.B.15(a)(1) provided the analysis analyzes the parameters identified in 63.6625(i).

(Ref.: 40 CFR 63.6605, 40 CFR 63.6625(e),(h), and (i) and 63.6640)

- 5.B.25 For Emission Point AA-035, the permittee shall maintain all maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in 5.B.27(a) and keep each readily accessible for at least five years after the date of each occurrence. (Ref.: 40 CFR 63.6655(e) and 40 CFR 63.6660)

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-030		Notification of Compliance Status	5.C.1	40 CFR §63.7530(e) and §63.7545(e)(1) through(8)
		Submit a semi-annual report	5.C.2	40 CFR §63.7550(a),(b),(c), (d), and (h) and Table 9 of Subpart DDDDD
		Compliance extension	5.C.3	40 CFR 63.6(i)(4)(i)(C) and Compliance Extension Approval Letter in Appendix B
		Annual compliance report	5.C.4	40 CFR 63.7550(a),(b), and (c)(1) and Table 9 of Subpart DDDDD
AA-010 through AA-034		Submit a test protocol	5.C.5	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
		Submit test results	5.C.6	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2)
AA-031, AA-032, AA-036		Report deviation from work practice standards	5.C.9	40 CFR 63.2271(b)
AA-034		Submit a report of any startup, shutdown, or malfunction inconsistent with the SSMP.	5.C.10	40 CFR 63.2281(a) and Table 9 of Subpart DDDD

- 5.C.1 For Emission Point AA-030, the permittee shall submit a Notification of Compliance Status to MDEQ, by the end of the 60th day following the completion of all performance tests required by Condition 5.B.2. The Notification of Compliance Status report must include the following (a) through (i):

- (a) A description of the affected unit including identification of which subcategory the unit is in, the design heat input capacity of the unit, and description of the fuel burned in the unit.
- (b) Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance including all established operating limits, and including:

- (1) Identification of whether you are complying with the PM emission limit or the alternative TSM emission limit.
- (2) Identification of whether you are complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.
- (c) A summary of the maximum CO emission levels recorded during the performance test to show that the permittee has met the applicable emission standard.
- (d) Identification of whether the permittee plans to demonstrate compliance with each applicable emission limit through performance testing or CEMS
- (e) If there was a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
- (f) A certification stating "This facility has met all applicable emission limits and work practice standards."
- (g) A certification stating "This facility has had an energy assessment performed according to the procedures listed in Condition 3.D.3."
- (h) A certification stating "This facility complies with the required tune-up according to procedures listed in Condition 3.D.4."
- (i) A certification stating "No secondary materials that are solid waste were combusted in the affected unit." (Ref.: 40 CFR §63.7530(e) and §63.7545(e)(1) through(8))

5.C.2 Beginning January 31, 2017, for Emission Point AA-030, the permittee shall submit the information listed in (a) through (n) in accordance with the semi-annual reporting requirements listed in Condition 5.A.4 of this permit.

- (a) Company and Facility name and address
- (b) Process unit information, emission limits and operating limits
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The total operating time during the reporting period
- (e) The total fuel use by the boiler within the reporting period, including but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the permittee's basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.

- (f) If the permittee is conducting performance test every 3 years in accordance with Condition 5.B.2, the date of the last two performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
- (g) Statement indicating that the permittee has burned no new types of fuel in the boiler.
- (h) If there are no deviations from any emission limits and operating limits from Conditions 3.B.8 and 3.B.9 , a statement that there were no deviations from the emission limits and operating limits during the reporting period.
- (i) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period that may have caused an emission limit to be exceeded. Also, include a description of any actions taken by the permittee during the malfunction of the boiler or air pollution control devices to minimize emissions in accordance with Condition 3.B.4, including what actions were taken to correct the malfunction
- (j) For every instance of startup or shutdown include the information required to be monitored, collected, or recorded by Condition 5.B.7 (i) and (j).
- (k) For each deviation from an emission limit or operating limit the compliance report must additionally contain:
 - (1) A description of the deviation and which emission limit or operating limit from which you deviated
 - (2) Information on the number, duration, and cause of deviations (including unknown cause) and the corrective action taken.
 - (3) If the deviation occurs during an annual performance test, provide the date the annual performance test was completed.
- (l) If there are no periods during which the COMS were out of control as specified in Condition 5.B.5, a statement that there were no periods during the reporting period during which the COMS were out of control during the reporting period
- (m) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report
- (n) Results of any performance tests, fuel analyses, and compliance reports identified in 40 CFR §63.7550(h)(1) through (3) shall be submitted to EPA's WebFIRE database

using the Compliance and Emissions Data Reporting Interface that can be accessed through EPA's Central Data Exchange (CDX – www.epa.gov/cdx). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due then the report must be submitted to MDEQ. (Ref.: 40 CFR §63.7550(a),(b),(c), (d), and (h) and Table 9 of Subpart DDDDD)

5.C.3 For Emission Point AA-030, a compliance extension was granted by MDEQ on June 4, 2015, extending the compliance date for Subpart DDDDD to January 31, 2017, contingent on the permittee completing (a) through (c) below:

- (a) Submit information detailing any and all construction activities necessary to comply with Subpart DDDDD in accordance with Condition 5.A.4. This information shall include all construction activities that have occurred in the previous six months and shall begin June 4, 2015.
- (b) Provide our office with a notification of the date construction is completed within 5 days of such date.
- (c) Provide our office with a notification of the date the boiler achieves compliance within 5 days of such date. The compliance extension for the boilers expires once this notice is provided to MDEQ.

(Ref.: 40 CFR 63.6(i)(4)(i)(C) and Compliance Extension Approval Letter in Appendix B)

5.C.4 Beginning January 31, 2017 or upon certification of compliance, for Emission Point AA-030, the permittee shall submit the information listed in (a) through (e) below in accordance with the annual compliance certification required by Condition 4.2 of this permit upon completion of each required tune-up identified in Condition 3.D.4.

- (a) Company and Facility name and address
- (b) Process unit information, emissions limitations, and operating parameter limitations
- (c) Date of report and beginning and ending dates of the reporting period
- (d) The total operating time during the reporting period
- (e) Include the date of the most recent tune-up for the emission point. Include the date of the most recent burner inspection if it was not performed at the required frequency and was delayed until the next scheduled or unscheduled unit shutdown (Ref.: 40 CFR 63.7550(a),(b), and (c)(1) and Table 9 of Subpart DDDDD)

- 5.C.5 For Emission Points AA-010 through AA-034, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days notice so that an observer may be afforded the opportunity to witness the test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.C.6 For Emission Points AA-010 through AA-034, the permittee shall submit a test report of the results of the stack tests required by Paragraphs 5.B.8 and 5.B.12 each within sixty (60) days of the individual test dates. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.C.7 A written notification of intent to conduct a performance test must submitted at least 60 calendar days before the performance test is scheduled to begin as specified in §63.7(b)(1) of Subpart A. (Ref: 40 CFR 63.2280(c))
- 5.C.8 The compliance report must contain the information in paragraphs §63.2281(c)(1) through (8) that specifically applies to the facility. (Ref: 40 CFR 63.2281(c))
- 5.C.9 For Emission Points AA-031, AA-032 and AA-036, the permittee shall report each deviation (or instance of noncompliance) with the work practice standards identified in Conditions 3.D.1 and 3.D.2 according to the requirements in §63.2281 of Subpart DDDD. (Ref: 40 CFR 63.2271(b))
- 5.C.10 For Emission Point AA-034, the permittee shall submit to MDEQ, within 7 working days after the end of the event, a written report of any startup, shutdown, or malfunction that occur during the reporting period, and was inconsistent with the SSMP. The written report should contain the requirements listed in 40 CFR 63.10(d)(5)(ii). (Ref: 40 CFR 63.2281(a) and Table 9 of Subpart DDDD)
- 5.C.11 The permittee must submit a compliance report semiannually according to the requirements in §63.2281(b) of 40 CFR Part 63, Subpart DDDD and Condition 5.A.4 of this permit. (Ref: 40 CFR 63.2281(a))

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.

- 5.1 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.
- 5.2 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.
- 5.3 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.
- 5.4 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.

- 5.5 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.
- 5.6 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
 - (a) 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
CAM	Compliance Assurance Monitoring
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