

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Norbord Mississippi, Inc.,
a division of Norbord Industries, Inc.
1194 Highway 145 North
Guntown, Mississippi
Lee 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: June 3, 2010

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Modified: January 13, 2012 and DEC 21 2012
Expires: May 31, 2015

Permit No.: 1540-00058

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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.: 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 that 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, AAir 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	Wafer drying system consisting of three (3) wood-fired burners/oxidizers (each with a heat input of 88.84 MMBTU/hr for a total of 266.52 MMBTU/hr), thermal oil heater, and an indirect-fired thermal oil-heated conveyor dryer with multiclones, cyclones, and an electrostatic precipitator for PM emissions control.
AA-002	Board press vent equipped with a biofilter for control of VOCs.
AA-003	Side trim and flying cut off saw equipped with a cyclone which then exhausts to a Baghouse (Facility Reference No. By) for PM emissions control.
AA-004	Blending and mat forming equipped with a Baghouse (Facility Reference No. Bx) for PM emissions control.
AA-005	Sawline equipped with a cyclone which then exhausts to a Baghouse (Facility Reference No. C) for PM emissions control.
AA-006	Sander equipped with a Baghouse (Facility Reference No. D) for PM emissions control.
AA-007	High pressure relay system equipped with 2 Cyclones (Facility Reference Nos. A and F) which then exhausts to a Baghouse (A) for PM emissions control.
AA-008	Log debarking process.
AA-009	Fugitive emissions from on-site vehicle traffic.
AA-014	Waferizer and dryer area equipped with a Baghouse (Facility Reference No. B) for PM emissions control.

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	
Entire Facility	NESHAP, Subpart DDDD 40 CFR 63.2231	3.B.1	HAP	The permittee is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of 40 CFR Part 63 Subpart DDDD - National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products	
	NSPS, Subpart Dc 40 CFR 60.40c and applicable parts of 40 CFR 60 Subpart A, General Provisions	3.B.2	PM, Opacity	The permittee is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	
	Title V Operating Permit issued herein (issuance date)	3.B.12	HAP (single) HAPs (combined)	9.9 tons/yr 24.9 tons/yr	
AA-001	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	27 lb/ hr and 117 tons/yr	
			NO _x	0.25 lbs/ MMBTU, not to exceed 66.8 lbs/hr and 292.4 tons/yr	
			VOC	0.16 lbs/MMBTU, not to exceed 43.1 lbs/hr and 188.4 tons/yr	
	NSPS, Subpart Dc 40 CFR 60.43c	3.B.4	and 3.B.3	PM/PM ₁₀	0.10 lbs/ MMBTU
	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.				
	APC-S-1, Section 3.4	3.B.5		PM/PM ₁₀	0.3 grains/dry standard cubic foot
	40 CFR 60.43c(c)	3.B.6		Opacity	20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.
APC-S-1, Section 4.1(a)	3.B.7		SO ₂	4.8 lbs/MMBTU	
AA-002	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December	3.B.3	PM/PM ₁₀	8.3 lb/hr and 36.2 TPY.	

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
	6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and blah .		VOC	41.91 lb/hr and 183.57 TPY.
AA-003	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	4.6 lb/hr and 19.9 TPY.
			VOC	3.9 lb/hr and 16.9 TPY.
AA-004	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	2.2 lb/hr and 9.7 TPY.
			VOC	3.3 lb/hr and 14.5 TPY.
AA-005	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	2.2 lb/hr and 9.7 TPY.
			VOC	1.6 lb/hr and 6.7 TPY.
AA-006	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	1.8 lb/hr and 7.9 TPY.
			VOC	1.4 lb/hr and 6.0 TPY.
AA-007	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, and February 20, 2008.	3.B.3	PM/PM ₁₀	4.6 lb/hr and 19.9 TPY.
			VOC	4.8 lb/hr and 21.1 TPY.
AA-014	Federally Enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and blah .	3.B.3	PM/PM ₁₀	4.6 lb/hr and 19.9 TPY.
			VOC	13.09 lb/hr and 56.94 TPY.
AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-014	APC-S-1, Section 3.6(a)	3.B.8	PM	$E=4.1*(p)^{0.67}$, or as otherwise limited herein.

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001	NESHAP, Subpart DDDD 40 CFR 63.2240(b)	3.B.9	HAP	Capture/ destruction of zone 1 dryer exhausts.
AA-002	NESHAP, Subpart DDDD 40 CFR 63.2240(b) and Table 1B of Subpart DDDD	3.B.10	HAP	Reduce formaldehyde by 90%.
AA-001 AA-002	NESHAP, Subpart DDDD 40 CFR 63.2250(a)-(c)	3.B.11	HAP	General Operating Requirements

- 3.B.1 For the entire facility, the permittee is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of 40 CFR Part 63 Subpart DDDD - National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products and with associated applicable provisions of 40 CFR Part 63 Subpart A – General Provisions, which are specified in 63.2290. A copy of the Subpart DDDD is provided as supplemental information in Appendix B. (Ref.: 40 CFR Part 63.2231 and 63.2290)
- 3.B.2 For the entire facility, the permittee is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units and with the associated applicable provisions of 40 CFR Part 60 Subpart A – General Provisions. A copy of Subpart Dc is provided as supplemental information in Appendix C. (Ref.: 40 CFR 60.40c)
- 3.B.3 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007 and AA-014, the permittee is limited by the federally enforceable Permit to Construct issued on October 21, 1993, and modified on December 6, 1994, May 23, 1995, November 18, 1997, May 29, 2001, June 3, 2003, February 20, 2008, and **blah**.
- 3.B.4 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere any gases that contain PM in the excess of 0.10 lb/MMBTU (43 ng/J) heat input. (Ref.: 40 CFR 60.43c(b))
- 3.B.5 For Emission Point AA-001, the permittee shall be allowed emission rates up to 0.30 grains/dry standard cubic foot. (Ref.: APC-S-1, Section 3.4(b))
- 3.B.6 For Emission Point AA-001, the permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20% opacity (6-minute average),

except for one 6-minute period per hour of not more than 27% opacity. The opacity standards under this section apply at all times except during periods of startup, shutdown or malfunction. (Ref.: 40 CFR 60.43c (c) and (d))

- 3.B.7 For Emission Point AA-001, the maximum discharge of sulfur oxides (SO₂) from any fuel burning installation in which the fuel is burned 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.8 For Emission Points AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, and AA-014 the permittee shall not cause, permit, or allow the emission, in any one hour, of 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 or as otherwise specified herein. 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.9 For Emission Point AA-001, the permittee shall meet the applicable compliance option from Table 1B of Subpart DDDD by continuing to capture the exhaust gases from Zone 1 of the conveyor dryers and routing them directly into the flame zones of the combustion units. (Ref.: 40 CFR 63.2240(b) and Table 1B of Subpart DDDD)
- 3.B.10 For Emission Point AA-002, the permittee shall reduce formaldehyde emissions from the press by capturing all emissions from the press and routing them to a biofilter. The formaldehyde concentration of the gas entering the biofilter must be reduced by at least 90%. (Ref.: 40 CFR 63.2240(b) and Table 1B of Subpart DDDD)
- 3.B.11 For Emission Points AA-001 and AA-002, the permittee shall meet the following general requirements:
- (a) The permittee must be in compliance with the compliance options, operating requirements, and work practice requirements of 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 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 must always operate and maintain their affected sources, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i).
- (c) The permittee must 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(a)-(c))

3.B.12 The facility shall limit the emission of all HAPs to less than 9.9 tons/year of any single HAP and 24.9 tons/year of combined HAPs. (Ref.: Title V Permit to Operate-limits issued herein)

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 lb/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 lb/MMBTU or as otherwise limited by facility modification restrictions
NSPS Subpart K _b 40 CFR 60.110(b)	3.C.3	VOC	Recordkeeping
APC-S-1, Section 3.6(a)	3.C.4	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.

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.

- 3.C.3 The permittee shall comply with the New Source Performance Standards for Volatile Organic Liquid Storage Vessels constructed, reconstructed, or modified after July 23, 1984. (Ref.: 40 CFR 60.110(b), Subpart K_b)
- 3.C.4 Except as otherwise specified, the permittee shall not 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 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.

D. Work Practice Standards

- 3.D.1 The permittee shall meet the work practice requirement for all Group 1 miscellaneous coating operations by using only non-HAP coatings. Such coatings are used in the following types of applications: edge seal, nail lines, logo paint, shelving edge fillers, trademark/gradestamp inks, and wood putty patches to composite wood products. (Ref.: 40 CFR 63.2241(a) and Table 3 of Subpart DDDD)
- 3.D.2 The permittee shall meet the work practice standard, emission reduction measure and management practices specified in Table 2 of MACT Subpart JJJJJ. (Ref.: 40 CFR 63.11201(b))

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)
- 4.3 Emission Point AA-001 is subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart JJJJJ by March 21, 2012. (Ref.: 40 CFR 63.11196)

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	PM/PM ₁₀ , NO _x , VOC	Stack Test Biennially	5.B.1	APC-S-6, Section III.A.3
	Opacity	Monitor and Record the Opacity using a Continuous Opacity Monitoring System (COMS)	5.B.2	40 CFR 60.47c(a) and (b)
	Fuel Usage	Fuel Monitoring	5.B.3	40 CFR 60.48c(g)
	Records	Keep required records for a minimum of 5 years	5.B.4	40 CFR 60.48c(i)
AA-002	PM/PM ₁₀ , VOC	Stack Test Biennially	5.B.5	APC-S-6, Section III.A.3
AA-003, AA-004, AA-005, AA-006, AA-007, AA-014	PM/ PM ₁₀	Stack Test once within the life of the permit	5.B.6	APC-S-6, Section III.A.3
	VOC	Stack Test Biennially	5.B.7	APC-S-6, Section III.A.3
AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-014	Control Equipment	Conduct weekly inspections and record any repair or maintenance done	5.B.8	APC-S-6, Section III.A.3
	CAM	Compliance Assurance Monitoring (CAM) is conducted for each control device as specified	5.B.10, 5.B.11, 5.B.12, 5.B.13	40 CFR 64.7 through 64.9
AA-002, AA-003, AA-004, AA-005, AA-006,	Opacity	Conduct weekly (or more often if needed) inspection for Visible Emissions. If any are observed, an EPA reference method 9 test is to be performed	5.B.9	APC-S-6, Section III.A.3

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-007, AA-014				
AA-001	HAPs	Monitoring/ Operating Requirement	5.B.14	40 CFR 63.2260(a)
		MACT Subpart JJJJJ Initial Compliance	5.B.24	40 CFR 63.11196(a)(3)
		MACT Subpart JJJJJ Work Practice Standards	5.B.25	40 CFR 63.11214(b)
		MACT Subpart JJJJJ Biennial Performance Tune-ups	5.B.26	40 CFR 63.11223
		MACT Subpart JJJJJ Biennial Performance Tune-ups	5.B.27	40 CFR 11223
AA-002	HAPs	Performance Testing	5.B.15	40 CFR 63.2262(a), Table 4, and 63.2271(a), Table 7
		Install, Operate, and Maintain Continuous Parameter Monitoring System	5.B.16	40 CFR 63.2269(a)
		Temperature Monitoring Device Requirements	5.B.17	40 CFR 63.2269(b)
		Monitor and collect data to demonstrate continuous compliance	5.B.18	40 CFR 63.2271(a), Table 7 and 63.2282(b)
		Biofilter Bed Temperature Monitoring	5.B.19	40 CFR 63.2271(a), Table 8 and 63.2282(b)
Entire Facility	HAPs	Group 1 Miscellaneous Coating Operations Recordkeeping Requirement	5.B.20	40 CFR 63.2271(a), Table 8 and 63.2282(b)
		Recordkeeping requirements	5.B.21	40 CFR 63.2282(a)
		Monitor and maintain records for resin usage	5.B.22 5.B.23	APC-S-6, Section III.A.3.a(2)

5.B.1 For Emission Point AA-001, the permittee shall demonstrate compliance with the particulate matter, nitrogen oxide, and volatile organic compound emission limitations

by stack testing biennially (every two years) in accordance with EPA Reference Methods 1-5, 7, and 25 or 25A, respectively, and by submittal of a stack test report by December 1, 2012, and biennially thereafter. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. (Ref.: APC-S-6, Section III.A.3)

- 5.B.2 For Emission Point AA-001, the permittee shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system. The COMS shall be operated in accordance with the applicable procedures under Performance Specification 1 of 40 CFR Part 60 Appendix B. The span value of the opacity COMS shall be between 60 and 80 percent. (Ref.: 40 CFR 60.47c(a) and (b))
- 5.B.3 For Emission Point AA-001, the permittee shall record and maintain records of the amounts of each fuel combusted during each operating day. (Ref.: 40 CFR 60.48c(g))
- 5.B.4 All records required under this section shall be maintained by the owner or operator of the affected facility for a period of five (5) years following the date of such record. (Ref.: 40 CFR 60.48c(i))
- 5.B.5 For Emission Point AA-002, the permittee shall demonstrate compliance with the volatile organic compound emission limitation by stack testing biennially (every two years) in accordance with EPA Reference Method 25 or 25A, and submittal of a stack test report beginning December 1, 2012, and biennially thereafter. The permittee shall also demonstrate compliance with the particulate matter emission limitation by stack testing in accordance with EPA Reference Methods 1-5, and submittal of a stack test report no later than December 1, 2012. During compliance demonstration, the permittee shall operate at or near the maximum press loading rate, maximum safe press temperature, and shall use resins with the highest VOC content expected. Once compliance has been demonstrated for AA-002, the permittee shall not exceed the operating levels, for the parameters listed above, that Emission Point AA-002 was tested at. If increases in VOC resin content are needed, the permittee shall demonstrate compliance using the higher VOC content resin within 30 days of beginning its use. (Ref.: APC-S-6, Section III.A.3)
- 5.B.6 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with the Particulate Matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5 and submittal of a stack test report once within the 5 year term of this permit, no later than December 1, 2014. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. For Emission Point AA-014, this stack testing shall only be required after construction and upon commencement of operation of the control device. (Ref.: APC-S-6, Section III.A.3)

- 5.B.7 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with the VOC emission limitations by stack testing biennially (every two years) in accordance with EPA Reference Methods 25 or 25A, and submittal of a stack test report beginning December 1, 2012, and biennially thereafter. During testing, the source shall be operated as close to its maximum capacity as operating conditions allow. For Emission Point AA-014, this stack testing shall only be required after construction and upon commencement of operation of the control device. (Ref.: APC-S-6, Section III.A.3)
- 5.B.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall perform regular inspections and any required maintenance each week or more often if necessary to maintain proper operation of the pollution control equipment. Records of this maintenance shall be kept in log form and made available for review upon request, and a summary report shall be submitted in accordance with Permit Condition 5.A.4. In addition, the permittee shall also maintain on hand at all times sufficient equipment as is necessary to repair and/or replace the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored, except when approved by the Mississippi Environmental Quality Permit Board. For Emission Point AA-014, these inspections shall only be required after construction and upon commencement of operation of the control device. (Ref.: APC-S-6, Section III.A.3)
- 5.B.9 For all emission points except Emission Point AA-001, the facility must conduct weekly inspections for visible emissions. If any visible emissions are detected (one-minute interval) in excess of the applicable opacity standard, with the exception of steam plumes, conduct a minimum of one six-minute observation in accordance with EPA Reference Method 9. Upon observation of visible emissions in excess of the applicable opacity standard, from an emission point, the frequency of observation for that emission point shall become daily until no visible emissions in excess of the applicable opacity standard are observed for seven consecutive days. After seven consecutive days of no visible emission observations, the inspection frequency may be reduced to weekly. If no visible emissions are observed after three consecutive months of weekly observations, the frequency may be reduced to monthly. However, if emissions are observed during a monthly inspection, the frequency of inspection shall revert to the daily schedule as specified above. The permittee shall maintain records of all applicable opacity inspections and any VEE's that are performed in accordance with Condition 5.A.3 of this document. (Ref.: APC-S-6, Section III.A.3)
- 5.B.10 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall comply with the compliance assurance monitoring (CAM) requirements set forth in 40 CFR Part 64, found in Appendix E of this permit. Specifically, the permittee shall conduct required monitoring and recordkeeping in accordance with 64.7 through 64.9.

5.B.11 For Emission Points AA-001, the permittee shall conduct compliance assurance monitoring for PM in accordance with the CAM plan found in appendix D of this permit and the following monitoring approach. For each excursion, the permittee shall document the event and the corrective actions taken.

	Indicator No. 1	Indicator No. 2
I. Indicator	Opacity	Total Power
Measurement Approach	The opacity is monitored by a CEMS.	The voltage and current are measured by a SQ3000 Controller.
II. Indicator Range	An excursion is defined as the presence of emissions above 15% lasting for more than 1 hour.	An excursion is defined as Total power that is less than 30,000 kW according to historical data or as defined by the next compliance testing.
III. Performance Criteria		
A. Data Representativeness	The opacity measurements are to be made at the emission point (ESP) exhaust.	The SQ3000 Controller is located at each rectifier.
B. Verification of Operational Status	N/A	N/A
C. QA/QC Practices/Criteria	The equipment is maintained, and operated to suggested manufacturer's recommendations, as necessary.	The equipment is calibrated, maintained, and operated to suggested manufacturer's recommendations, as necessary.
D. Monitoring Frequency	The CEMS monitors the opacity continuously.	The total power is monitored continuously.
E. Data Collection Procedures	The CEMS records every 6-minute average on a circular chart.	The total power is recorded as a 6- minute average.
F. Averaging period	6- Minute Average	6-Minute Average

5.B.12 For Emission Points AA-002, the permittee shall conduct compliance assurance monitoring for VOCs in accordance with the CAM plan found in appendix D of this permit and the following monitoring approach. For each excursion, the permittee shall document the event and the corrective actions taken.

	Indicator No. 1	Indicator No. 2
I. Indicator	Temperature	Biofilter Equipment Inspection
Measurement Approach	The temperature is monitored at each bed.	The biofilter and all associated equipment are inspected for malfunction and integrity.
II. Indicator Range	An excursion is defined as a biomass bed temperature of less than 70 degrees F under normal operating conditions.	An excursion is defined as any catastrophic equipment malfunctions.
III. Performance Criteria		
A. Data Representativeness	Measurements are being made at each biomass bed.	The inspections are being made at the biofilter and the associated equipment.

	Indicator No. 1	Indicator No. 2
B. Verification of Operational Status	N/A	N/A
C. QA/QC Practices/Criteria	The equipment is maintained and operated to suggested manufacturer's recommendation as necessary.	N/A.
D. Monitoring Frequency	The temperature is measured continuously.	The equipment is inspected weekly.
E. Data Collection Procedures	The temperature measurements are collected every 15 minutes	The inspections are manually recorded weekly.
F. Averaging period	24-hour block average	N/A

5.B.13 For Emission Points AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014 the permittee shall conduct compliance assurance monitoring for PM in accordance with the CAM plan found in appendix D of this permit and the following monitoring approach. For each excursion, the permittee shall document the event and the corrective actions taken. For Emission Point AA-014, this CAM plan shall only apply upon commencement of operation of the control device.

	Indicator No. 1	Indicator No. 2
I. Indicator	Pressure Drop	Visible Emissions
Measurement Approach	Pressure drop across the baghouse is measured with a differential pressure gauge.	Visible emissions from the baghouse exhaust will be monitored weekly using EPA Method 22-like observation. When emissions are observed, a full Method 9 will be performed.
II. Indicator Range	An excursion is defined as a pressure drop greater than 7 inches H ₂ O for AA-003, and a pressure drop greater than 5 inches H ₂ O for all others.	An excursion is defined as the presence of visible emissions.
III. Performance Criteria		
A. Data Representativeness	Pressure taps are located at the baghouse inlet and outlet.	Measurements are made at the baghouse exhaust.
B. Verification of Operational Status	N/A	N/A
C. QA/QC Practices/Criteria	The equipment is calibrated, maintained, and operated to suggested manufacturer's recommendations, as necessary.	The Method 22-like observation will be performed by a person trained on-site. A certified Visible Emission Reader will be certified by the MDEQ or equivalent agency qualified for such services.
D. Monitoring Frequency	Pressure drop is monitored continuously.	A Method 22-like observation is performed weekly, followed by a method 9 if warranted.
E. Data Collection Procedures	Pressure drop is manually recorded once per 24-hour period.	The observer documents the VE observations manually.
F. Averaging period	N/A	N/A

- 5.B.14 For Emission Point AA-001, the permittee shall continue to monitor and maintain documentation verifying that all zone 1 dryer emissions are being introduced into the flame zones of the combustion units. In doing so, the permittee is exempted from all initial testing and operating requirements for thermal oxidizers. (Ref.: 40 CFR 63.2260(a))
- 5.B.15 For Emission Point AA-002, the permittee shall conduct all performance tests in accordance with the requirements outlined in §63.2262 (b-e), (h) and (m) and using the methods specified in Table 4.

The permittee shall conduct subsequent performance tests in accordance with the following criteria:

- (a) within two (2) years following the previous tests; or,
- (b) within 180 days after each replacement of any portion of the biofilter bed media with a different type of media; or,
- (c) within 180 days after each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media.

(Ref.: 40 CFR 63.2262(a), Table 4 of Subpart DDDD, 40 CFR 63.2271(a) and Table 7 of Subpart DDDD)

- 5.B.16 For Emission Point AA-002, the permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a) through (c) below:
- (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) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - (c) The permittee shall record the results of each inspection, calibration, and validation check.

(Ref.: 40 CFR 63.2269(a))

5.B.17 For Emission Point AA-002, for each temperature monitoring device, shall meet the requirements in 5.B.16 above and (a) through (f) below:

- (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 a chart recorder is used, it must have a sensitivity with 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 the 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.
- (f) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(Ref.: 40 CFR 63.2269(b))

5.B.18 For Emission Point AA-002, the permittee shall monitor and collect data to demonstrate continuous compliance according to paragraphs (b), (c), (e) and (f) of 40 CFR 63.2270. (Ref.: 40 CFR 63.2270(a))

5.B.19 For Emission Point AA-002, the permittee shall demonstrate continuous compliance by collection and recording the biofilter bed temperature in accordance with Conditions 5.B.16 through 5.B.18, reducing the data to a 24-hour block average, and maintaining the biofilter bed temperature within the range established via the performance test(s) conducted in accordance with Condition 5.B.15. (Ref.: 40 CFR 63.2271(a), Table 7 of Subpart DDDD and 40 CFR 63.2282(b)).

5.B.20 For all Group 1 miscellaneous coating operations subject to the requirements outlined in Condition 3.D.1 of this permit, the permittee shall demonstrate continuous compliance by continuing to use non-HAP coatings and by keeping records showing

that all coatings being used are non-HAP containing coatings. (Ref.: 40 CFR 63.2271(a), Table 8 of Subpart DDDD, and 40 CFR 63.2282(d))

5.B.21 The permittee must keep the following records:

- (a) A copy of each notification and report that is submitted to comply with Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements of 63.10(b)(2)(xiv).
- (b) The records in 63.6(e)(3)(iii) through (v) related to startup, shutdown and malfunction.
- (c) Documentation of any approved routine control device maintenance exemption, if such an exemption was requested under 63.2251.
- (d) Records of performance tests and performance evaluations as required in 63.10(b)(2)(viii).
(Ref.: 40 CFR 63.2282(a))

5.B.22 For the entire facility, the permittee shall determine for each resin, or other HAP containing material used:

- (a) Quantity used (gallons or pounds)
- (b) The percentage of each Hazardous Air Pollutant (HAP) by weight
- (c) The density (lbs/gal), unless material usages are measured in pounds

The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by 40 CFR 60, EPA Test Method 18, Appendix A, 40 CFR 60, EPA Test Method 24, Appendix A, or 40 CFR 63, EPA Test Method 311, Appendix A. (Ref.: APC-S-6, Section III.A.3.a(2))

5.B.23 For the entire facility, the permittee shall keep readily accessible records documenting:

- (a) Any changes, including but not limited to, production capacity, method of operation, and the removal, replacement, or addition of a control device.
- (b) The identification of and the total quantity used of each resin, gel coat, release agent, coating solvent, adhesive, or HAP containing material used on a monthly basis and in any consecutive 12-month period.
- (c) The density or weight percent of HAPs, of each resin, or other HAP containing material used, unless material uses are measured in pounds.

The permittee shall maintain copies of all records and reports on site for at least five (5) years and shall make them available upon request by Mississippi Department of Environmental Quality (MDEQ) personnel. (Ref.: APC-S-6, Section III.A.3.a(2))

- 5.B.24 For Emission Point AA-001, the permittee shall demonstrate initial compliance with MACT Subpart JJJJJ no later than the compliance March 21, 2014 according to the applicable provisions specified in 40 CFR 63.7(a)(2). (Ref.: 40 CFR 63.11196(a)(3))
- 5.B.25 For Emission Point AA-001, the permittee shall demonstrate compliance with work practice standards, emission reduction measures and management practices through completion of performance tune-up in accordance with 63.11223(b) and the permittee shall submit a signed certification in the Notification of Compliance Status Report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report. (Ref.: 40 CFR 63.11214(b) and (c))
- 5.B.26 For Emission Point AA-001, the permittee shall complete a biennial performance tune-up and maintain the records to demonstrate the continuous compliance in accordance with §63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. (Ref.: 40 CFR 63.11223)
- 5.B.27 For Emission Point AA-001, the permittee shall conduct the biennial performance tune-up as specified below:
- (a) Inspect the burner, and clean or replace any components of the burner as necessary. The burner inspection may be delayed until scheduled unit shutdown, but must be inspected at least once every thirty-six (36) months.
 - (b) Inspect the flame pattern and adjust the burner to optimize the flame pattern. Adjustments should be consistent with the manufacturer's specifications, if available.
 - (c) Inspect the system controlling the air-to-fuel ratio, to ensure that it is correctly calibrated and functioning properly.
 - (d) Optimize total emission of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
 - (e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

- (f) Maintain onsite and submit, if request by the Department, biennial report containing the following information:
- (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
 - (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (3) The type and amount of fuel used over the 12 months prior to the biennial tune-up.
- (g) In the event the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.
(Ref.: 40 CFR 63.11223)

C. Specific Reporting Requirements

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-014	PM/PM ₁₀ , NO _x , VOC,	Pretest notifications and stack test report requirements	5.C.1	APC-S-6, Section III.A.3
AA-001	Excess Emissions	Quarterly excess emissions reporting requirements	5.C.2	APC-S-6, Section III.A.3
	HAPs	Notification Reporting and Recordkeeping	5.C.9 5.C.10	40 CFR 63.11225(a), (b), and (c)
		Notification of Compliance Status	5.C.11	40 CFR 63.11214(c)
Entire Facility	HAPs	General Provisions Notification requirements	5.C.3	40 CFR 63.2280(a)
		Performance Test Notification	5.C.4	40 CFR 63.2280(c)
		Notification of Compliance Status	5.C.5	40 CFR 63.2280(d)
		Miscellaneous notification requirements	5.C.6	40 CFR 63.2280(g)

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
		Semi-Annual Compliance Report	5.C.7	40 CFR 63.2281(b) and (c)
		Deviation Reports	5.C.8	40 CFR 63.2271(b) and 63.2281(d), (e), and (g)

5.C.1 For Emission Point AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, and AA-014, the permittee shall submit the following notifications, information, and reports for each required performance test on or before the dates specified in Section 5.B:

- (a) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so an observer may be afforded the opportunity to witness the test(s).
- (b) For all required testing, 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 MDEQ. If the test protocol contains variances from the EPA Reference Methods, the permittee shall submit a written test protocol at least ninety (90) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ.

After the first successful submittal of a written test protocol, the permittee may request that the submittal of a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

- (c) The permittee shall submit the results of all required emissions testing in the units specified by the limitations set forth in Section 3.B. Note, for VOC emissions testing conducted in accordance with EPA Reference Methods 25 or 25A, the permittee shall report the results on an “as carbon” basis.
- (d) The permittee shall submit a summary of the results of any periodic and/or parametric monitoring required to be monitored and recorded by Conditions 5.B.15 during performance testing.

The performance test results must be submitted to MDEQ within sixty (60) days following completion of the performance test. (Ref.: APC-S-6, Section III.A.3)

5.C.2 The permittee shall submit excess emission reports for any calendar quarter for which there are excess emissions from the affected facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting periods ending June 30 and December 31. The initial quarterly report shall be postmarked by the 30th day of the third month following the completion of the initial performance test, unless no excess emissions occur during that quarter. The initial semiannual report shall be postmarked by the 30th day of the sixth month following the completion of the initial performance test, or following the date of the previous quarterly report, as applicable. Each subsequent quarterly or semiannual report shall be postmarked by the 30th day following the end of the reporting period. (Ref.: 40 CFR 60.48c(c))

5.C.2 The permittee must submit all of the notifications in 63.7(b) and (c), 63.8(e),(f)(4) and (f)(6), 63.9(b) through (e) and (g) and (h) by the dates specified in those provisions. (Ref.: 40 CFR 63.2280(a))

5.C.3 The permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 63.7(b)(1). (Ref.: 40 CFR 63.2280(c))

5.C.4 Upon completion of a performance test required in 5.B.15, the permittee must submit a Notification of Compliance Status as specified in 63.9(h)(2)(ii). (Ref.: 40 CFR 63.2280(d))

5.C.5 The permittee must notify MDEQ within 30 days before taking any of the following actions:

- (a) Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements in Subpart DDDD
- (b) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

(Ref. 40 CFR 63.2280(g))

5.C.6 The permittee must submit each semi-annual compliance report in accordance with Condition 5.A.4 of this permit. At a minimum the report should contain the following information:

- (a) Company name and address
- (b) Statement by the responsible official with that official's name, title, and signature certifying the truth, accuracy, and completeness of the content of the report.
- (c) Date of the report and beginning and ending dates of the reporting period.
- (d) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your SSMP, the compliance report must include the information specified in §63.10(d)(5)(i).
- (e) A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in (1) and (2) below.
 - (1) The date and time when the control device was shut down and restarted.
 - (2) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
- (f) The results of any performance tests conducted during the semiannual reporting period.
- (g) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 of Subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
- (h) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in 63.8(c)(7), a statement that there were no periods which the CMS was out-of-control during the reporting period.

(Ref.: 40 CFR 63.2281(b) and (c))

- 5.C.7 The permittee must report all deviations as defined in Subpart DDDD in the semiannual monitoring report required in condition 5.A.4. If the permittee submits a compliance report pursuant to Table 9 of Subpart DDDD along with, or as part of, the semiannual monitoring report, and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. Deviation reports must contain the information specified in §63.2281(d) or (e), whichever is applicable. (Ref.: 40 CFR 63.2271(b) and 40 CFR 63.2281(d), (e), and (g))
- 5.C.8 The permittee shall submit semiannual reports providing:
- (a) Any changes, including but not limited to, production capacity, method of operation, and the removal, replacement, or addition of a control device.
 - (b) Identification of each resin, or any other HAP containing material used
 - (c) The HAP content(s) of each resin, or other HAP containing material used.
 - (d) The total quantity used of each resin, or other HAP containing material used in any consecutive 12-month period.
 - (e) The emission rate of each individual HAP and the total HAP emission rate in tons/year for each consecutive period.
 - (f) The reports shall be submitted according to Condition 5.A.4. 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)
- 5.C.9 For Emission Point AA-001, The permittee shall comply with the notification, reporting and recordkeeping requirements described:
- (a) The permittee shall submit all notifications described in §§63.7(b):63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) which apply by the dates specified in those sections.
 - (b) As specified in §63.9(b)(2), the permittee shall submit the Initial Notification no later than 120 calendar days after the May 20, 2011 or within 120 days after the source becomes subject to the standard.

- (c) The permittee shall submit the Notification of Compliance Status in accordance with §63.9(h) no later than 120 days after the applicable compliance date specified in §63.11196.
- (d) The permittee shall provide a statement confirming “This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.”
- (e) The permittee shall provide a statement confirming “ This facility has had an energy assessment performed according to §63.11214(c).”
- (f) The permittee shall prepare a biennial compliance report containing the information specified below.
 - (i) Company name and address.
 - (ii) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the subpart.
 - (iii) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
 - (iv) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

(Ref.: 40 CFR 63.11225)

5.C.10 For Emission Point AA-001, the permittee shall maintain the records specified below:

- (a) As required in §63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

- (b) The permittee must keep records to document conformance with the work §63.11214 as specified in paragraphs (c)(2)(i) and (ii) of this section.
 - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - (ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.
- (c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.11225)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

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
NMVOG	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 Φ 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 Part 60 Subpart Dc

**STANDARDS OF PERFORMANCE FOR SMALL INDUSTRIAL-COMMERCIAL-
INSTITUTIONAL STEAM GENERATING UNITS**

APPENDIX C

CAM PLANS

APPENDIX D

40 CFR Part 63 Subpart JJJJJ

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AREA SOURCE**