

**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: February 9, 2006
Date Modified: September 29, 2008
Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: January 31, 2011

Permit No.: 2540-00003

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

APPENDIX B 40 CFR 82 - PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C 40 CFR 63 SUBPART DDDD - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: PLYWOOD AND COMPOSITE WOOD PRODUCTS

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.: APC-S-6, Section III.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.: APC-S-6, Section III.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.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-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 judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.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.: APC-S-6, Section VI.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.: APC-S-6, Section VI.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.: APC-S-6, Section VI.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.: APC-S-6, Section VI.C.)

- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)

- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
 - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)

- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)

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

- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by APC-S-1, Section 2.34)
 - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
 - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
 - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action

brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;
 - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

- 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Perry Smith, 65 MMBTU/HR, woodwaste boiler with a Multiclone Collector
AA-002	Perry Smith, 65 MMBTU/HR, woodwaste boiler with Multiclone Collector
AA-003	Erie City, 90 MMBTU/HR, woodwaste boiler with Zurn Multiclone Collector
AA-004	Three cooling zones from the 23-section Plywood Veneer Dryer (Dryer2).
AA-005	Sander Dust Quad-Pak Cyclone. (Fisher Klosterman, XQ-120-27-4 Quad-Pak cyclone (four cyclones in parallel)). This set of cyclones separates the sander dust collected from the Kimwood Wide Belt, 4-head Plywood Sander and 1-head sander.
AA-006	Sander Dust High Pressure Relay Cyclone (Fisher Klosterman, XQ-120-10) located at the wood/bark fired boilers. This cyclone receives dust from the Quad-Pak.
AA-007	Three cooling zones from the 17-section Plywood Veneer Dryer (Dryer1).
AA-008	Dry Veneer Waste Cyclone. Dry veneer waste from various stages of production, are routed to a waste hog for processing and separation.
AA-009	Dry Veneer Waste Cyclone. Dry veneer waste from various stages of production, are routed to a particle separator for transport.
AA-010	Log Yard Fines Cyclone. Log yard chip fines from green wood are separated and collected.
AA-011	Log Yard Surge Bin. Storage bin for log yard chips.
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.
AA-019	Fugitive Dust Point. Fugitive emissions generated from Log Saws, Lilly Pad Chipper, 96" Chipper, Cone Mill Knife/Chipper/Saw, Veneer Lathe Chipper, Veneer Lathes, and Log Debarker.
AA-025	Three heated drying zones of the 22 section veneer dryer emissions controlled by Regenerative Thermal Oxidizer # 1 (RTO1).
AA-026	Three cooling zones from the 22-section Plywood Veneer Dryer (Dryer3).
AA-027	Three heated drying zones of the 17- and 23-section veneer dryer emissions controlled by Regenerative Thermal Oxidizer #2 (RTO2).

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.: APC-S-1, Section 3.1)
- 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.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003	APC-S-1, Section 3.4(b)	3.B.1 & 3.B.3	PM	0.3 grains per standard dry cubic foot
	APC-S-1, Section 4.1(a)	3.B.2 & 3.B.3	SO ₂	4.8 lbs/MMBTU
	Title V Operating Permit issued May 5, 2000, modified December 5, 2000 and April 8, 2004.	3.B.11	Operational Restriction	For Emission Points AA-001 and AA-002, the permittee shall not exceed 65 MMBTUh heat input capacity.
	APC-S-1, Section 3.1(a)(b)(c)	3.A.1	Opacity	40%
AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-017 AA-025 AA-026 AA-027	APC-S-1, Section 3.2	3.A.2 & 1.19	Opacity	40%
AA-004 Through AA-017 AA-019 AA-025 AA-026 AA-027	APC-S-1, Section 3.6(a)	3.B.4 & 3.B.3	PM	$E = 4.1p^{0.67}$
AA-005 And / or AA-006	Limitations established in the Federally Enforceable Permit to Construct issued March 24, 1997.	3.B.5 & 3.B.3	PM	5,616 hours per year per emission point
AA-005	Federally Enforceable Permit to Construct issued March 24, 1997 and modified August 16, 2000.	3.B.5 & 1.19	PM/ PM ₁₀	3.0 lbs/hr & 8.4 TPY 1.5 lbs/hr & 4.2 TPY
AA-006	Federally Enforceable Permit to Construct issued March 24, 1997 and modified August 16, 2000.	3.B.5 & 1.19	PM PM ₁₀	1.0 lbs/hr & 2.8 TPY 0.4 lbs/hr & 1.1 TPY

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-025	Federally Enforceable Permit to Construct issued August 16, 2000.	3.B.6	Hours of Operation	The 22 Section Veneer Dryer shall be operated with the Regenerative Thermal Oxidizer.
		3.B.7	PM	0.7 lbs/hr and 3.1 tons/year
			PM ₁₀	0.56 lbs/hr and 2.5 tons/year
			VOC	5.4 lbs/hr and 23.7 tons/year
AA-026	Federally Enforceable Permit to Construct issued August 16, 2000.	3.B.8	VOC	1.4 lbs/hr and 6.1 tons/year
AA-004 AA-007	Federally Enforceable Permit to Construct issued August 16, 2000.	3.B.9	Total Maximum Production	191 MM sf/year (3/8" basis)
AA-017	Federally Enforceable Permit to Construct issued August 16, 2000.	3.B.10	Total Maximum Facility Production	274 MM sf/year (3/8" basis)
AA-004 AA-007 AA-025 AA-026 AA-027	40 CFR 63 Subpart DDDD, no later than October 1, 2008	3.B.12 3.B.13 3.B.15	HAPs	In accordance with compliance alternatives in 40 CFR Part 63, Subpart DDDD, Table 1B
AA-025 AA-027		3.B.14 3.B.16 through 3.B.20		In accordance with compliance alternatives in 40 CFR Part 63, Subpart DDDD, Table 1B and Table 2

3. B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee is allowed a particulate matter emission rate up to 0.3 grains per standard dry cubic foot for each boiler.
(Ref: APC-S-1, Section 3.4 (b))
3. B.2 For Emission Points AA-001, AA-002, and AA-003, 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: APC-S-1, Section 4.1 (a))
3. B.3 For Emission Points AA-001 through AA-017, AA-019, AA-025, AA-026, and AA-027, the mass emission limitations for particulate matter and sulfur dioxide are further limited by Paragraph 1.19 which restricts facility modifications without prior permit approval.
(Ref: APC-S-2, Section B.12)
3. B.4 For Emission Points AA-004 through AA-017, AA-019, 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.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: APC-S-1, Section 3.6(a))

3. B.5 The permittee shall not operate Emission Points AA-005 and/or AA-006 more than 5,616 hours/year in any consecutive 365-day period. The permittee shall not operate either the Kimwood Wide Belt, 4-head Plywood Sander or the existing plywood sander without controlling the PM/PM₁₀ emissions using the cyclones designated in Emission Points AA-005 and AA-006, and shall not exceed the following emission limits:
for Emission Point AA-005 - for PM emissions – 3.0 lbs/hr and 8.4 tons/yr,
for PM₁₀ emissions – 1.5 lbs/hr and 4.2 tons/yr,
for Emission Point AA-006 - for PM emissions – 1.0 lbs/hr and 2.8 tons/yr,
for PM₁₀ emissions – 0.4 lbs/hr and 1.1 tons/yr.
(Ref.: Federally Enforceable Permit to Construct issued March 24, 1997, and modified August 16, 2000)
3. B.6 For Emission Point AA-025 the permittee shall not operate the 22-section Veneer Dryer without the use of the Regenerative Thermal Oxidizer #1 (RTO1). In the event of a failure of the RTO1 while the Veneer Dryer is in operation, the permittee shall cease feed to the 22-section Veneer Dryer. The Veneer Dryer will continue to operate without RTO1 until the Veneer Dryer is empty. The permittee shall not commence operation of the Veneer Dryer until such time as repairs are made and the proper efficiency of the RTO1 is restored. Such air emissions equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

(Ref.: Federally Enforceable Permit to Construct issued August 16, 2000, and modified upon issuance of this permit.)
3. B.7 Emissions from Emission Point AA-025 shall not exceed the following emission limits: for PM emissions – 0.7 lbs/hr and 3.1 tons/yr, for PM₁₀ emissions – 0.56 lbs/hr and 2.5 tons/yr, and for VOC emissions – 5.4 lbs/hr and 23.7 tons/yr
(Ref.: Federally Enforceable Permit to Construct issued August 16, 2000)
3. B.8 Emissions from Emission Point AA-026 shall not exceed 1.4 lbs/hr and 6.1 tons/yr for VOC emissions.
(Ref.: Federally Enforceable Permit to Construct issued August 16, 2000)

3. B.9 For Emission Points AA-004 and AA-007, the permittee shall be limited to a total maximum production of 191 MM sf/year (3/8" basis) through both veneer dryers.
(Ref.: Federally Enforceable Permit to Construct issued August 16, 2000)
3. B.10 For Emission Point AA-017, the permittee shall be limited to a total maximum facility production of 274 MM sf/year (3/8" basis) at the plywood presses.
(Ref: Federally Enforceable Permit to Construct issued August 16, 2000)
3. B.11 For Emission Points AA-001 and AA-002, the permittee shall not exceed a heat input capacity of 65 MMBTUH.
(Ref: Title V Operating Permit issued May 5, 2000 and modified December 5, 2000 and April 8, 2004)
3. B.12 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-027 are affected by and shall comply with the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (40 CFR Part 63, Subpart DDDD) and the General Provisions (40 CFR Part 63, Subpart A). A copy of the National Emission Standards for Plywood and Composite Wood Products is provided as supplemental information in Appendix D of this permit.
(Ref.: 40 CFR 63.2231 and Table 10 of Subpart DDDD)
3. B.13 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-027, the permittee shall comply with the compliance options, operating requirements, and work practice requirements no later than October 1, 2008.
(Ref: 40 CFR 63.2233)
3. B.14 For Emission Points AA-025 and AA-027, the permittee must meet a limit determined in accordance with compliance alternatives in 40 CFR 63, Subpart DDDD, Table 1B.
(Ref: 40 CFR 63.2240(b) and Table 1B of Subpart DDDD)
3. B.15 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-027, 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 Part 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CR 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

- (b) The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(3)(1)(i).
- (c) The permittee shall develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3).
(Ref: 40 CFR 63.2250)

3. B.16 For Emission Points AA-025 and AA-027, the permittee shall comply with one of the following six compliance options:

- (a) Reduce emissions of total HAPs, measured as THC, by 90 percent; or
- (b) Limit emissions of total HAP, measured as THC (as carbon) to 20 ppmvd; or
- (c) Reduce methanol emissions by 90 percent; or
- (d) Limit methanol emissions to less or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (e) Reduce formaldehyde emissions by 90 percent or;
- (f) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

(Ref: MACT Subpart DDDD, Table 1B)

3. B.17 For Emission points AA-025 and AA-027, the permittee shall establish the thermal oxidizer operating requirements using the following procedure:

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

repeat performance test as specified in paragraph 3.B.17(a) of this permit that demonstrates compliance with the applicable compliance options of Subpart DDDD. (Ref: 40 CFR 63.2262)

3.B.18 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 bloc 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: MACT Subpart DDDD, Table 2)

3.B.19 For Emission Points AA-025 and AA-027 the permittee shall develop a plan for review and approval by the DEQ for minimizing fugitive emission from the veneer dryer heated zones. (Ref: 40 CFR 63.2265)

3.B.20 For Emission Points AA-025 and AA-027 the permittee shall limit operations conducted under the Routine Control Device Maintenance Exemption to periods that must not exceed 0.5% of the annual operating uptime for each process unit controlled. (Ref: 40 CFR 63.2251(b)(2))

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1 & 1.19	PM	0.6 lbs/MMBTU or as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2 & 1.19	SO ₂	4.8 lbs/MMBTU or as otherwise limited by facility modification restrictions
APS-S-1, Section 3.6(a)	3.C.3 1.19	PM	$E = 4.1 p^{0.67}$ Or as otherwise limited by facility modification restrictions.

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: APC-S-1, Section 3.4(a)(1))

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: APC-S-1, Section 4.1(a))

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.: APC-S-1, Section 3.6(a))

D. Work Practice Standards

- 3.D.1 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-027, 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 MACT Subpart DDDD Table 3)

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.: APC-S-6, Section III.C.5.a.,c.,&d.)
- 4.3 The permittee is subject to and shall comply with the applicable requirements of 40 CFR 63, Subpart DDDD, the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD. Unless the rule is subsequently amended, the permittee shall comply with the requirements of Subpart DDDD as specified in Conditions 3.B.12 through 3.B.20, 3.D.1, and 5.B.11 through 5.B.21 of this permit, no later than October 1, 2008.

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
 - (b) the date(s) analyses were performed;
 - (c) the company or entity that performed the analyses;
 - (d) the analytical techniques or methods used;
 - (e) the results of such analyses; and
 - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))

- 5.A.3 Except as otherwise specified herein, 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.: APC-S-6, Section III.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 APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.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.: APC-S-6, Section III.A.3.c.(2))
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001 AA-002 AA-003	PM	Stack testing	5.B.1 5.B.3	For determination of compliance with State Regulation APC-S-1 Section 3.4 (b)
		Fuel usage rate	5.B.2	For determination of compliance with APC-S-6 Section III.A.3 (2).
AA-005 And AA-006	PM	Stack testing	5.B.5 5.B.3	For determination of compliance with State Regulation APC-S-5 and the Federally Enforceable Permit Issued on August 16, 2000.
		Hours of operation	5.B.6	For determination of compliance with State Regulation APC-S-6 Section III.A.3 (2) and the Federally Enforceable Permit Issued on August 16, 2000.
AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-017, AA-025, AA-026, AA-027	PM	Daily Opacity Observations	5.B.4	For determination of compliance with State Regulation APC-S-1, Section 3.2
AA-004, AA-007, AA-017	VOC/ Total Maximum Production	Daily Recordkeeping	5.B.7	For determination of compliance with State Regulation APC-S-5.
AA-005, AA-006, AA-025	Maintenance Inspections	Monthly Records	5.B.8	For determination of compliance with State Regulation APC-S-5 and the Federally Enforceable Permit Issued on August 16, 2000.
AA-025	VOC/ Hours of Operation	Monitor and Record Hours of Operation	5.B.9	For determination of compliance with State Regulation APC-S-5 and the Federally Enforceable Permit Issued on August 16, 2000.

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
	VOC/ Temperature	Monitor and Record Operational Temperature	5.B.10	For determination of compliance with State Regulation APC-S-5 and Title V Operating Permit issued May 5, 2000.
AA-004 AA-007 AA-025 AA-026 AA-027	HAP	Initial Compliance	5.B.11 5.B.12 5.B.15	§63.2260(a) §63.2260(b) §63.2265
		Performance Tests	5.B.13 5.B.14	§63.2261(a) §63.2262
		Recordkeeping	5.B.17 5.B.18	§63.2282(a),(b) §63.2283(a),(b),(c)
		Startup, Shutdown, Malfunction Plan (SSMP)	5.B.19 5.B.20	§63.2250(c) §63.2271(b)(1)
		Continuous Compliance	5.B.16	§63.2271(a)
AA-025 AA-027	Hours of Operation	The permittee shall monitor and document with recordkeeping the hours of operation of each unit each day, the hours of operation of each unit under the Routine Control Device Maintenance Exemption, and the 12-month rolling totals of each.	5.B.21	§63.2251

5.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with particulate matter limitations by stack testing in accordance with EPA Reference Methods 1-5.

For Emission Points AA-001 and AA-002, the testing shall be done on a rotating basis. The stack testing shall cycle between emission points AA-001 and AA-002 on a biennial basis.

For the purpose of compliance demonstration the permittee shall operate the sources within 80% of their maximum heat input capacity.

For Emission Point AA-003, a stack test report shall be submitted by July 31, 2007, and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the source within 80% of the heat input capacity. (Ref: Title V Operating Permit issued May 5, 2000, and modified December 5, 2000 and April 8, 2004)

- 5.B.2 For Emission Points AA-001 and AA-002, the permittee shall monitor the daily fuel usage rates. The permittee shall retain these records for a minimum of five (5) years, as outlined in Condition 5.A.3. (Ref: APC-S-6, Section III.A.3 (2)).
- 5.B.3 The permittee shall submit a written test protocol at least thirty (30) days prior to the scheduled test date(s) to ensure that all test methods and procedures are acceptable to DEQ. Also, the permittee shall notify DEQ in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be scheduled to witness the test. (Ref: Federally Enforceable Permit to Construct issued on March 24, 1997 and modified on August 16, 2000)
- 5.B.4 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-017, AA-025, AA-026, and AA-027, the permittee shall perform daily opacity observations and maintain a log of the results. If any visible emissions are detected which are equal to or greater than 10%, then the permittee shall perform opacity evaluations in accordance with EPA Reference Method 9, 40 CFR 60, Appendix A. If conditions are such that opacity readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. The permittee shall submit a summary report of the required monitoring in accordance with Section 5.A.4 of this document. (Ref: Title V Operating Permit issued May 5, 2000 and modified December 5, 2000 and April 8, 2004.
- 5.B.5 For Emission Points AA-005 and AA-006, the permittee shall demonstrate compliance with particulate matter emission limitations, as stated in 3.B.5 and 3.B.6, by stack testing in accordance with EPA Reference Methods 1-5 and shall demonstrate compliance with PM₁₀ emission limitations by stack testing in accordance with EPA Reference Method 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M and submittal of a stack test report, and biennially thereafter. During stack testing, permittee shall monitor process throughput in order to determine compliance with the applicable requirement. (Ref: Federally Enforceable Permit to Construct issued on March 24, 1997 and modified on August 16, 2000)
- 5.B.6 The permittee shall record the hours of operation of Emission Points AA-005 and AA-006 on both a daily basis and a consecutive 365-day period total. These daily records shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. All records shall be maintained by the permittee for a period of five years following the date of such record. The permittee shall submit a semi-annual report detailing the hours of operation of Emission Points AA-005 and AA-006 on both a daily basis and a consecutive 365-day period total within 30 days of the end of each semi-annual period. (Ref: Federally Enforceable Permit to Construct issued on March 24, 1997 and modified on August 16, 2000)
- 5.B.7 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 and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. All records shall be maintained by the permittee for a period of five years following the date of such record. The permittee shall submit a semi-annual report detailing the combined production rates for Emission Points AA-004 and AA-007, and the total facility production rate for Emission Point AA-017, on both a daily basis and a consecutive 365-day period total within 30 days of the end of each semi-annual period. (Ref: Federally Enforceable Permit to Construct issued on August 16, 2000)

- 5.B.8 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 equipment is maintained. Records of any inspections and/or maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by DEQ personnel.

The permittee shall maintain on site at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. (Ref: Federally Enforceable Permit to Construct issued on August 16, 2000)

- 5.B.9 The permittee shall record the hours of operation of the Regenerative Thermal Oxidizer #1 (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 and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. All records shall be maintained by the permittee for a period of five years following the date of such record. The permittee shall submit a semi-annual report detailing the hours of operation on both a daily basis and a consecutive 365-day period total within 30 days of the end of each semi-annual period. (Ref: Federally Enforceable Permit to Construct issued on August 16, 2000)

- 5.B.10 The permittee shall monitor and record the operational temperature of the Regenerative Thermal Oxidizer #1 (RTO1) on a continuous basis. The continuous recorder charts shall be kept at the facility and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. All records shall be maintained by the permittee for a period of five years following the date of such record. The permittee shall submit as part of the semi-annual report, a summary of the operational temperature of the RTO1 during the reporting period, within 30 days of the end of each semi-annual period. The Regenerative Thermal Oxidizer shall be operated within manufacturer's guidelines to insure proper efficiency.
(Ref: Title V Operating Permit issued May 5, 2000, and modified December 5, 2000 and April 8, 2004)

- 5.B.11 To demonstrate initial compliance with the compliance options and operating requirements, the permittee shall conduct performance tests and establish each site-specific operating requirement in Table 2 of Subpart DDDD according to the requirements in §63.2262 and Table 4 of Subpart DDDD.

(Ref: 40 CFR 63.2260(a))

- 5.B.12 For Emission Points AA-025 and AA-027, the permittee shall demonstrate initial compliance with each compliance option, operating requirement, and work practice standard that applies according to Tables 5 and 6 of Subpart DDDD and according to 63.2260 through 63.2269 of Subpart DDDD.
(Ref: 40 CFR 63.2260(b) and Table 5 of Subpart DDDD)
- 5.B.13 The permittee shall conduct performance tests no later than March 30, 2009, or as subsequently amended, according to §63.7(a)(2) of Subpart A.
(Ref: 40 CFR 63.2262)
- 5.B.14 For Emission Points AA-025 and AA-027 the permittee shall conduct performance tests and establish operating requirements according to 63.2262 of Subpart DDDD.
(Ref.: 40CFR §63.2262)
- 5.B.15 For Emission Points AA-025 and AA-0027, the permittee must develop a plan for minimizing fugitive emissions from the veneer dryer heated zones. The plan must be submitted with the Notification of Compliance Status.
(Ref: 40 CFR 63.2265)
- 5.B.16 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall demonstrate continuous compliance with the work practice standards outlined in Condition 3.D.1 and 40 CFR 63.2241(a) by following the facility's plan for minimizing emissions required by 40 CFR 63.2241(a).
(Ref: 40 CFR 63.2271(a))
- 5.B.17 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall keep a copy of the following records:
- (a) A copy of each notification and report submitted to comply with Subpart DDDD, including all documentation used to support the Initial Notification or the Initial Notification of Compliance Status.
 - (b) A copy of each record required in Table 8 of Subpart DDDD to document continuous compliance with each applicable work practice standard.
- (Ref. 63.2282(a) and (b))
- 5.B.18 A copy of these records must be kept for a period of five years. Each record must be kept on site for a period of 2 years from the date it was created or obtained. The records can be kept offsite for the remaining 3 years. All records must be kept in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1) and Condition 5.A.3.
(Ref: 63.2283(a) through (c))
- 5.B.19 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions found in 40 CFR 63.6(e)(3).
(Ref: 40 CFR 63.2250(c))

5.B.20 During periods of startup, shutdown, and malfunction, the permittee shall operate in accordance with the SSMP. The permittee shall notify MDEQ, by fax or telephone, within 2 working days, of any startup, shutdown, or malfunction during the reporting period which was inconsistent with the startup, shutdown, and malfunction plan (SSMP). The report should include the action taken during the event.

(Ref: 40 CFR 63.2271 (b)(1))

5.B.21 For Emission Points AA-025 and AA-027, the permittee shall monitor and document with recordkeeping the hours of operation of each dryer and RTO each day, the hours of operation of each dryer under the Routine Control Device Maintenance Exemption, and the 12-month rolling totals of each. The records for the previous (5) year period shall be maintained at the facility and made available to the Office of Pollution Control upon request.

(Ref.: 40 CFR 63.2251)

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
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Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-017 AA-025 AA-026 AA-027	Opacity	Semi-annual report	5.C.1	APC-S-1 Section 3.2
AA-005 AA-006	PM/Hours of operation	Semi-annual report	5.C.1	APC-S-6 Section III.A.3(2)
AA-004 AA-007 AA-017	VOC/Total Production	Semi-annual report	5.C.1	APC-S-6 Section III.A.3(2)
AA-025 AA-027	VOC	Semi-annual report	5.C.1	APC-S-6 Section III.A.3(2)
AA-004 AA-007 AA-025 AA-026 AA-027	Compliance	Notification of Compliance Status Report	5.C.2 5.C.4	§63.2260(c)
		Semiannual Report	5.C.7	§63.2281(a)
	Performance Testing	Notice of Intent	5.C.3	§63.2280(c)
	Deviation or Instance of Noncompliance	Event Operating Report	5.C.5	§63.2271(b)
	Startup, Shutdown or Malfunction	Report within seven (7) days of event	5.C.6	§63.2281(a)

- 5.C.1 The permittee shall submit a summary report of the required monitoring, in accordance with Section 5.A.4 of this permit. The summary report shall include:
- (a) A summary report of the opacity observations for Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-017, AA-025, AA-026, AA-027.
 - (b) A summary report of the hours of operation of AA-005 and AA-006 both on a daily and consecutive 365-day basis.
 - (c) A summary report of the combined production rates for AA-004 and AA-007, both on a daily and consecutive 365-day basis.
 - (d) A summary report of the total facility production rate for Emission Point AA-017, both on a daily and consecutive 365-day basis.
- (Ref: APC-S-6 Section III.A.3.c(1))
- 5.C.2 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall submit the Notification of Compliance Status by the 60th day following the completion of the relevant compliance demonstration activity as specified in §63.9(h)(2)(ii) of Subpart A and it shall contain the results of the initial compliance demonstration according to the requirements in §63.2280(d).
(Ref: 40 CFR 63.2260(c))
- 5.C.3 A written notification of intent to conduct a performance test must be submitted at least 60 calendar days before the performance test is scheduled to begin as specified in §63.7(b)(1) of Subpart A.
(Ref: 40 CFR 63.2280(c))
- 5.C.4 The compliance report must contain the information in paragraphs §63.2281(c)(1) through (8) that specifically applies to the facility.
(Ref: 40 CFR 63.2281(c))
- 5.C.5 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall report each deviation (or instance of noncompliance) with the work practice standard identified in Condition 3.D.1 according to the requirements in §63.2281 of Subpart DDDD.
(Ref: 40 CFR 63.2271(b))
- 5.C.6 For Emission Points AA-004, AA-007, AA-025, AA-026, and AA-0027, the permittee shall submit to MDEQ, within 7 working days after the end of the event, a written report of any startup, shutdown, or malfunction that occurs during the reporting period, and was inconsistent with the SSMP. The written report should contain the requirements listed in 40 CFR 63.10(d)(5)(ii).

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

- 5.C.7 The permittee must submit a compliance report semiannually according to the requirements in §63.2281(b) of 40 CFR Part 63, Subpart DDDD and Condition 5.A.4 of this permit.
(Ref: 40 CFR 63.2281(a))

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

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. The full text of the referenced regulations is contained in Appendix B to this permit.

- 7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- (a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to § 82.106.
 - (b) The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - (c) The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - (d) No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - (b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - (d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to § 82.166. ("MVAC - like appliance" is defined at § 82.152.)
 - (e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - (f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

- 7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 μ m 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

40 CFR 82

PROTECTION OF STRATOSPHERIC OZONE

APPENDIX C

40 CFR 63, SUBPART DDDD

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS:
PLYWOOD AND COMPOSITE WOOD PRODUCTS**