

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT


Winston Plywood and Veneer Plant
1160 South Church Avenue
Louisville, Mississippi
Winston 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: DEC 20 2018

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: November 30, 2023

Permit No.: 2980-00039

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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 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
 - (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
- 66652 PER20140002

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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

- 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, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the

Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source 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.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the

Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(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.
(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	99.72 MMBTU/Hr Natural Gas Fired Boiler equipped with an oxygen trim system
AA-002	Debarking Operations
AA-003	Block Saw Operations
AA-004	Log Conditioning Operations
AA-005	Veneer Peeling and Clipping Operations
AA-006	Veneer Drying Operations – Emissions Routed to Regenerative Thermal Oxidizer
AA-007	Gluing and Pressing Operations
AA-008	Finishing Operations
AA-009	Cyclone (System #1) which controls emissions from the Panel Saw System and Saw Trim Hog from Emission Point AA-008
AA-010	Cyclone (System #2) which controls emissions from Emission Point AA-007 and Spec. Saw System from Emission Point AA-008
AA-011	Bag Filter (System #3) which controls emissions from the Sander System and Sizer System from Emission Point AA-008
AA-012	99.72 MMBTU/Hr Natural Gas Fired Boiler equipped with an oxygen trim system
AA-013	99.72 MMBTU/Hr Natural Gas Fired Boiler equipped with an oxygen trim system
AA-014	Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping
AA-015	617 Hp Compression Ignition Emergency Fire Pump Engine
AA-016	Sander Dust Silo with Baghouse which controls emissions from the Sander System and Sizer System from Emission Point AA-008
AA-017	West Residuals Dust Bin with Cyclone which controls emissions from Emission Point AA-007 and Trimming Operations associated with Emission Point AA-008
AA-018	29.5 Hp Propane Fired, Spark Ignition 4-Stroke Rich Burn Emergency Generator

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	Federally Enforceable Construction Permit issued on August 4, 2015, and modified February 7, 2017	3.B.1	VOC	Not to exceed 249 tons/yr
AA-001 AA-006 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.B.2	SO ₂	4.8 lbs/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	11 Miss. Admin. Code Pt. 2,, R. 1.3.D(1)(b)	3.B.3	PM	$E = 0.8808 * I^{-0.1667}$
AA-012	Federally Enforceable Construction Permit issued on August 4, 2015, and modified February 7, 2017	3.B.4	Heat Input Rate	Not to exceed 249 MMBTU/hr
AA-013		3.B.5	NSPS	General Applicability
		3.B.6	HAPs	General Applicability
AA-001	11 Miss. Admin. Code Pt. 2, R.1.3.B	3.A.2	Opacity	40%
AA-006				
AA-009				
AA-010				
AA-011				
AA-012				
AA-013				
AA-016				
AA-017				
AA-002	11 Miss. Admin. Code Pt. 2,R. 1.3.F	3.B.7	PM	$E = 4.1p^{0.67}$
AA-003				
AA-005				
AA-006				

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-007 AA-008 AA-009 AA-010 AA-011 AA-016 AA-017				
AA-006 AA-014	40 CFR Part 63, Subpart DDDD - NESHAP for Plywood and Composite Wood Products 40 CFR 63.2231, 40 CFR 63.2232, and 40 CFR 63.2292	3.B.8	HAP	General Applicability
	40 CFR 63.2250	3.B.11		General Requirements
AA-006	40 CFR 63.2240(b) and Table 1B of Subpart DDDD	3.B.9	HAPs	Reduce emission of total HAP, measured as THC (as carbon), by 90%
	40 CFR 63.2240(b) and Table 2 of Subpart DDDD	3.B.10	Temperature	3-hour block average firebox temperature shall be greater than the 1,492 deg F
AA-006 AA-015 AA-018	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.12	PM	0.6 lbs/MMBTU
AA-015 AA-018	40 CFR Part 63, Subpart ZZZZ - NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a)-(b), 40 CFR 63.6590(a)(2)(i)-(ii), 40 CFR 63.6590(b)(1)(i), and 40 CFR 63.6590(c)(6)	3.B.13	HAP	General Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-015 AA-018	40 CFR 63.6640(f) and 40 CFR 63.7575	3.B.14	HAP	Operating Requirements
AA-015	40 CFR Part 60, Subpart IIII - NSPS for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(1)(i), 40 CFR 60.4205(c), 40 CFR 60.4206, 40 CFR 60.4207(b), Table 4 of Subpart IIII, and 40 CFR 80.510(b)	3.B.15	NSPS	General Applicability
			NMHC+NO _x	3.0 g/hp-hr
			PM	0.15 g/hp-hr
			CO	2.6 g/hp-hr
			Diesel Fuel Requirements	Maximum sulfur content of 15ppm
				Minimum cetane index of 40, or maximum aromatic content of 35 volume percent.
AA-018	40 CFR Part 60, Subpart JJJJ - NSPS for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iv), 40 CFR 60.4231(c), 40 CFR 60.4232, 40 CFR 60.4233(c), and 40 CFR 90.103	3.B.16	NSPS	General Applicability
			HC+NO _x	13.4 g/kw-hr
			CO	519g/kw-hr

- 3.B.1 For the entire facility, VOC emissions shall not exceed 249 tons/yr (as VOC) as determined by EPA Other Test Method 26 (VOC Measurement for the Wood Products Industry). (Ref.: Federally Enforceable Construction Permit issued on August 4, 2015, and modified February 7, 2017.)
- 3.B.2 For Emission Points AA-001, AA-006, AA-012, and AA-013, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.B.3 For Emission Points AA-001, AA-012, and AA-013, the maximum permissible emission of ash and/or particulate matter (filterable only) from fossil fuel burning installations with equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b))

- 3.B.4 For Emission Points AA-001, AA-012, and AA-013, the permittee shall not exceed the heat input rate of 249 MMBTU/hr as measured with a 3-hour rolling average for the three boilers combined. (Ref.: Federally Enforceable Construction Permit issued on August 4, 2015, and modified February 7, 2017.)
- 3.B.5 Emission Points AA-001, AA-012, and AA-013, are subject to and shall comply with New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc and the General Provisions in Subpart A. (Ref.: 40 CFR 60.40c(a))
- 3.B.6 Emission Points AA-001, AA-012, and AA-013 are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources, 40 CFR Part 63, Subpart DDDDD.

These boilers are new units equipped with continuous oxygen trim systems designed to maintain optimum air/fuel ratios. The boilers are in the “units designed to burn gas 1 fuel” subcategory, as listed in 40 CFR 63.7499(l) and defined in 40 CFR 63.7575, and, as such, are only required to comply with the work practice standard in Condition 3.D.1. (Ref: 40 CFR 63.7485, 63.7490(a)(2) and (b), 63.7499(l), 63.7500(a)(1), and 63.7575)

- 3.B.7 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter (filterable only) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

Pt. 2, R. 1.3.F)

- 3.B.8 Emission Points AA-006 and AA-014 are subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD and the General Provisions in Subpart A.

Emission Point AA-006 is a softwood veneer dryer, as defined in 40 CFR 63.2292, equipped with a regenerative thermal oxidizer and, as such, shall comply with the applicable compliance and operating requirements and work practice standards of 40 CFR Part 63, Subpart DDDD.

Emission Point AA-014 is all Group 1 miscellaneous coating operations, as defined in 40 CFR 63.2292, and, as such, is only required to comply with the work practice standards of 40 CFR Part 63, Subpart DDDD. (Ref.: 40 CFR 63.2231, 63.2232, and 63.2292)

- 3.B.9 For Emission Point AA-006, the permittee shall reduce emissions of Total HAP's, measured as THC (as carbon), by 90%. (Ref: 40 CFR 63.2240(b) and Table 1B of Subpart DDDD)
- 3.B.10 For Emission Point AA-006, the permittee shall maintain the 3-hour block average firebox temperature above 1,492 deg F. (Ref.: 40 CFR 63.2240(b) and Table 2 of Subpart DDDD)
- 3.B.11 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) Shutoff of direct-fired burners resulting from partial and full production stoppages of direct-fired softwood veneer dryers or over-temperature events shall be deemed

shutdowns and not malfunctions. Lighting or re-lighting any one or all gas burners in direct-fired softwood veneer dryers shall be deemed startups and not malfunctions. (Ref.: 40 CFR 63.2250)

- 3.B.12 For Emission Points AA-006, AA-015, and AA-018, 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.B.13 Emission Points AA-015 and AA-018 are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ.

Emission Point AA-015 is a new compression ignition emergency fire pump stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions and, as such, is only required to meet the definition of “emergency stationary RICE” in 40 CFR Part 63, Subpart ZZZZ.

Emission Point AA-018 is a new 4-stroke rich burn spark ignition emergency stationary RICE with a site rating of less than 500 brake HP located at a major source of HAP emissions and, as such, is required to meet the definition of “emergency stationary RICE” in 40 CFR Part 63, Subpart ZZZZ and shall meet all other requirements of Subpart ZZZZ by meeting the applicable requirements of 40 CFR Part 60, Subpart JJJJ.

(Ref. 40 CFR 63.6585(a)-(b), 63.6590(a)(2)(i)-(ii), 63.6590(b)(1)(i), and 63.6590(c)(6))

- 3.B.14 For Emission Points AA-015 and AA-018, the permittee shall operate the emergency engines according to the requirements below.
- (a) There is no limit on the use of the engines during emergency situations.
 - (b) The engines may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that 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 DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year allowed by this paragraph.

- (c) The engines 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. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

If an emergency engine is not operated according to the requirements in (a)-(c) above, the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and will need to meet all applicable requirements for a non-emergency engine. (Ref.: 40 CFR 63.6640(f) and 63.6675)

- 3.B.15 Emission Point AA-015 is subject to and shall comply with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII and the General Provisions in Subpart A.

The engine is a new certified fire pump engine with a displacement of less than 30 liters/cylinder and, as such, shall meet the following emission standards:

- a) NMHC + NO_x –3.0 g/hp-hr
- b) PM-0.15 g/hp-hr
- c) CO –2.6 g/hp-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)(2)(ii), 60.4205(c), 60.4206, 60.4207(b), Table 4 of Subpart IIII, and 80.510(b))

- 3.B.16 Emission Point AA-018 is subject to and shall comply with the New Source Performance Standards for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE), 40 CFR Part 60, Subpart JJJJ. The engine is a new certified propane fired 4-stroke rich burn emergency SI ICE with a site rating greater than 25 HP and, as such,

shall meet the following emission standards:

- a) HC +NO_x –13.4 g/kw-hr
- b) CO –519 g/kw-hr

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 60.4230(a)(4)(iv), 60.4231(c), 60.4232, 60.4233(c), and 90.103)

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)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Limit/Standard
AA-001	NESHAP, Subpart DDDDD	3.D.1	5-year tune-ups
AA-012	40 CFR 63.7510(g);		
AA-013	40 CFR 63.7515(d); 40 CFR 63.7540(a)(10)(i)-(vi), (12), and (13); and Table 3 of Subpart DDDDD		
	40 CFR 63.7540(a)(12)	3.D.2	Set the oxygen level in the fuel no lower than the oxygen concentration measured during the most recent tune-up
	40 CFR 63.7500(a)(3))	3.D.3	Operate and maintain boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions
AA-006	NESHAP, Subpart DDDD 40 CFR 63.2241(a) and Table 3 of Subpart DDDD	3.D.4	Minimize fugitive emissions
AA-014	NESHAP, Subpart DDDD 40 CFR 63.2241(a) and Table 3 of Subpart DDDD	3.D.5	Use only non-HAP containing coatings

3.D.1 For Emission Points AA-001, AA-012, and AA-013, the permittee shall complete an initial tune-up no more than 61 months after startup. Subsequent tune-ups shall be completed no more than 61 months after the previous tune-up. If a boiler is not operating on the required date of the tune-up, the tune-up must be conducted within 30 calendar days of startup. Each tune-up must be completed in accordance with (a) through (f) below.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may perform the burner inspection any time prior to the tune-up or delay the inspection until the next scheduled or unscheduled unit shutdown, but the burner must be inspected once every 72 months).

- (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 (permittee may delay the inspection until the next scheduled shutdown).
- (d) Optimize total emissions of carbon monoxide. 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 carbon monoxide 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.
- (f) Maintain on-site and submit, if requested, an annual report containing the following:
 - (1) the concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the unit;
 - (2) a description of any corrective actions taken as a part of the tune-up; and
 - (3) the type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (Ref.: 40 CFR 63.7510(g); 63.7515(d); 63.7540(a)(10)(i)-(vi), (12), and (13); and Table 3 of Subpart DDDDD)

(Ref.: 40 CFR 63.7540(a)(10), Subpart DDDDD)

- 3.D.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall, using the oxygen trim system, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up.

(Ref.: 40 CFR 63.7540(a)(12))

- 3.D.3 For Emission Points AA-001, AA-012, and AA-013, the permittee shall, at all times, operate and maintain the boilers, including associated air pollution control equipment

and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Agency that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.7500(a)(3))

- 3.D.4 For Emission Point AA-006, the permittee shall minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and from the green end of the dryers (through proper balancing of the heated zone exhausts). (Ref.: 40 CFR 63.2241(a) and Table 3 of Subpart DDDD)
- 3.D.5 For Emission Point AA-014, the permittee shall only use non-HAP containing coatings, as defined in 40 CFR 63.2292. (Ref.: 40 CFR 63.2241(a) and Table 3 of Subpart DDDD)

SECTION 4. COMPLIANCE SCHEDULE

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.1	Heat Input Rate	Continuous Monitoring
AA-012	40 CFR 60, Subpart Dc	5.B.2	Fuel Usage	Monthly recordkeeping
AA-013	40 CFR 60.48c(g)(2) &(i)			
	40 CFR 60, Subpart A 40 CFR Part 60.7(b)	5.B.3	SSM	Recordkeeping
	40 CFR 63, Subpart DDDDD 40 CFR 63.7555(a)	5.B.4	HAP	Recordkeeping – Notifications, Reports, and Compliance Demonstrations
	40 CFR 63.7560	5.B.5		Recordkeeping
AA-009 AA-010 AA-011 AA-016 AA-017	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.6	Opacity	Weekly Visible Emissions Evaluations
AA-006 AA-009	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.7	Maintenance Inspections	Monthly Inspections

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-010 AA-011 AA-016 AA-017				
AA-006	40 CFR 63, Subpart DDDD 40 CFR 63.2269(b)	5.B.8	HAP	Continuous Parameter Monitoring System Requirements
	40 CFR 63.2269(b)	5.B.9		Temperature Monitoring Device Requirements
	40 CFR 63.2270, 40 CFR 63.2271(a), and Table 7 of Subpart DDDD	5.B.10		Continuous Compliance
	40 CFR 63.2271(a) and Table 8 of Subpart DDDD	5.B.11		Continuous Compliance
	40 CFR 63.2282(a) - (b) and Table 7 and 8 of Subpart DDDD	5.B.13		Recordkeeping
AA-014	40 CFR 63, Subpart DDDD 40 CFR 63.2271(a) and Table 8 of Subpart DDDD	5.B.12	HAP	Continuous Compliance
AA-006 AA-014	40 CFR 63, Subpart DDDD 40 CFR 63.2283	5.B.5	HAP	Recordkeeping
AA-015	40 CFR 60, Subpart IIII 40 CFR 60.4214(b)	5.B.14	Hours of Operation	Record hours of operation in emergency and non-emergency service
	40 CFR 60.4211(a), (c), and (g)	5.B.15	PM, CO, NMHC+NO _x	Maintain engine certification OR conduct required maintenance, testing, and recordkeeping for non-certified engines
	40 CFR 60.4211(f) and 40 CFR 60.4219	5.B.16	Non-emergency Operation	Operational Restrictions
AA-018	40 CFR 60, Subpart JJJJ 40 CFR 60.4245(b)	5.B.14	Hours of Operation	Record hours of operation in emergency and non-emergency service
	40 CFR 60.4243(a)	5.B.17	CO, HC+NO _x	Maintain engine certification OR conduct required maintenance and recordkeeping for non-certified engines

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
	40 CFR 60.4243(d) and 40 CFR 60.4248	5.B.18	Non-emergency Operation	Operational Restrictions
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.B.19	VOC's	Monthly Recordkeeping

- 5.B.1 For Emission Points AA-001, AA-012, and AA-013, the permittee shall keep a record of the heat input of all three boilers on a continuous basis in order to demonstrate compliance with the heat input limitation on a 3-hour rolling average. A summary report shall be submitted by January 31 and July 31 for the preceding six month period and in accordance with Condition 5.A.4. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.B.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall record and maintain records of the amount of fuel combusted in each boiler during each calendar month. These records shall be maintained on-site for a period of two years following the date of such record. (Ref.: 40 CFR 60.48c(g)(2) & (i))
- 5.B.3 For Emission Points AA-001, AA-012, and AA-013, the permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction of operation; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (Ref.: 40 CFR 60.7(b))
- 5.B.4 For Emission Points AA-001, AA-012, and AA-013, the permittee shall keep the following records:
- (a) A copy of each notification and report submitted to comply with 40 CFR 63, Subpart DDDDD, including all documentation supporting any Initial Notification, Notification of Compliance Status, or compliance report.
 - (b) Records of compliance demonstrations and performance evaluations.
- (Ref.: 40 CFR 63.7555(a))
- 5.B.5 For Emission Points AA-001, AA-006, AA-012, AA-013, and AA-014, the permittee shall maintain records as outlined in (a) through (c) below.
- (a) Records must be in a form suitable and readily available for expeditious review.
 - (b) Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

- (c) Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept off site for the remaining 3 years.

(Ref.: 40 CFR 63.2283 and 63.7560)

- 5.B.6 For Emission Points AA-009, AA-010, AA-011, AA-016, and AA-017, 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. 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 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.7 For Emission Points AA-006, AA-009, AA-010, AA-011, AA-016, and AA-017, the permittee shall perform monthly 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 the monthly inspections and any maintenance work shall be kept in log form and must be made available for review upon request during any section visit by MDEQ personnel. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))
- 5.B.8 For Emission Point AA-006, 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.9 For Emission Point AA-006, 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.10 For Emission Point AA-006, the permittee shall monitor, collect, and reduce data to demonstrate continuous compliance with the firebox temperature requirements in Condition 3.B.10 according to the following:
- (a) except during monitor malfunctions, associated repairs, and required quality assurance or control activities, continuously monitor the thermal oxidizer firebox temperature at all times the veneer dryers are operating;
 - (b) when calculating the 3-hour block average firebox temperature, use all recorded temperature readings, except for data recorded during monitoring malfunctions and associated repairs; required monitor quality assurance and control activities; periods of startup, shutdown, or malfunction; or during control device downtime covered by an approved routine control device maintenance exemption; and,
 - (c) calculate the 3-hour block average firebox temperature after every 3 hours of operation as the average of the evenly spaced readings during the previous 3

operating hours. At least 75% of the required readings for that period, using only valid data, are needed in order to calculate the 3-hour average.

(Ref.: 40 CFR 63.2270, 63.2271(a), and Table 7 of Subpart DDDD)

- 5.B.11 For Emission Point AA-006, the permittee shall demonstrate continuous compliance with the work practice standard in Condition 3.D.4 by documenting that the facility is following their plan for minimizing fugitive emissions from the veneer dryer heated zones. (Ref.: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD)
- 5.B.12 For Emission Point AA-014, the permittee shall demonstrate continuous compliance with the work practice standard in Condition 3.D.5 by using only non-HAP coatings and keeping records demonstrating that only non-HAP coatings are being used. (Ref.: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD)
- 5.B.13 For Emission Points AA-006, the permittee shall keep a copy of the following records.
- (a) Each notification and report submitted to comply with Subpart DDDD, including all documentation used to support the Initial Notification or Notification of Compliance Status.
 - (b) Records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - (c) Documentation of any approved routine control device maintenance exemption, if one was requested.
 - (d) Results of all performance tests and continuous monitoring system performance evaluations.
 - (e) Records documenting continuous compliance with the minimum 3-hour block average firebox temperature in Condition 3.B.10 and the work practice standard in Condition 3.D.5.

(Ref. 40 CFR 63.2282(a) and (b) and Tables 7 and 8 of Subpart DDDD)

- 5.B.14 For Emission Points AA-015 and AA-018, the permittee shall keep records of operation of the engine in emergency and non-emergency service, as recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. If the engine is operating in emergency service, the record shall include what classified the operation as emergency. (Ref.: 40 CFR 60.4214(b) and 60.4245(b))
- 5.B.15 For Emission Point AA-015, the permittee shall demonstrate compliance with the emission limitations in Condition 3.B.15 by providing documentation that the engine is certified to meet those standards. The permittee shall operate and maintain the engine according to the manufacturer's emission related written instructions and may change only those emission-related settings that are permitted by the manufacturer; otherwise, the permittee shall demonstrate compliance according to 40 CFR 60.4211(g). (Ref.: 40 CFR 60.4211(a), (c), and (g))
- 5.B.16 For Emission Point AA-015, the permittee shall operate the emergency engine in accordance with Condition 3.B.14. If the 50 hours per calendar year allowed for non-emergency operation, as described in Condition 3.B.14(c), is used to supply power as part of a financial arrangement with another entity, all conditions in 60.4211(f)(3) must be met. Otherwise, the engine will not be considered an emergency engine under 40 CFR 60, Subpart IIII and will need to meet all applicable requirements for a non-emergency engine. (Ref.: 40 CFR 60.4211(f) and 60.4219)
- 5.B.17 For Emission Point AA-018, the permittee shall demonstrate compliance with the emission limitations in Condition 3.B.16 by providing documentation that the engine is certified to meet those standards. The permittee shall operate and maintain the engine according to the manufacturer's emission related written instructions and may change only those emission-related settings that are permitted by the manufacturer; otherwise, the permittee shall demonstrate compliance according to 40 CFR 60.4243(a)(2). (Ref.: 40 CFR 60.4243(a))
- 5.B.18 For Emission Point AA-018, the permittee shall operate the emergency engine in accordance with Condition 3.B.14. If the 50 hours per calendar year allowed for non-emergency operation, as described in Condition 3.B.14(c), is used to supply power as part of a financial arrangement with another entity, all conditions in 60.4243(d)(3) must be met. Otherwise, the engine will not be considered an emergency engine under 40 CFR 60, Subpart JJJJ and will need to meet all applicable requirements for a non-emergency engine. (Ref.: 40 CFR 60.4243(d) and 60.4248)
- 5.B.19 For the entire facility, the permittee shall determine the facility wide VOC emission rate in tons/year on a rolling 12-month basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001 AA-012 AA-013	40 CFR 63, Subpart DDDDD 40 CFR 63.7550(a) - (b) and Table 9 of Subpart DDDDD	5.C.1		Compliance Reports - Schedule
	40 CFR 63.7550(c)	5.C.2		Compliance Reports - Content
	11 Miss. Admin. Code Pt. 2, R. 6.3.C(1) and 40 CFR 63.7550(h)(3))	5.C.3		Compliance Reports – Submissions
AA-006 AA-014	40 CFR 63, Subpart DDDD 40 CFR 63.2281(a) and Table 9 of Subpart DDDD	5.C.5	HAP	Semi-annual and SSMP Reports
AA-006	40 CFR 63.2280(g))	5.C.4		Notification of control or monitoring system changes
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)	5.C.6	VOC	In accordance with Condition 5.A.4, submit a semiannual report of the facility wide emission rate for VOC's on rolling 12 month basis.

5.C.1 For Emission Points AA-001, AA-012, and AA-013, after each tune-up required in Condition 3.D.1 has been completed, the permittee shall submit a compliance report in accordance with the next report required per Condition 5.A.4. (Ref.: 40 CFR 63.7550(a) - (b) and Table 9 of Subpart DDDDD)

5.C.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall include the following information in the compliance report required in Condition 5.C.1.

- (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 each 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.
- (f) 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.

(Ref.: 40 CFR 63.7550(c), Subpart DDDDD)

5.C.3 For Emission Points AA-001, AA-012, and AA-013, the permittee shall submit compliance reports as outlined below.

- (a) Written Reports shall be submitted to MDEQ at the following address:

Chief, Environmental Compliance and Enforcement Division
Mississippi Department of Environmental Quality
Office of Pollution Control
P.O. Box 2261
Jackson, Mississippi 39225

- (b) Electronic reports shall be submitted using CEDRI that is accessed through EPA's Central Data Exchange (CDX) at www.epa.gov/cdx.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(1) and 40 CFR 63.7550(h)(3))

5.C.4 For Emission Point AA-006, the permittee shall notify MDEQ and EPA at least 30 days before modifying or replacing the control system or changing any continuous monitoring parameter. (Ref.: 40 CFR 63.2280(g))

5.C.5 For Emission Points AA-006 and AA-014, the permittee shall submit the following reports.

- (a) A semi-annual compliance report containing all applicable information in 40 CFR 63.2281(c)-(g). The report shall be submitted in accordance with Condition 5.A.4.
- (b) A startup, shutdown, and malfunction report if there is a startup, shutdown, or malfunction during the reporting period that is not consistent with the SSMP. The report shall include all actions taken as a result of the event. This information shall be reported to the MDEQ via fax or telephone 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(a) and Table 9 of Subpart DDDD)

5.C.6 The permittee shall maintain records summarizing the facility wide emission rate for VOC's on a rolling 12-month basis utilizing the following:

- (a) Monthly Plywood Production
- (b) AP-42 Emission Factors
- (c) Results from most recent stack tests
- (d) Monthly usage for paints, coatings, sealants, glues, etc.

All records 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. All records shall be maintained by the permittee for a period of five (5) years following the date of such record. The permittee must submit a compliance report semiannually according to Condition 5.A.4 of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

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://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	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