

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Weyerhaeuser NR Company, Columbus Modified Fiber Facility
371 Manufacturers Drive
Columbus, Mississippi
Lowndes County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: NOV 08 2016

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: OCT 31 2021

Permit No.: 1680-00029

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SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
 - (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title

V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.)
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air

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

- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)
- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)
- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)
- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee

submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the

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

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

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

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

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

cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

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

- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other

requirements in the permit; and

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

requirement.

(b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)

(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:

- (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
- (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
- (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.

(2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.

(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

(1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
- (ii) the source was at the time being properly operated;
- (iii) during the maintenance the permittee took all reasonable steps to minimize

levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
- (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.

- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The first stage dryer consisting of four natural gas fired burners with a total rated capacity of 128 MMBTU/hr equipped with a cyclone and scrubber
AA-002	The manufacturing process equipped with a cooling cyclone
AA-004	The continuous house vacuum system #1 with a cyclone and rotary drum filter
AA-005	208 Hp Fire Pump which is used as part of the mill fire protection system (Reconstructed Emergency Stationary Reciprocating Internal Combustion Engine)

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
Facility – wide including AA-001, AA-002, and AA-004	Permit to Construct issued August 25, 1992 and modified on September 22, 1997 and November 30, 1998.	3.B.2 3.B.3	PM	Total allowable emissions based on $E=4.1(P)^{0.67}$, not to exceed 52.36 lbs/hr and 229.33 TPY, where P=process input rate in tons/hr E=emissions rate in lbs/hr
	11 Miss. Admin. Code Pt. 2, R. 1.3.B	3.A.2	Opacity	Not to exceed 40%
AA-001	11 Miss. Admin. Code Pt. 2, R. 1.1.4.B(1)	3.B.1	SO ₂	500 ppm (volume)

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.A.1	Opacity	Not to exceed 40%
	Permit to Construct issued on September 28, 1993, and modified on June 25, 1996, September 10, 1996, September 22, 1997, November 30, 1998, May 27, 2005, and February 6, 2007	3.B.4	VOC	434.6 lb/hr not to exceed 234 tons/year
		3.B.5	Production Throughput	Product Group B 5,000 ADMT/yr
				Product Group C 23,500 ADMT/yr
AA-005	40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(3)(iii) and (c)(1)	3.B.6	HAP's	MACT applicability requiring compliance with NSPS Subpart IIII
	40 CFR 60.4200(a)(3), 60.4205(c),(f), and Table 4 of Subpart IIII, 60.4206, 60.4207(b) and 80.510(b)	3.B.7	NMHC+NO _x , CO, and PM (filterable only)	Comply with emission standards in Table 4 over the life of the engine
			Fuel Requirement	Maximum diesel sulfur content of 15ppm Minimum cetane index of 40, or maximum aromatic content of 35 volume percent.
		3.B.8	PM	0.6 lbs/MMBTU

- 3.B.1 For Emission Points AA-001, the maximum permissible emission of sulfur dioxide from any new equipment shall not exceed 500 ppm (volume). (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.4.B(1))
- 3.B.2 The maximum allowable particulate matter (PM) emission limit (filterable only) for the entire facility is based on the process weight equation, $E=4.1(P)^{0.67}$, where P is the process weight input rate in tons/hr and E is the emission rate in lbs/hr, not to exceed 52.36 lbs/hr and 229.33 tons/year. If the process weight input rate (P) changes, the emission rate (E) will change correspondingly. (Ref: 11 Miss. Admin. Code Pt. 2, R. 1.3.F)
- 3.B.3 For Emission Points AA-001, AA-002, and AA-004, the permittee is limited by the Permit to Construct issued on August 25, 1992 and modified on November 30, 1998, May 27, 2008, February 6, 2007, and as specified herein.
- 3.B.4 For Emission Point AA-001, emissions of volatile organic compounds (VOC) shall not exceed 434.6 lbs/hr with an overall limitation of 234.0 tons/year. The VOC limitation

includes the potential VOC emissions due to combustion from the first stage dryer.

3.B.5 For Emission Point AA-001, the permittee shall not exceed the following production rates:

- (a) Production of Product Group B shall not exceed 5,000 ADMT/year in any consecutive 365-day period.
- (b) Production of Product Group C shall not exceed 23,500 ADMT/year in any consecutive 365-day period.

(Ref.: Permit to Construct issued on September 28, 1993, and modified on June 25, 1996, September 10, 1996, September 22, 1997, November 30, 1998, May 27, 2005, and February 6, 2007.)

3.B.6 Emission Point AA-005 is subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. The engine is a reconstructed stationary RICE located at an area source and as such shall meet the requirements of Subpart ZZZZ by meeting the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII. No further requirements of Subpart ZZZZ apply to the engine. (Ref.: 40 CFR 63.6580, 63.6585(a) and (c), and 63.6590(a)(3)(iii) and (c)(1))

3. B.7 Emission Point AA-005 is subject to and shall comply with the Standards of Performance for Stationary Compression Ignition Internal Combustions Engines, 40 CFR Part 60, Subpart IIII. The engine is a reconstructed internal combustion engine and as a certified fire pump engine it shall meet the following emission standards:

- a) NMHC + NO_x – 4.0 g/kW-hr
- b) PM- 0.20 g/kW-hr

The permittee shall use diesel fuel that meets the following requirements for non-road diesel fuel:

- a) Maximum sulfur content of 15 ppm
- b) Minimum cetane index of 40 **OR** maximum aromatic content of 35 volume percent.

The permittee shall operate and maintain the engine such that the emission standards are met over the entire life of the engine. (Ref.: 40 CFR 60.4200(a)(3), 60.4205(c),(f) and Table 4 of Subpart IIII, 60.4206, 60.4207(b) and 80.510(b))

- 3.B.8 For Emission Point AA-005, the maximum permissible emission of ash and/or particulate matter (filterable only) from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

C. Insignificant and Trivial Activity Emission Limitations & Standards

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

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

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

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

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

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

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

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

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

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001 & AA-002	PM	Biennial Compliance Testing	5.B.2	For determination of compliance with limitations set herein
AA-001, AA-002, & AA-004	Opacity	Visible Emissions Evaluations	5.B.5	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)
AA-001	Maintenance Inspections	Daily records of scrubber water flow	5.B.3	11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2)
	Fuel usage	Daily records of type and quantity of fuel combusted	5.B.1	11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2)
AA-004	Maintenance Inspections	Monthly inspections	5.B.4	11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2)
AA-001	Production Limit	Monthly production throughput Total production throughput in any 12 consecutive month rolling period VOC emissions on a 12 month rolling total basis HAP emissions on a 12 month rolling total basis	5.B.6	11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2)
AA-001	PM	Compliance Assurance Monitoring	5.B.7	40 CFR 64
AA-005	Hours of Operation	Install a non-resettable hour meter prior to startup of the engine	5.B.8	40 CFR 60, Subpart IIII (60.4209(a)) and 60.4214(b)
	PM, HAP, NO _x	Monitoring, Recordkeeping and Reporting	5.B.9	40 CFR 60.4211(a), and (e)

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-005	Non-emergency Operation	Limit non-emergency engine operation to 100 hours per year.	5.B.10	40 CFR 60.4211(f)

- 5.B.1 For Emission Point AA-001, the permittee shall record daily the amounts and type of each fuel combusted and shall maintain these records for a period of five (5) years following the date of such record. (Ref.: 40 CFR 60.48c(g) & (I); 11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2))
- 5.B.2 For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with particulate matter by stack testing simultaneously in accordance with EPA Reference Methods 1-5 and submittal of a stack test report by September 1, 2017 and biennially thereafter. For the purposes of the compliance demonstration, the permittee shall operate the sources at peak load conditions. For the purpose of compliance demonstration, peak load conditions shall be identified as within 20% of the maximum rated capacity of the source. The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure all methods are acceptable to the DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.B.3 For Emission Point AA-001, the permittee shall monitor and record the scrubber water flow on a daily basis. During the required stack test, the permittee shall monitor and record the scrubber water flow at 15 minute intervals. The permittee shall maintain these records in log form and submit the records in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2))
- 5.B.4 For Emission Point AA-004, the permittee shall keep on site a spare drum filter cloth, and perform monthly inspections on the rotary drum filter. The permittee shall maintain these records in log form and submit the records in accordance with Condition 5.A.4 of this document. (Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2))
- 5.B.5 For emission points AA-001, AA-002, and AA-004, the permittee shall assure compliance with the opacity limitations by having an observer perform weekly opacity observations during daylight hours for a minimum of six (6) consecutive minutes and maintain a log of the results. These observations shall be performed on each stack, but may be conducted from a location allowing the observation of multiple emission points simultaneously. If any visible emissions are detected, then a Visible Emission Evaluation (VEE) shall be performed using EPA Reference Method 9 by a certified observer. If any visible emissions are detected from a stack, the observation on that stack may be immediately ceased and the VEE may then be performed by a certified observer. If conditions are such that opacity readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to

perform opacity readings/observations. The permittee shall maintain a log of the results and the log shall be made available upon request from MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

5.B.6 For Emission Point AA-001, the permittee shall determine the following for Production Groups B and C:

- a) Monthly production throughput of Production Groups B and C;
- b) The total production throughput per each group (Group B and C) in any consecutive 12 month rolling period;
- c) Compute the total VOC emissions on a twelve month rolling total basis using the following formula to calculate VOC emissions each month:

*((Actual Monthly Facility Production - Actual Monthly Production of Group B – Actual Monthly Production of Group C) * 1.42 lb/ADMT) + (Actual Monthly Production of Group B * 26.62 lb/ADMT) +(Actual Monthly Production of Group C * 0.67 lb/ADMT))*

- d) Compute the total and individual HAP emissions based on a twelve month rolling total basis. The computation shall be based on the actual production rate to confirm that the facility continues to be a minor source of HAPs.
- e) The report shall be submitted in accordance with Condition 5.A.4 with the following information:
 - i. The total throughput for Production Group B based on a twelve month rolling total;
 - ii. The total throughput for Production Group C based on a twelve month rolling total; and,

(Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A(3)(a)(2))

- 5.B.7 For Emission Point AA-001, the permittee is subject to and shall comply with 40 CFR Part 64, Compliance Assurance Monitoring. The permittee shall comply with the CAM plan contained in Appendix B and summarized in the table below. In addition, the permittee shall conduct monitoring and fulfill all other obligations specified in 40 CFR Parts 64.7 through 64.9. In addition, the permittee shall submit semi-annual records of compliance with the Scrubbing Liquid Flow Rate found in the CAM plan in accordance with 5.A.4 of this document.

I. Indicator	Opacity	Scrubbing Liquid Flow Rate
<i>Measurement Approach</i>	Visual emissions are observed and measured.	Scrubbing liquid flow rate is measured using a flow meter. The scrubber is equipped with a flow meter, a backup pump, and a low alarm.
II. Indicator Range	An excursion is defined as opacity > 40%. Excursions trigger an inspection, corrective action, and a reporting requirement within five (5) days.	An excursion is defined as a 15-minute average scrubbing liquid flow rate less than 90% of the average flow rate value recorded during the most recent performance test that demonstrated compliance with the particulate matter emission standard. Excursions trigger an inspection, corrective action, and a reporting requirement within five (5) working days.
III. Performance Criteria		
<i>A. Data Representativeness</i>	Visual observation of opacity from the stack.	The meter measures flow in the scrubber.
<i>B. Verification of Operational Status</i>	N/A	Verified every 15 minutes
<i>C. QA/QC Practices and Criteria</i>	Opacity observers trained and certified per Method 9.	The flow meter is replaced annually in accordance with manufacturer's instructions. The low flow alarm is tested annually. These are part of the preventive maintenance route for the monitor.
<i>D. Monitoring Frequency</i>	Visible emissions checks are performed weekly to ensure equipment is operating properly. The visible emissions checks are performed using either Method 22 or Method 9. If visible emissions are observed, a Method 9 observation is performed to determine if the	Scrubbing liquid flow rate is recorded to ensure that the process is operating at or above the acceptable flow rate. The scrubbing liquid flow rate is measured using a flow meter located downstream of the convergence of the make up water and recycle water flow prior to introduction of the spray nozzle.

	unit is in compliance with the opacity standard.	
<i>E. Data Collection Procedure</i>	Weekly checks by visible emissions observations.	The data collection system automatically collects and records the scrubbing liquid flow rate once every minute.
<i>F. Averaging Period</i>	Visual observation: 6 minute test Averaging per Method 9	The one-minute readings are averaged and reported in 15-minute intervals.

5.B.8 For Emission Point AA-005, the permittee shall install a non-resettable hour meter prior to startup of the engine and keep records of operation of the engine in all emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.
(Ref.: 40 CFR 60.4209(a) and 60.4214(b))

5.B.9 For Emission Point AA-005, the permittee shall install, operate and maintain the engine according to the manufacturer's emission related written instructions, may change only those emission-related settings that are permitted by the manufacturer, and the permittee must demonstrate compliance with the emission limitations contained in Condition 3.B.7 of this permit by either:

- (a) Providing documentation that the engine is certified to meet the emission standards in Condition 3.B.7 of this permit, **OR**
 - (b) Conducting a performance test to demonstrate compliance with the emission standards in Condition 3.B.7 of this permit.
- (Ref.: 40 CFR 60.4211(a), and (e))

5.B.10 For Emission Point AA-005, the permittee shall operate the emergency engine in accordance with (a) through (c) below so that it continues to be considered an emergency engine under this subpart. Any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year as described in (a) through (c) below is prohibited.

- (a) There is no time limit on the use of the engine in emergency situations.
- (b) The engine may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but such a petition is not required if the permittee

keeps records indicating that federal, state, or local standards require maintenance and testing of the engine for more than 100 hours per calendar year.

- (c) The engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing contained in (b). The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. If the source does have a financial agreement with another entity, the 50 hours of non-emergency operation may be used as long as ALL the conditions in 60.4211(f)(3)(i)(A through E) are met. (Ref.: 40 CFR 60.4211(f))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
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 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

CAM PLAN