

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Hood Industries Inc, Wiggins
1945 South First Street
Wiggins, Mississippi
Stone 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: FEB 26 2019

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: JAN 31 2024

Permit No.: 2540-00003

1642 PER20100001

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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 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 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-000	Facility Wide
AA-001	Hybrid Suspension Grate Wood Fired Boiler No. 1 (Heat Input Capacity 81.8 MMBTU/HR), equipped with a Multiclone Collector
AA-002	Hybrid Suspension Grate Wood Fired Boiler No. 2 (Heat Input Capacity 81.8 MMBTU/HR), equipped with a Multiclone Collector
AA-003	Hybrid Suspension Grate Wood Fired Boiler No. 3 (Heat Input Capacity 90 MMBTU/HR), equipped with a Multiclone Collector
AA-004	23-Section Plywood Veneer Dryer No. 2 cooling zone (There are 3 stacks associated with this emission point)
AA-005	The 4-Head Plywood Sander and 1-Head Sander equipped with a Quad-Pak Cyclone (4 Cyclones operating in parallel)
AA-006	Sander Dust High Pressure Relay Cyclone located at the wood/bark fired boiler's Fuel House. This cyclone receives dust from the Quad-Pak
AA-007	17-Section Plywood Veneer Dryer No. 1 cooling zone (There are 3 stacks associated with this emission point)
AA-008	Dry Veneer Waste Cyclone (The first step of a conveyance system for hogged material which utilizes a cyclone for recovering usable wood material)
AA-009	Dry Veneer Waste Cyclone (The second step of conveyance system where wood material is further separated and collected using cyclone)
AA-010	Log Yard Fines Cyclone (A separator and collection point for chip fines from the Log Yard equipped with a cyclone)
AA-011	Log Yard Surge Bin (A collection point and/or surge bin which screens and sizes chips generated from the Log Yard and/or Stud Mill) Note: The correct sized chips are blown to either Emission Point AA-015 or Emission Point AA-013
AA-012	Veneer Surge Bin. Storage bin for veneer chips.
AA-013	Core/Log Yard Chip Loading Cyclone. Chip loading for core and log yard chips. Does not operate simultaneously with emission point AA-015.
AA-014	Veneer Chip Loading Cyclone. Chip loading for green veneer chips. Does not operate simultaneously with emission point AA-016.
AA-015	Core/Log Yard Chip Discharge. Discharge of chips from cores and log yard. Does not operate simultaneously with emission point AA-013.
AA-016	Veneer Chip Discharge. Does not operate simultaneously with emission point AA-014.
AA-017	Layup and Pressing; Veneers are sorted and stacked for glue application, glue is applied, and the stacks are pressed while steam heated.

Emission Point	Description
AA-025	23-Section Plywood Veneer Dryer No. 3 three heated drying zones equipped with a Regenerative Thermal Oxidizer No. 1 (Hood Ref. RTO1) for air emission controls.
AA-026	23-Section Plywood Veneer Dryer No. 3 cooling zone (There 3 stacks associated with this emission point)
AA-027	17-Section Plywood Veneer Dryer No. 1 three heated zones and 23-Section Plywood Veneer Dryer No. 2 three heated zones equipped with a Regenerative Thermal Oxidizer No. 2 (Hood Ref. RTO2) for air emission controls.
AA-028	487 hp Emergency Fire Pump (Existing Compression Ignition Stationary Reciprocating Internal Combustion Engine)
AA-029	Plant Access (Paved and unpaved) Roads (Fugitive Emissions)
AA-030	All Group 1 Miscellaneous Coating Operations including but not limited to Logo Painting, Edge Sealing, and Grade Stamping
AA-031	217 hp (162 kW) Diesel Fired Emergency Generator (Model year 2013 Compression Ignition Reciprocating Internal Combustion Engine (RICE)/(ICE) with displacement <10 liters/cylinder)

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	Pollutant/Parameter	Limit/Standard
AA-000	40 CFR Part 63, Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products	3.B.7	HAPs	General Applicability
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R.1.3.D(2).	3.B.1	PM	0.3 grains per standard dry cubic foot
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.2	SO ₂	4.8 lbs/MMBTU
	40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63.7485, 63.7499, 63.7500(a)(1), and Table 2 of Subpart DDDDD)	3.B.3	HAPs	General Applicability
	40 CFR 63.7510(a) and Table 2, Subpart DDDDD		Filterable PM	0.44 lb/MMBTU of heat input or 0.55 lb/MMBTU of steam output
			CO	3,500 ppm by volume on a dry basis corrected to 3 % oxygen, 3-run average or 3.5 lb/MMBTU of steam output
			Hg	0.0000057 lb/MMBTU of heat input or 0.0000064 lb/MMBTU of steam output
			HCl	0.022 lb/MMBTU of heat input or 0.025 lb/MMBTU of steam output
	40 CFR 63.7500(a)(2) and Items 6, 7 and 8 of Table 4, Subpart DDDDD	3.B.4	Operating Limits	a) 30-day rolling average operating load not to exceed 110 percent of the highest hourly average operating load recorded during qualifying test runs b) Operate the oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during a qualifying CO performance test
AA-004 Through AA-017 AA-025 AA-026 AA-027	11 Miss. Admin. Code Pt. 2, R. 1.3.F.	3.B.5	PM	$E = 4.1p^{0.67}$

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-005 AA-006 AA-008 AA-009 AA-010 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.B.19	Operational Restriction	The process(s) associated with a cyclone cannot operate in the event the cyclone fails.
AA-005	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(a)	PM	7.32 lbs/hr and 20.55 TPY
			PM ₁₀	6.31 lbs/hr and 17.73 TPY
AA-006	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(b)	PM	1.80 lbs/hr and 5.05 TPY
			PM ₁₀	1.53 lbs/hr and 4.30 TPY
AA-005 AA-006	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(c)	Annual Hourly Restriction	5,616 hours per year in any consecutive 365-day period
		3.B.6(d)	Operational Limitation	The control device (cyclone) must be operative when operating the 4-head plywood sander or the 1-head plywood sander associated with these emission points.
AA-025	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(e)	VOC	Reduce VOCs by 90% or greater
			Operational Limitation	The emission point shall not be operated without the control device (Regenerative Thermal Oxidizer)
		3.B.6 (g)	PM	0.7 lbs/hr and 3.1 TPY
			PM ₁₀	0.56 lbs/hr and 2.5 TPY
AA-004 AA-007 AA-027	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(h)	Operational Limitation	The two dryers associated with these emission points are limited to a total maximum production of 191 MM sf/year (3/8" basis)
AA-017	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	3.B.6(i)	Operational Limitation	The presses are limited to a total maximum production of 274 MM sf/year (3/8" basis)
AA-027	40 CFR Part 63, Subpart DDDD	3.B.8	HAP's	Routine Control Device Maintenance Exemption (RCDME)
AA-025 AA-027	40 CFR Part 63, Subpart DDDD	3.B.9	HAPs	Reduce emission of total HAPs measured as THC, by 90%
		3.B.10	General Operations Requirement	General Operations Requirement
		3.B.11	Temperature	(a) Maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test; or (b) Maintain the 3-hour block average THC concentration in the thermal oxidizer exhaust below the maximum concentration established during the performance test.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AA-028 AA-031	40 CFR Part 63, Subpart ZZZZ- National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(b), 40 CFR 63.6590(a)(1)(ii) and (2)(ii), 40 CFR 63.6590(c)(6), and 40 CFR 63.6675	3.B.12	HAP	General Applicability
	40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) 40 CFR 60.4211(f), Subpart IIII and 40 CFR 63.6640(f)(1),(2) and (4), Subpart ZZZZ	3.B.14	HAP	No limit on operational hours in emergencies; may operate each engine up to 100 hours/yr in non-emergencies specified in the condition
AA-028	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.13	PM	0.6 lbs./MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.2	SO ₂	4.8 lbs./MMBTU
	40 CFR 63.6602, 40 CFR 63.6625(h), and Table 2c, Subpart ZZZZ	3.B.15	HAP	Operating/Maintenance Requirements
AA-031	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.13	PM	0.6 lbs./MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.2	SO ₂	4.8 lbs./MMBTU
	40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) 40 CFR 60.4200(a)(2)(i)	3.B.16		General Applicability
	40 CFR 60.4205(b) and 60.4206, Subpart IIII Table 1 in 40 CFR 89.112 40 CFR 89.113	3.B.17	Emission Limitations	Compliance via 40 CFR 60.4202(a)(2), as specified in 40 CFR 60.4205(b), for the entire life of the engine. Comply with the emission limits for new non-road CI engines in 40 CFR 89.112 and 40 CFR 89.113 as follows:
			NMHC+NO x	4.0 g/kW-hr
			CO	3.5 g/kW-hr

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
			PM	0.20 g/kW-hr
			Opacity	20% during acceleration mode 15% during lugging mode 50% during the peaks in either the acceleration mode or lugging modes
	40 CFR 60.4207(b), Subpart IIII	3.B.18	Fuel Limitation	Purchase diesel fuel that meets the following requirements, as outlined in 40 CFR 80.510(b) for non-road diesel fuel: Maximum of 15 ppm sulfur content, and either a minimum cetane index of 40 or maximum aromatic content of 35% by volume

3.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee is allowed a particulate matter (PM) emission rate up to 0.3 grains per standard dry cubic foot for each boiler.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(2).)

3.B.2 For Emission Points AA-001, AA-002, AA-003, AA-028, and AA-031, 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 Emission Points AA-001, AA-002, and AA-003 are subject to and shall comply with the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD.

Emission Points AA-001, AA-002, and AA-003 are existing large boilers that are in the “hybrid suspension/grate burner designed to burn wet biomass/bio-based solid” fuel subcategory. The permittee shall comply with all applicable emission limitations for such units found in Table 2 of Subpart DDDDD, and specified in the permit table above.

(Ref.: 40 CFR 63.7485, 63.7499, 63.7500(a)(1), and Table 2, Subpart DDDDD)

3.B.4 Emission Points AA-001, AA-002, and AA-003 shall meet the following operating

limits from Table 4 of Subpart DDDDD that are applicable:

- (a) Maintain the daily 30-day rolling average operating load of the boiler so that it does not exceed 110 percent of the highest hourly average operating load recorded during qualifying test runs, in accordance with the operating limits establishment, confirmation and reestablishment requirements of Subpart DDDDD.
- (b) Operate the oxygen trim system on the boiler with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during a qualifying CO performance test according to Table 7 of Subpart DDDD.

(Ref.: 40 CFR 63.7500(a)(2) and Items 6, 7 and 8 of Table 4, Subpart DDDDD)

- 3.B.5 For Emission Points AA-004 through AA-017, AA-025, AA-026, and AA-027, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3(F))

- 3.B.6 The permittee shall comply with the limits established in the Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017. These limits are specifically stated below and in Table 3.B for each emission point:

- (a) For Emission Point AA-005, the permittee is allowed a particulate matter (PM) emission rate of 7.32 lbs/hr and 20.55 ton/yr and a particulate matter 10 microns or less (PM₁₀) emission rate of 6.31 lbs/hr and 17.73 ton/yr
- (b) For Emission Point AA-006, the permittee is allowed a particulate matter (PM) emission rate of 1.80 lbs/hr and 5.05 ton/yr and a particulate matter 10 microns or less (PM₁₀) emission rate of 1.53 lbs/hr and 4.30 ton/yr
- (c) The permittee is authorized to operate Emission Points AA-005 and/or AA-006 a maximum of 5,616 hours/year in a consecutive 365-day period.
- (d) The permittee shall not operate either the 4-Head Plywood Sander or the 1-Head Sander without controlling the PM/PM10 emissions using the cyclones designated in Emission Points AA-005 AND AA-006.
- (e) For Emission Point AA-025, the permittee shall reduce VOCs by 90% or greater.

- (f) The permittee shall not operate Emission Point AA-025 without the use of the Regenerative Thermal Oxidizer. In the event of a failure of the pollution control equipment, the permittee shall cease operations of Emission Point AA-025 until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.
- (g) For Emission Point AA-025, the permittee is allowed a particulate matter (PM) emission rate of 0.7 lbs/hr and 3.1 ton/yr and a particulate matter 10 microns or less (PM₁₀) emission rate of 0.56 lbs/hr and 2.5 ton/yr.
- (h) The two dryers associated with Emission Points AA-004, AA-007 and AA-027, are limited to a total maximum production of 191 MM sf/year (3/8" basis)
- (i) For Emission Point AA-017, the permittee shall be limited to a total maximum production of 274 MM sf/year (3/8" basis) at the plywood presses

(Ref.: Federally enforceable limits established in PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 3.B.7 Emission Point AA-000 is subject to and shall comply with 40 CFR Part 63, Subpart DDDD- National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A- General Provisions, as specified in Table 10 of Subpart DDDD.

(Ref.: 40 CFR 63 Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products, 40 CFR 63.2231, Subpart DDDD)

- 3.B.8 For Emission Point AA-027, the compliance options and operating requirements for the RTO will not apply while a routine control device maintenance activity requiring the control device to be taken off-line is being done. The total downtime of the control device allowed under this exemption is limited to less than 0.5 percent of the annual operating uptime. The permittee shall make every effort to initiate and complete maintenance activities during any scheduled downtime.

(Ref.: 40 CFR 63.2251, Subpart DDDD)

- 3.B.9 For Emission Points AA-025 and AA-027, the permittee shall reduce emissions of total HAP, measured as THC, by 90%. The

(Ref.: 40 CFR 63.2240(b) and Table 1B, Subpart DDDD)

- 3.B.10 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 40 CFR 63, Subpart DDDD at all times, except during periods of process unit or control device start-up, shutdown, and malfunction; prior to process unit initial start-up, and during the routine control device maintenance exemption specified in 40 CFR 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 start-up, shutdown, and malfunction. Start-up and shutdown periods must not exceed the minimum amount of time necessary for the events.
- (b) The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions 40 CFR 63.6(3)(1)(i).
- (c) The permittee shall develop a written start-up, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6 (e)(3).

(Ref.: 40 CFR 63.2250 (a)-(c), Subpart DDDD)

3.B.11 For Emission Points AA-025 and AA-027, the permittee shall comply with one of the described Operating Requirements for the RTOs:

- (a) Maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test; or
- (b) Maintain the 3-hour block average THC concentration in the thermal oxidizer exhaust below the maximum concentration established during the performance test.

(Ref.: 40 CFR 63 Table 2, Subpart DDDD)

3.B.12 Emission Points AA-028 and AA-031 are subject to and shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).

Emission Point AA-028 is an existing emergency compression ignition (CI) stationary RICE with a site rating less than 500 brake HP located at a major source of HAP emissions.

Emission Point AA-031 is a new emergency CI RICE with a site rating less than 500 brake HP located at a major source of HAP emissions. As such, the engine is required to meet the requirements of this standard by meeting the requirements of 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI)

Internal Combustion Engines (ICE). No further requirements under the provisions of 40 CFR Part 63, Subpart ZZZZ apply.

(Ref.: 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE); 40 CFR 63.6585(b), 63.6590(a)(1)(ii) and (2)(ii), 63.6590(c)(6), and 63.6675)

- 3.B.13 For Emission Points AA-028, and AA-031, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 3.B.14 For Emission Points AA-028 and AA-031, the permittee shall operate each engine according to these requirements:

- (a) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in (1) through (3) for a maximum of 100 hours per calendar year.
 - (1) Operated 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 MDEQ 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 ICE beyond 100 hours per calendar year.
 - (2) Operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
 - (3) Operated for periods where there is a deviation of voltage or frequency of 5 percent greater below standard voltage or frequency.

- (c) The Emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations and these hours are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in part (b) of this condition. 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 emergency engine is not operated according to the requirements in (a) through (c) above, the engine will not be considered an emergency engine under 40 CFR Part 60, Subpart IIII and 40 CFR Part 63, Subpart ZZZZ and must meet the applicable requirements for non-emergency engines.

(Ref.: 40 CFR 60.4211(f), Subpart IIII and 40 CFR 63.6640(f)(1),(2) and (4), Subpart ZZZZ)

3.B.15 For Emission Point AA-028, the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace when necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- (d) During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the maintenance practice according to the schedule listed in (a)-(c) above, or if performing the maintenance practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The maintenance practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

(Ref.: 40 CFR 63.6602, 63.6625(h), and Table 2c, Subpart ZZZZ)

- 3.B.16 Emission Point AA-031 is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) and 40 CFR Part 60, Subpart A - General Provisions, as specified in Table 8 of Subpart IIII.

(Ref: 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; 40 CFR 60.4200(a)(2)(i))

- 3.B.17 For Emission Point AA-031, the permittee shall comply, for the entire life of the engine, with the emission limitations for new non-road CI engines in 60.4202(a)(2) as outlined in Table 1 of 40 CFR 89.112: 4 g/kW-hr of NMHC + NO_x, 3.5 g/kW-hr of CO and 0.2 g/kW-hr of PM; The permittee shall also comply with the opacity limitations outlined in 40 CFR 89.113: 20 % during the acceleration mode; 15 % during the lugging mode; and 50 % during the peaks in either the acceleration or lugging modes.

(Ref.: 40 CFR 60.4205(b) and 60.4206, Subpart IIII)

- 3.B.18 For Emission Point AA-031, the permittee shall burn only fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or maximum aromatic content of 35% by volume, as outlined in 40 CFR 80.510(b) for non-road diesel fuel.

(Ref.: 40 CFR 60.4207(b), Subpart IIII)

- 3.B.19 For Emission Points AA-005, AA-006, AA-008, AA-009, AA-010, AA-013, and AA-014, if the cyclones associated with these emission points be proven inoperative for whatever the reason, the associated process line shall immediately cease all operations.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10))

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	$E = 4.1 * p^{0.67}$

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

- 3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of 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	Pollutant/Parameter	Limit/Standard
AA-000	40 CFR Part 63 Subpart DDDD	3.D.1	HAPs	Minimize Fugitive Emissions
AA-030	40 CFR Part 63 Subpart DDDD	3.D.2	HAP's	Only use Non-HAP containing coatings
AA-001 AA-002 AA-003	40 CFR Part 63 Subpart DDDDD, 63.7510(e), 63.7575, & Item 4 of Table 3	3.D.3	HAP's	Complete an energy assessment
	Beginning January 31, 2016			
	40 CFR Part 63 Subpart DDDDD, 63.7510(e), 63.7575(d), 6540(a)(10), & Table 3	3.D.4	HAP's	Initial and subsequent tune-up
	40 CFR 63.7500 and Items 5 and 6 of Table 3, Subpart DDDDD	3.D.5	HAP's	Startup and shutdown conditions

- 3.D.1 The permittee shall minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).

(Ref: 40 CFR 63.2241 and Table 3 of Subpart DDDD)

- 3.D.2 For Emission Point AA-030, the permittee shall only use non-HAP containing coatings in all operations defined as Group 1 Miscellaneous Coating Operations.

(Ref: 40 CFR 63.2241 and Table 3 of Subpart DDDD)

- 3.D.3 For Emission Points AA-001, AA-002, AA-003, the permittee must have a qualified energy assessor complete a one-time energy assessment as defined in 40 CFR 63.7575. For Emission Point AA-003 it must be completed by January 31, 2016 and for Emission Points AA-001 and AA-002 by January 31, 2017.

(Ref.: 40 CFR 63.7510(e), 63.7575 and Item 4 of Table 3 in Subpart DDDDD)

- 3.D.4 For Emission Points AA-001, AA-002, AA-003, the permittee shall conduct tune-ups every five years, with each tune-up being completed no more than 61 months after the previous tune-up. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down.

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

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

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

3.D.5 For Emission Points AA-001, AA-002 and AA-003, the permittee shall operate the boilers in accordance with the requirements found in (a) through (c) during periods of startup and shutdown:

- (a) For startup the permittee must use one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
- (b) Emissions must be vented to the main stacks and all control devices must be engaged if the permittee starts burning non-clean biomass during startup or shutdown.
- (c) All applicable records required by Condition 5.B.6 (g) and (h) must be kept during periods of startup and shutdown.

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

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (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).)
- 4.3 For Emission Points AA-001, AA-002, AA-003, are subject to and must comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. Per Compliance Extension Request letter dated June 4, 2015, the compliance date for Emission Points AA-001 and AA-002 is January 31, 2017 and for Emission Point AA-003 the compliance date is January 31, 2016.

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 AA-002 AA-003	40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63.7510(a), 63.7515(a) and (b), 63.7520(a),(b),(c),(d), and(e), 63.7530(a)and(b), 63.7545(d), and Table 5, Subpart DDDDD	5.B.1	PM, HCl, Hg and CO	Initial Compliance Testing
	40 CFR 63.7525(a) and 63.7575, Subpart DDDDD	5.B.2	CO	Installing an oxygen analyzer system
	40 CFR 63.7540(a)(1),(2)(ii) &(10) and (b), Items 1 and 10 of Table 8, Subpart DDDDD	5.B.3	PM, HCl, Hg and CO	Continuous compliance
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	PM/Fuel Usage	Monitoring, Recordkeeping, and Reporting
	40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD	5.B.5		Recordkeeping Requirements
AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-012 AA-017 AA-025 AA-026 AA-027	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	PM/PM ₁₀ & Opacity	Perform weekly visible emission observations which may include EPA Method 9 VEE.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-005 AA-006	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	5.B.7	PM/PM ₁₀ & Opacity	Stack testing in accordance with EPA Reference Methods 1-5, Method 201 or 201A in conjunction with Reference Method 202 and Method 9
AA-005 AA-006	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	5.B.8	PM/PM ₁₀ / Hours of Operation	Record the hours of operation
AA-004 AA-007 AA-017	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	5.B.9	VOC/ Total Maximum Production	Record the amount of veneer dried and plywood produced
AA-005 AA-006 AA-025	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	5.B.10	Maintenance Inspections	Monthly Records
AA-025	Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017	5.B.11	VOC/ Hours of Operation	Monitor and record hours of operation
AA-025 AA-027 AA-030	40 CFR Part 63, Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products; 40 CFR 63.2262	5.B.12	HAP's	Initial Compliance
	40 CFR 63.2269(a), Subpart DDDD	5.B.13		Continuous Parameter Monitoring System
	40 CFR 63.2269(b), Subpart DDDD	5.B.14		Continuous Temperature Monitoring System
	40 CFR 63.2262, Subpart DDDD	5.B.15		Continuous Monitor the Fire Box Temperature
	40 CFR 63.2271(a) and Table 8 of Subpart DDDD	5.B.16		Continuous Compliance
	40 CFR 63.2281 (a) and Table 9 of Subpart DDDD	5.B.17		Submission of Compliance Report
	40 CFR 63.2283(a) through (c), Subpart DDDD and Condition 5.A.3	5.B.18		Record Retention
	40 CFR 63.2281 (a) and Table 9 of Subpart DDDD	5.B.19		Submission of Compliance Report
	40 CFR 63.2281 (c)(1) through (6) and 63.2281 (e)(1) through (11), Subpart DDDD	5.B.20		Monitoring, Recordkeeping and Reporting (Deviations)
	40 CFR 63.2281 (e) and Table 9 of Subpart DDDD	5.B.21		Startup, Shutdown, Malfunction Plan (SSMP)
AA-027	40 CFR 63.2251, Subpart DDDD	5.B.22	HAP's	Monitoring, Recordkeeping, and Reporting for control device downtime in association with the RCDME (See Appendix B)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-028	40 CFR 63.6625(e), (f), and (i), 63.6640(a), and Table 6, Subpart ZZZZ	5.B.23	HAP's	Operating Requirement
	40 CFR 63.6655(e) and (f) and 63.6660 (b) and (c), Subpart ZZZZ	5.B.24		Recordkeeping
AA-005 AA-006 AA-008 AA-009 AA-010 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.25 and 5.B.26	PM	Maintenance, Monitoring, Recordkeeping and Reporting
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.27	PM/PM ₁₀ & Opacity	Monitoring, Recordkeeping, and Reporting
AA-031	Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; 40 CFR 60.4209(a)	5.B.28	Hours of operation	Install and maintain a Non-Resetable Hour Meter
	40 CFR 60.4211(a) & (c), Subpart IIII	5.B.29	Installation & Operation	Alternative Compliance Requirements
	40 CFR 60.4214(b), Subpart IIII	5.B.30	Installation & Operation	Recordkeeping

5.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate initial compliance with the PM, CO, HCl and Hg limitations found in Table 2 of 40 CFR Subpart DDDDD by stack testing and establishing operating limits. Stack testing must be performed in accordance with the requirements in 40 CFR 63.7520 and Table 5 of Subpart DDDDD by July 29, 2016 for Emission Point AA-003 and by July 29, 2017 for Emission Points AA-001 and AA-002, and submittal of the test report no later than sixty days after the testing is complete.

The permittee shall submit data on the operating load conditions, including steam flow rate and oxygen concentration in the firebox, observed during each of the performance test runs. This data will be used to set the allowable 30-day rolling average operating load and the minimum allowable oxygen trim system set point.

If the performance tests for a given pollutant (PM, CO, HCl and Hg) for at least 2 consecutive years (stack testing performed by July 29, 2016 and August 31, 2017; and stack testing performed July 29, 2017 and July 29, 2018) show that emissions are at or below 75 percent of the emission limit for the pollutant, and if there are no changes in

the operation of the individual boiler or air pollution control equipment that could increase emissions, the permittee may choose to conduct performance tests for the pollutant every third year (stack testing performed by August 31, 2020 or by August 31, 2021). Each such performance test must be conducted no more than 37 months after the previous performance test.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the 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(s).

The permittee must develop a site-specific test plan according to the requirements in 40 CFR 63.7(c) and upon request make available to MDEQ any records necessary to determine the conditions of the performance tests. The permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.

After the first successful submittal of an initial written test protocol in conjunction with the initial compliance test(s), the permittee may request that the resubmittal of a testing protocol be waived for subsequent testing by certifying in writing at least sixty (60) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed. If necessary, a pretest conference at least sixty (60) days prior to the scheduled test date may be requested to ensure that all test methods and procedures are acceptable to the DEQ.

(Ref.: 40 CFR Part 63, Subpart DDDDD- National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters ;40 CFR 63.7510(a)(1),(3), and (4), 63.7515(a) and (b), 63.7520(a),(b),(c),(d), and(e), 63.7530(a) and (b), 63.7545(d), and Table 5, Subpart DDDDD)

- 5.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall install, operate, and maintain an oxygen analyzer system. An oxygen analyzer system means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in the boiler or process heater flue gas, boiler or process heater, firebox, or other appropriate location. This includes oxygen trim systems. The source owner or operator must install, calibrate, maintain, and operate the oxygen analyzer system in accordance with the manufacturer's recommendations.

(Ref.: 40 CFR 63.7525(a) and 63.7575, Subpart DDDDD)

- 5.B.3 For Emission Points AA-001, AA-002 and AA-003, the permittee shall demonstrate continuous compliance with the emission limits, the work practice standards and the

operating limits according to the applicable methods listed in (a) through (g) of this Condition and specified in 40 CFR 63.7540 and Table 8 of Subpart DDDDD

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

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

- 5.B.4 For Emission Points AA-001 and AA-002 and AA-003, the permittee shall monitor and record the daily fuel usage rates. For Emission Point AA-001 and AA-002, the permittee shall, utilizing the fuel usage data, the heating value of the fuel and related information, maintain a log that reflects the heat input rate for each boiler. This data shall be maintained on site in log form in accordance with Condition 5.A.3 and shall be

made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

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

- 5.B.5 For Emission Points AA-001, AA-002 and AA-003, the permittee must keep all applicable records required in (a) through (i).
- (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting and Initial Notification and Notification of Compliance Status or semiannual compliance report you submitted according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - (b) Records of performance tests and other compliance demonstrations and performance evaluations as required by 40 CFR 63.10(b)(2)(xiv)
 - (c) Keep the records required by Condition 5.B.4 including records of all monitoring data and calculated averages for applicable operating limits, such as opacity and operating load, to show continuous compliance with each emission limit and operating limit that applies to you.
 - (d) Keep records of monthly fuel use by each boiler, including the types of fuel and amount used.
 - (e) Records of the occurrence and duration of each malfunction of the boilers and or the associated air pollution control equipment.
 - (f) Records of actions taken during periods of malfunction to minimize emissions in accordance with general duty to minimize emissions in 40 CFR 63.7500(a)(3), including corrective actions to restore the malfunctioning boilers, air pollution controls or monitoring equipment to normal or usual manner of operation.
 - (g) Maintain records of the calendar date, time, occurrence, and duration of each startup and shutdown.
 - (h) Maintain records of the types and amounts of fuels used during startup and shutdown.
 - (i) Retain the required records for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee is required to keep the records on site for a period of 2 years after the event and then they may be kept offsite for the remaining three years.

(Ref.: 40 CFR 63.7555, 63.7560 and 63.10(b)(2), Subpart DDDDD)

- 5.B.6 For Emission Points AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-012, AA-017, AA-025, AA-026, and AA-027, the permittee shall assure compliance with the opacity limitations (40%) by having a certified visible emission evaluation (VEE) reader conduct weekly visible emission observations during daylight hours for a six (6) minute period on each emission point, but may be conducted from a location allowing the observation of multiple emission points, simultaneously. In the event that no visible emissions are observed, no further action is required beyond documentation of the observation. If visible emissions (not including condensed water vapor) are observed, which appear to be in excess of 40%, a certified visible emission evaluation (VEE) reader shall perform visible emission evaluation (VEE) using EPA Reference Method 9 for a minimum of eighteen (18) consecutive minutes. Records of these readings shall be maintained on a VEE log sheet. If the visible emissions, after a period of six (6) minutes, are determined to be less than 10% opacity, then the reader can elect to discontinue doing the VEE. If conditions are such that opacity readings cannot be taken using Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity observations.

The permittee shall maintain a summary report in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

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

- 5.B.7 For Emission Points AA-005, and AA-006, the permittee shall demonstrate compliance with particulate matter (PM), PM₁₀, and Opacity emission limitations by performing a stack test in accordance with EPA Reference Methods 1-5, Method 9, and Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M during the second quarter of a calendar year beginning with 2017 and biennially, thereafter. During stack testing, permittee shall monitor process throughput in order to determine compliance with the applicable requirement.

The permittee shall submit said test report within 60 days of performance of the test. For the purpose of compliance demonstration, the permittee shall operate the sources within 20% of their maximum rated capacity or at a rate identified in the pretest conference.

If the permittee plans to use a test method, procedure, or operating condition that differs from the requirements of this permit herein, then a pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the DEQ. Also if the permittee elects to demonstrate compliance with the PM₁₀ limitations by testing only for PM using Reference Method 1-5, should the results reflect exceedances with the PM₁₀, DEQ will view this as a non-compliance issue. Further the DEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s).

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

Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 5.B.8 For Emission Points AA-005, and AA-006, the permittee shall record the hours of operation on both a daily basis and a consecutive 365-day period total. These daily records shall be kept in log form in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). and Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 5.B.9 For Emission Points AA-004 and AA-007, the permittee shall record the amount of veneer dried in sf (3/8" basis) on both a daily basis and a consecutive 365-day period total. For Emission Point AA-017, the permittee shall record the total amount of plywood produced in sf (3/8" basis) on both a daily basis and a consecutive 365-day period total.

All records shall be kept in log form in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2) and Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 5.B.10 For Emission Points AA-005, AA-006, and AA-025, inspections shall be performed each month, or more often as needed, and maintenance shall be performed as directed by inspection results so that proper operation of the pollution control device is maintained. Records of any inspections, maintenance and downtime of the pollution control device which should coincide with the operation of the designated emission unit shall be kept in log form in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

The permittee shall maintain on site at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment.

(Ref: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 5.B.11 For Emission Point AA-025, the permittee shall record the hours of operation of the Regenerative Thermal Oxidizer (RTO1) and the 22-Section Veneer Dryer on both a daily basis and a consecutive 365-day period total. These daily records shall be kept in log form in accordance with Condition 5.A.3 and shall be made available upon request

from DEQ personnel. The permittee shall submit a summarized report of this data in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2) and Federally Enforceable PSD Permit to Construct issued August 16, 2000 and modified June 9, 2017)

- 5.B.12 For Emission Points AA-025 and AA-027 the permittee shall conduct performance tests and establish operating requirements according to 40 CFR 63.2262 of Subpart DDDD.

(Ref.: 40 CFR Part 63, Subpart DDDD- National Emission Standards for Hazardous Air Pollutants; Plywood and Composite Wood Products; 40 CFR 63.2262)

- 5.B.13 For Emission Points AA-025 and AA-027, 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), Subpart DDDD)

- 5.B.14 For Emission Points AA-025 and AA-027, 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), Subpart DDDD)

5.B.15 Emission Points AA-025 and AA-027, the permittee shall establish the thermal oxidizer operating requirements using the following procedures:

- (a) During the performance test, the permittee shall continuously monitor the firebox temperatures during each of the required 1-hour test runs. For the regenerative thermal oxidizers, the temperature may be measured in multiple locations (e.g., one location per burner) in the combustion chamber and the average of the temperature measurements shall be calculated prior to reducing the temperature data to 15-minute averages for purpose of establishing the minimum firebox temperatures. The minimum firebox temperatures must be then established as the average of the three minimum 15 –minute firebox temperatures monitored during the three test runs. Multiple three run performance tests may be conducted to establish a range of parameter values under different operating conditions.
- (b) The permittee may establish a different minimum firebox temperature for the thermal oxidizer by submitting the notification specified in 40 CFR 63.2280(g) and conducting a repeat performance test.

(Ref.: 40 CFR 63.2262, Subpart DDDD)

5.B.16 The permittee shall demonstrate continuous compliance with the work practice standards outlined in Condition 3.D.1 by documenting that the facility is following the facility's plan for minimizing emissions which was submitted with the Notification of Compliance Status as required in 63.2265.

The permittee shall demonstrate continuous compliance with the work practice standard outlined in Condition 3.D.2 by continuing to use non-HAP coatings and by keeping records showing that you are using non-HAP coatings.

(Ref: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD)

- 5.B.17 For Emission Points AA-025, AA-027 and AA-030, the permittee shall keep a copy of the following records:
- (a) A copy of each notification and report submitted to comply with Subpart DDDD, including all documentation used to support the Initial Notification or the Initial Notification of Compliance Status.
 - (b) A copy of each record required in Tables 7 and 8 of Subpart DDDD to document continuous compliance with Conditions 3.B.9, 3.B.10, 3.B.11, 3.D.1 and 3.D.2.
- (Ref. 40 CFR 63.2282(a) and (b), Subpart DDDD)
- 5.B.18 A copy of the records required in Condition 5.B.18 must be kept for a period of five years. Each record must be kept on site for a period of 2 years from the date it was created or obtained. The records can be kept offsite for the remaining 3 years. All records must be kept in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1) and Condition 5.A.3.
- (Ref: 40 CFR 63.2283(a) through (c), Subpart DDDD)
- 5.B.19 For Emission Point AA-027, the permittee shall maintain detailed records of the control device downtime that occurs as a result of one of the maintenance activities outlined in the Routine Control Device Maintenance Exemption (RCDME) during process uptime. These records shall be maintained on a 365-day rolling total and maintained in accordance with Condition 5.A.3. Further these records shall be reported to DEQ in accordance with Condition 5.A.4.
- (Ref.: 40 CFR 63.2251 and Appendix C, Subpart DDDD)
- 5.B.20 For Emission Points AA-025 and AA-027, the permittee shall submit a compliance report in accordance with Condition 5.A.4 of this permit that includes the required information contained in 63.2281(c)(1) through (8).
- (Ref.: 40 CFR 63.2281(a) and Table 9 of Subpart DDDD)
- 5.B.21 For Emission Points AA-025 and AA-027, the permittee shall report all required information from 40 CFR 63.2281(c)(1) through (6) and 63.2281 (e)(1) through (11) for the following information for any deviation recorded by the temperature monitoring sensor. This includes periods of startup, shutdown, and malfunction.
- (Ref.: 40 CFR 63.2281(e) and Table 9 of Subpart DDDD)
- 5.B.22 The permittee shall also submit an immediate report for any startup, shutdown, or malfunction if there is a startup, shutdown or malfunction during the reporting period that is not consistent with the SSMP required in Condition 3.B.10. This report shall include all actions taken as a result of the event and shall be sent to the DEQ within two working days after starting actions inconsistent with the SSMP. All information

required in 63.10(d)(5)(ii) shall be submitted to the DEQ within seven working days after the end of the event.

(Ref.: 40 CFR 63.2281(e) and Table 9 of Subpart DDDD)

- 5.B.23 For Emission Point AA-028, the permittee shall comply with the following monitoring, operating, and maintenance requirements:
- (a) Operate and maintain the stationary RICE in accordance with the manufacturer's emission-related written instructions or develop a maintenance plan that provides, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;
 - (b) The permittee must install a non-resettable hour meter, if not already installed;
 - (c) The permittee may utilize an oil analysis program in order to extend the specified oil change requirement provided the analysis analyzes the parameters identified in 40 CFR 63.6625(i).

(Ref.: 40 CFR 63.6625(e), (f), and (i), 63.6640(a), and Table 6, Subpart ZZZZ)

- 5.B.24 For Emission Point AA-028, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:
- (a) All maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in 5.B.21(b);
 - (b) The hours of operation of the engine recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the event as an emergency, and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6655(e) and (f) and 63.6660 (b) and (c), Subpart ZZZZ)

- 5.B.25 For Emission Points AA-005, AA-006, AA-008, AA-009, AA-010, AA-013, and AA-014, the permittee shall monitor daily operations such that all downtime of any of the cyclones associated with these emission points is documented and maintained in log form. In the event of the failure of a cyclone, the permittee shall cease operations until such time as repairs are made and the maximum control efficiency of the cyclone is restored. Records of any and all maintenance and/or inspections must be kept at the facility and made available for review during any visit by DEQ personnel. A

summarized report of these records shall be submitted to DEQ in accordance with Condition 5.A.4. This data shall be maintained in accordance with Condition 5.A.3.

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

- 5.B.26 For Emission Points AA-005, AA-006, AA-008, AA-009, AA-010, AA-013, and AA-014, the permittee shall perform weekly maintenance and/or inspections for proper operation of the cyclones and shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the cyclones. In the event of failure of a cyclone, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the cyclone is restored. Records of any and all maintenance and/or inspections must be kept at the facility and made available for review during any visit by DEQ personnel. A summarized report of these records shall be submitted to DEQ in accordance with Condition 5.A.4. This data shall be maintained in accordance with Condition 5.A.3.

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

- 5.B.27 For Emission Points AA-001, AA-002, and AA-003, the permittee shall assure compliance with the opacity limitation (40%) by having an EPA Reference Method 9 certified observer performing a weekly Visible Emission Evaluation (VEE) during daylight hours for a minimum of six (6) consecutive minutes (24 observations at 15 second intervals). Records of these evaluations shall be kept and shall be made available for inspection by DEQ upon request. If the VEE results in visible emissions greater than 20%, then another VEE shall be performed within the hour of the initial VEE using EPA Reference Method 9. The secondary VEE shall be performed for six eighteen (18) consecutive minutes, and opacity reading shall be determined on a six (6) consecutive minutes rolling basis. If visible emissions (not including condensed water vapor) are observed above 25% opacity, the permittee shall initiate corrective action immediately that minimizes the visible emissions. If the corrective action within 24 hours does not result in visible emissions below 25% being observed from the emission point, the permittee shall notify DEQ in writing within five (5) working days. Further, the permittee shall continue to conduct VEE's for 30 consecutive minutes once per daylight shift until the corrective action rectifies the opacity problem. Should this opacity problem continue beyond 5 working days the permittee shall demonstrate compliance with the PM emission limitations by stack testing according to EPA Reference Methods 1-5 and submittal of the said stack test report within 120 days of DEQ's receipt of the permittee's letter.

If conditions are such that opacity readings cannot be taken using the EPA Reference Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform the VEE.

The permittee shall maintain a summary report in accordance with Condition 5.A.3 and shall be made available upon request from DEQ personnel. The permittee shall submit

a summarized report of this data in accordance with Condition 5.A.4.

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

- 5.B.28 For Emission Point AA-031, the permittee shall install a non-resettable hour meter prior to startup of the engine.

(Ref: 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; 40 CFR 60.4209(a), Subpart IIII)

- 5.B.29 For Emission Point AA-031, if the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, as required in this permit, or the emission-related settings are changed in a way that is not permitted by the manufacturer, compliance must be demonstrated as follows:

- (a) Must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) Must conduct an initial performance test as described in 40 CFR 63.4212 to demonstrate compliance with the emission standards in Condition 3.B.17 within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(Ref: 40 CFR 60.4211(g), Subpart IIII)

- 5.B.30 For Emission Point AA-031, the permittee shall keep records of the operation of the engine in 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. The records shall be maintained in accordance with Condition 5.A.3.

(Ref: 40 CFR 60.4214(b) and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2))

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-001 AA-002 AA-003	40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9 Subpart DDDDD	5.C.1		Notification of Compliance Status
	40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9, Subpart DDDDD	5.C.2		Submit semi-annual report

5.C.1 For Emission Points AA-001, AA-002 and AA-003, the permittee shall submit a Notification of Compliance Status to MDEQ, by the end of the 60th day following the completion of all performance tests. The Notification of Compliance Status report must include the following (a) through (j) for each unit as applicable:

- (a) A description of the affected unit including identification of which subcategory the unit is in, the design heat input capacity of the unit, and description of the fuel burned in the unit.
- (b) Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance including all established operating limits, and including:
 - (1) Identification of whether you are complying with the PM emission limit or the alternative TSM emission limit.
 - (2) Identification of whether you are complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits.
- (c) A summary of the maximum CO emission levels recorded during the performance test to show that the permittee has met the applicable emission standard.
- (d) Identification of whether the permittee plans to demonstrate compliance with each applicable emission limit through performance testing or CEMS
- (e) Identification of whether the permittee plans to demonstrate compliance by emissions averaging and identification of whether the permittee plans to demonstrate compliance by using efficiency credits through energy conservation:

- (1) If you plan to demonstrate compliance by emission averaging, report the emission level that was being achieved or the control technology employed on January 31, 2013.
- (f) If there was a deviation from any emission limit, work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
- (g) A certification stating “This facility has met all applicable emission limits and work practice standards.”
- (h) A certification stating “This facility has had an energy assessment performed according to the procedures listed in Table 3 to Subpart DDDDD of Part 63—Work Practice Standards.”
- (i) A certification stating “This facility complies with the required tune-up according to procedures listed in 40 CFR 63.7540(a)(10) (i) through (vi).”
- (j) A certification stating “No secondary materials that are solid waste were combusted in any affected unit.”

(Ref.: 40 CFR 63.7530(e) and 63.7545(e)(1) through (8), Subpart DDDDD)

5.C.2 For Emission Points AA-001, AA-002 and AA-003, the permittee shall submit the information listed in (a) through (f) in accordance with the semi- annual reporting requirements listed in Condition 5.A.4 of this permit.

- (a) Company and Facility name and address
- (b) Process unit information, emission limits and operating limits
- (c) Date of report and beginning and ending dates of reporting period.
- (d) The total fuel use by the boiler within the reporting period, including but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by EPA or the permittee’s basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.
- (e) If the permittee is conducting performance test every 3 years, the date of the last two performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
- (f) Statement indicating that the permittee has burned no new types of fuel in the boilers.

- (g) If there are no deviations from any emission limits and operating limits, a statement that there were no deviations from the emission limits and operating limits during the reporting period.
- (h) If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period that may have caused or caused an emission limit to be exceeded. Also, include a description of any actions taken by the permittee during the malfunction of the boiler or air pollution control devices to minimize emissions, including what actions were taken to correct the malfunction
- (i) For every instance of startup or shutdown include the information required to be monitored, collected, or recorded by Condition 5.B.6 (g) and (h).
- (j) For each deviation from an emission limit or operating limit the compliance report must additionally contain:
 - (1) A description of the deviation and which emission limit or operating limit from which you deviated
 - (2) Information on the number, duration, and cause of deviations (including unknown cause) and the corrective action taken.
 - (3) If the deviation occurs during an annual performance test, provide the date the annual performance test was completed.
- (k) 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
- (l) Results of any performance tests and compliance reports identified in 40 CFR 40 CFR 63.7550(h)(1) through (3) shall be submitted to EPA's WebFIRE database using the Compliance and Emissions Data Reporting Interface that can be accessed through EPA's Central Data Exchange (CDX – www.epa.gov/cdx) unless the reporting form specific to this subpart is not available in CEDRI at the time that the report is due. All performance tests and compliance reports identified in 40 CFR 63.7550(h)(1) through (3) shall also be submitted to MDEQ.

(Ref.: 40 CFR 63.7550(a),(b),(c), (d), and (h) and Table 9, Subpart DDDDD)

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. Episodes	Regulations for the Prevention of Air Pollution Emergency
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

**HOOD INDUSTRIES, INC. WIGGINS MILL, ROUTINE CONTROL DEVICE
MAINTENANCE EXEMPTION (RCDME) FOR EMISSION POINT AA-027**