

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Masonite Corporation  
1001 South 4th Avenue  
Laurel, Mississippi  
Jones 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: December 1, 2020**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Krystal Rudolph*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: November 30, 2025**

**Permit No.: 1360-00028**

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## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

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

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters,

such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are

provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

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

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

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

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit

contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such

other time frame as provided in other regulations for emergencies) and the notification includes:

- (1) a brief description of the change(s),
  - (2) the date on which the change will occur,
  - (3) any change in emissions, and
  - (4) any permit term or condition that is no longer applicable as a result of the change;
- (d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;



- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 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 Part 51, Subpart I, or 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

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

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

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

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

taken to mitigate emissions, and corrective actions taken.

- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
    - (i) An upset occurred and that the source can identify the cause(s) of the upset;
    - (ii) The source was at the time being properly operated;
    - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
    - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
    - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
  - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
  - (3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

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

**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

Emission Point	Description	
Primary Line 1		
AB-101	Dryers for Primary Line 1 (AB-001 and AB-002)	
	AB-001	1 <sup>st</sup> stage dryer equipped with a cyclone with exhaust routed to the bioscrubber (BS-001)
	AB-002	2 <sup>nd</sup> stage dryer equipped with a cyclone with exhaust routed to AB-001 inlet
AB-102	Dust collection systems for Primary Lines 1 and 2	
	AB-003	Primary Line 1 Main Vacuum System with baghouse
	AB-004	Primary Line 1 Scalper and Mat Trim with baghouse
	AB-005	Common reject baghouse for Primary Lines 1 and 2
	AB-008	Rough Trim and Edge Saw baghouse for Primary Lines 1 and 2
	AB-010	Vacuum System baghouse for Primary Lines 1 and 2
	AC-003	Primary Line 2 Main Vacuum System with baghouse
AC-004	Primary Line 2 Scalper and Mat Trim with baghouse	
AB-007	Press with exhaust routed to the bioscrubber (BS-001) for control	
Primary Line 2		
AC-101	Dryers for Primary Line 2 (AC-001 and AC-002)	
	AC-001	1 <sup>st</sup> stage dryer equipped with a cyclone with exhaust routed to the bioscrubber (BS-001)
	AC-002	2 <sup>nd</sup> stage dryer equipped with a cyclone with exhaust routed to AB-001 inlet
AC-007	Press with exhaust routed to the bioscrubber (BS-001) for control	
Primary Line 3		
AI-101	Dryers for Primary Line 3 (AI-001 and AI-002)	
	AI-001	1 <sup>st</sup> stage dryer equipped with a cyclone with exhaust routed to the bioscrubber (BS-001)
	AI-002	2 <sup>nd</sup> stage dryer equipped with a cyclone with exhaust routed to AB-001 inlet
AI-102	Dust collection systems for Primary Line 3	
	AI-003	Main Vacuum System with baghouse
	AI-004	Scalper and Mat Trim with baghouse

Emission Point	Description	
AI-102	AI-006	Trim and Edge saw with baghouse
	AI-011	Housekeeping line cleanup baghouse
AI-005	Press with exhaust routed to bioscrubber (BS-001)	
Cut/Coat Line 1		
AD-101	Cut/Coat Line Preheat and IR Ovens	
	AD-001	4.6 MMBtu/hr natural gas-fired preheat oven
	AD-003	5.7 MMBtu/hr natural gas-fired IR Oven #1
	AD-005	5.7 MMBtu/hr natural gas-fired IR Oven #2
	AD-007	5.7 MMBtu/hr natural gas-fired IR Oven #3
	AD-008	6.325 MMBtu/hr natural gas-fired King Makeup Air Oven
AD-102	Cut/Coat Line HVHA Ovens	
	AD-002	4.5 MMBtu/hr natural gas-fired HVHA Oven #1
	AD-004	4.5 MMBtu/hr natural gas-fired HVHA Oven #2
	AD-006	4.5 MMBtu/hr natural gas-fired HVHA Oven #3
AD-103	Cut/Coat Line Spray Booths	
	AD-014	Spray booth No. 1 with cyclonic separator and dry filter
	AD-015	Spray booth No. 2 with cyclonic separator and dry filter
	AD-016	Spray booth No. 3 with cyclonic separator and dry filter
AD-104	Dust collection system	
	AD-011	Baghouse for the Cut/Coat Line saws
AJ-101	Cut/Coat Line Preheat and IR Ovens	
	AJ-001	4.6 MMBtu/hr natural gas-fired preheat oven
	AJ-004	5.7 MMBtu/hr natural gas-fired IR Oven #1
	AJ-007	5.7 MMBtu/hr natural gas-fired IR Oven #2
	AJ-010	8.1 MMBtu/hr natural gas-fired IR Oven

Emission Point	Description	
AJ-102	Cut/Coat Line HVHA Ovens	
	AJ-003	4.5 MMBtu/hr natural gas-fired HVHA Oven #1
	AJ-006	4.5 MMBtu/hr natural gas-fired HVHA Oven #2
	AJ-009	4.5 MMBtu/hr natural gas-fired HVHA Oven #3
AJ-103	Cut/Coat Line Spray Booths	
	AJ-002	Spray booth No. 1 with cyclonic separator and dry filter
	AJ-005	Spray booth No. 2 with cyclonic separator and dry filter
	AJ-008	Spray booth No. 3 with cyclonic separator and dry filter
AJ-011	First, second, and third pass trim saws equipped with a single baghouse	
AL-101	Exterior Press Lines	
	AL-008	Press Line 1 Plastic Composite Doorskin Manufacturing
	AL-009	Press Line 2 Plastic Composite Doorskin Manufacturing
	AL-010	Press Line 3 Plastic Composite Doorskin Manufacturing
	AL-011	Press Line 4 Plastic Composite Doorskin Manufacturing
	AL-012	Press Line 5 Plastic Composite Doorskin Manufacturing
	AL-013	Press Line 6 Plastic Composite Doorskin Manufacturing
	AL-014	Press Line 7 Plastic Composite Doorskin Manufacturing
	AL-015	Press Line 8 Plastic Composite Doorskin Manufacturing
AL-016	Press Line 9 Plastic Composite Doorskin Manufacturing	
AL-017	Press Line 10 Plastic Composite Doorskin Manufacturing	
Sheet Molding Compound (SMC)		
AN-001	Regenerative catalytic oxidizer for control of emissions from the manufacturing of SMC	
AN-002	SMC Maturation Room	
Bioscrubber and Heat Energy Plant (HEP)		
BS-001	Scheuch SABA Bioscrubber which controls emissions from AB-001, AB-002, AB-007, AC-001, AC-002, AC-007, AI-001, AI-002, and AI-005	

Emission Point	Description
BS-002	Heat Energy Plant fluidized bed combustion unit fired with wood/natural gas and equipped with a multiclone and electrostatic precipitator for control of PM
BS-003	Baghouse used to control emissions from the HEP dry fuel system cyclones
BS-004	Ash silo bin vent
AE-004	70" hog baghouse which controls emissions created from the grinding of cull doorskins
Emergency Engines	
EG-001	290 HP (216 kW/1.822 MMBtu/hr) emergency diesel-fired secondary fire pump (Mfd. Date 6/19/2006)
EG-002	115 HP (86 kW/0.29 MMBtu/hr) emergency diesel-fired fire water removal pump (Mfd. Date 3/28/2006)
EG-003	63 HP (27 kW/0.029 MMBtu/hr) emergency natural gas-fired backup generator for the catalyst building (Model Yr. 2004)
EG-004	63 HP (27 kW/0.029 MMBtu/hr) emergency natural gas-fired backup generator for the guard shack (Model Yr. 2004)
EG-005	838 HP (625 kW/5.385 MMBtu/hr) emergency diesel-fired backup generator for the HEP control room and SABA aeration (Model Yr. 2010)
EG-006	63 HP (27 kW/0.029 MMBtu/hr) emergency natural gas-fired IT backup generator (Model Yr. 2004)



### SECTION 3. EMISSION LIMITATIONS & STANDARDS

#### A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

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

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

3.A.3 The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AB-102	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.1	PM/PM <sub>10</sub> (filterable only)	3.54 lbs/hr and 15.51 tons/year
AI-102	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.2	PM/PM <sub>10</sub> (filterable only)	1.85 lbs/hr and 8.10 tons/year
AD-101	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM (filterable only)	0.6 lbs/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.4	SO <sub>2</sub>	4.8 lbs/MMBTU
AD-102	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.5	VOC	3.4 lbs/hr and 14.87 tons/year
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM (filterable only)	0.6 lbs/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.4	SO <sub>2</sub>	4.8 lbs/MMBTU
AD-103	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.6	PM/PM <sub>10</sub> (filterable only)	5.8 lbs/hr and 25.4 tons/year
			VOC	6.43 lbs/hr and 28.15 tons/year
AD-104	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.7	PM/PM <sub>10</sub> (filterable only)	1.48 lbs/hr and 6.48 tons/year
AE-004	Permit to Construct issued March 13, 1990, and modified February 26, 1991	3.B.8	PM/PM <sub>10</sub> (filterable only)	0.07 lbs/hr and 0.3 tons/year
AJ-101	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM (filterable only)	0.6 lbs/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.4	SO <sub>2</sub>	4.8 lbs/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AJ-102	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.9	VOC	2.95 lbs/hr and 12.91 tons/year
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM (filterable only)	0.6 lbs/MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.4	SO <sub>2</sub>	4.8 lbs/MMBTU
AJ-103	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.10	PM/PM <sub>10</sub> (filterable only)	5.8 lbs/hr and 25.4 tons/year
			VOC	10.26 lbs/hr and 44.95 tons/year
AJ-011	Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008	3.B.11	PM/PM <sub>10</sub> (filterable only)	0.6 lbs/hr and 2.3 tons/year
AL-101	PSD Construction Permit issued January 28, 2005, and modified in TVOP issued June 29, 2013	3.B.12	VOC	19.58 lbs/hr and 85.8 tons/year
AN-001	PSD Construction Permit issued January 28, 2005	3.B.13	VOC	4.9 lbs/hr and 13.6 tons/year
BS-001	Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010	3.B.14	PM/PM <sub>10</sub> (filterable only)	49.7 lbs/hr and 200.8 tons/year
			NO <sub>x</sub>	50.0 lbs/hr and 219.0 tons/year
BS-001	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in TVOP modified March 31, 2015	3.B.15	VOC	116.3 lbs/hr and 305.95 tons/year
			Operating restriction	Urea Formaldehyde or Phenol Formaldehyde Resins may be used in the processes controlled by the bioscrubber. Wood Furnish used may be a blend of up to 100% pine or hardwood.
BS-002	Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010	3.B.16	Fuel restriction	Wood fuel characteristics
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.17	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
BS-003	Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010	3.B.18	PM/PM <sub>10</sub> (filterable only)	3.0 lbs/hr not to exceed 13.0 tons/year
BS-004	Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010	3.B.19	PM/PM <sub>10</sub> (filterable only)	0.4 lbs/hr not to exceed 1.8 tons/year
AD-102 AD-103 AJ-102 AJ-103	40 CFR 63, Subpart QQQQ  NESHAP for Surface Coating of Wood Building Products  40 CFR 63.4680, 63.4681(a) and (b), 63.4682(a), (b), and (e), 63.4701, and Table 4 to Subpart QQQQ	3.B.20	HAP	Applicability
	40 CFR 63.4690(b) and Table 2, 63.4692(a), 63.4693(a) and 63.4700(a)(1) and (b), Subpart QQQQ	3.B.21		0.06 lbs HAP/gal solids
AL-101 AL-016 AL-017 AN-001 AN-002	40 CFR 63, Subpart WWWW  NESHAP for Reinforced Plastic Composites Production  40 CFR 63.5780, 63.5785(a), 63.5790(a) and (b), 63.5795(a), 63.5925, and Table 15 to Subpart WWWW	3.B.22	HAP	Applicability
	40 CFR 63.5805(d)(1) and (h), 63.5835(b) and (c), and Table 5 Subpart WWWW	3.B.23		Reduce total organic HAP emissions from these operations by at least 95 percent by weight
AB-101 AB-007 AC-101 AC-007 AI-101 AI-005 BS-001 BS-002	40 CFR 63, Subpart DDDD  NESHAP for Plywood and Composite Wood Products  40 CFR 63.2230, 63.2231(a) and (b), 63.2232, 63.2290, and Table 10 to Subpart DDDD	3.B.24	HAP	Applicability
	40 CFR 63.2240(b), Tables 1B and 2, and 63.2250(a), (b), (c), (f), and (g), Subpart DDDD	3.B.25		Reduce methanol, formaldehyde or total HAP emissions by 90 percent

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
EG-001 EG-002 EG-003 EG-004 EG-005 EG-006	40 CFR 63, Subpart ZZZZ  NESHAP for Stationary Reciprocating Internal Combustion Engines  40 CFR 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), (a)(2)(ii), and (c)(6), 63.6605(a) and (b), 63.6665, and Table 8 to Subpart ZZZZ	3.B.26	HAP	Applicability
EG-002 EG-003 EG-004 EG-006	40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ	3.B.27		Operating requirements
EG-005	40 CFR 60, Subpart IIII  Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII	3.B.28	NMHC+ NO <sub>x</sub> , PM (filterable only), CO, SO <sub>2</sub>	Applicability
EG-005	40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, Subpart IIII  and  40 CFR 89.112(a), and 89.113(a), Subpart B	3.B.29	NMHC+NO <sub>x</sub>  CO  PM (filterable only)  Opacity	6.4 g/kW-hr  3.5 g/kW-hr  0.20 g/kW-hr  Limits for acceleration and lugging modes in condition
	40 CFR 60.4207(b), Subpart IIII  and  40 CFR 80.510(b), Subpart I	3.B.30	SO <sub>2</sub>  (Diesel Fuel Requirements)	Max sulfur content of diesel fuel ≤15 ppm  Min. cetane index of 40 or max aromatic content of 35 volume percent
	40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII	3.B.31	NMHC+NO <sub>x</sub> , PM (filterable only), CO, SO <sub>2</sub>	Certified engine requirements
	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.B.32		Operating requirements
EG-001 EG-002 EG-003 EG-004 EG-005 EG-006	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.3	PM (filterable only)	0.6 lbs/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AB-102 AI-102 AD-011 AJ-011 AE-004 BS-001 BS-003 BS-004	40 CFR 64  Compliance Assurance Monitoring (CAM)  40 CFR 64.2(a), CAM	3.B.33	PM/PM <sub>10</sub>	Applicability

3.B.1 For Emission Point AB-102, the permittee shall limit emissions of filterable Particulate Matter (PM/PM<sub>10</sub>) to less than 3.54 lbs/hr not to exceed 15.51 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.2 For Emission Point AI-102, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 1.85 lbs/hr not to exceed 8.10 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.3 For Emission Points AD-101, AD-102, AJ-101, AJ-102, and EG-001 through EG-006, 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 heat input.

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

3.B.4 For Emission Points AD-101, AD-102, AJ-101, and AJ-102, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.B.5 For Emission Point AD-102, the permittee shall limit emissions of Volatile Organic Compounds (VOC) to less than 3.4 lbs/hr not to exceed 14.87 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.6 For Emission Point AD-103, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> and VOC to less than:

(a) PM/PM<sub>10</sub> – 5.8 lbs/hr not to exceed 25.4 tons/year

(b) VOC – 6.43 lbs/hr not to exceed 28.15 tons/year

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.7 For Emission Point AD-104, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 1.48 lbs/hr not to exceed 6.48 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.8 For Emission Point AE-004, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 0.07 lbs/hr not to exceed 0.3 tons/year.

(Ref.: Permit to Construct issued March 13, 1990, and modified February 26, 1991)

3.B.9 For Emission Point AJ-102, the permittee shall limit emissions of VOC to less than 2.95 lbs/hr not to exceed 12.91 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.10 For Emission Point AJ-103, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> and VOC to less than:

(a) PM/PM<sub>10</sub> – 5.8 lbs/hr not to exceed 25.4 tons/year

(b) VOC – 10.26 lbs/hr not to exceed 44.95 tons/year

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.11 For Emission Point AJ-011, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 0.6 lbs/hr and 2.3 tons/year.

(Ref.: Permit to Construct issued February 25, 1997, and modified July 20, 2000, July 27, 2001, and August 12, 2008)

3.B.12 For Emission Point AL-101, the permittee shall limit emissions of VOC to less than 19.58 lbs/hr not to exceed 85.8 tons/year.

(Ref.: PSD Construction Permit issued January 28, 2005, and modified via TVOP issued August 25, 2005)

3.B.13 For Emission Point AN-001, the permittee shall limit emissions of VOC to less than 4.9 lbs/hr not to exceed 13.6 tons/year.

(Ref.: PSD Construction Permit issued January 28, 2005)

3.B.14 For Emission Point BS-001, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> and NO<sub>x</sub>, to less than:

- (a) PM/PM<sub>10</sub> – 49.7 lbs/hr not to exceed 200.8 tons/year
- (b) NO<sub>x</sub> – 50.0 lbs/hr not to exceed 219.0 tons/year

(Ref.: Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010)

3.B.15 For Emission Point BS-001, the permittee shall limit emissions of VOC to less than 116.3 lb/hr, not to exceed 219.0 tons/year, and may use Urea Formaldehyde or Phenol Formaldehyde resins in the processes that have emissions controlled by the bioscrubber. Wood Furnish used in the process may be a blend of up to 100% pine or hardwood.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in TVOP modified March 31, 2015)

3.B.16 For Emission Point BS-002, the wood fuel fired shall be limited to uncontaminated wood (all forms and species), wood fiber (including wood fiber from pollution control devices and wastewater treatment units), and bark. All wood products manufactured at the facility may be utilized as fuel in the wood fired heater.

(Ref.: Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010)

3.B.17 For Emission Point BS-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission rate determined by the relationship

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

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

3.B.18 For Emission Point BS-003, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 3.0 lbs/hr not to exceed 13.0 tons/year.

(Ref.: Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010)

3.B.19 For Emission Point BS-004, the permittee shall limit emissions of filterable PM/PM<sub>10</sub> to less than 0.4 lbs/hr not to exceed 1.8 tons/year.

(Ref.: Permit to Construct issued January 14, 2009, and modified June 25, 2009, January 11, 2010, and December 2, 2010)

3.B.20 Emission Points AD-102, AD-103, AJ-102, and AJ-103 are subject to and shall comply with all applicable requirements of the National Emission Standards for Hazardous Air



Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ and the applicable requirements of the General Provisions, 40 CFR 63, Subpart A, as noted in Table 4 to Subpart QQQQ.

(Ref.: 40 CFR 63.4680, 63.4681(a) and (b), 63.4682(a), (b), and (c), 63.4701, and Table 4 to Subpart QQQQ)

- 3.B.21 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall limit organic HAP emissions to less than 0.06 lbs HAP/gal solids. Since the facility complies with this standard using the emission rate without add-on controls option, the permittee is not required to meet any operating limits or work practice standards for any of the coating operations.

The permittee shall be in compliance with the emission limit above at all times and shall operate and maintain the affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The permittee is not required to make further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether the source is operating in compliance with operation and maintenance requirements will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.4690(b) and Table 2, 63.4692(a), 63.4693(a), and 63.4700(a)(1) and (b), Subpart QQQQ)

- 3.B.22 Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002 are subject to and shall comply with all applicable requirements of the NESHAP for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW and the applicable requirements of the General Provisions, 40 CFR 63, Subpart A, as noted in Table 15 to Subpart WWWW. For purposes of compliance with Subpart WWWW, the reinforced plastic composites production is considered a new affected source with organic HAP emissions exceeding 100 tpy.

(Ref.: 40 CFR 63.5780, 63.5785(a), 63.5790(a) and (b), 63.5795(a), 63.5925, and Table 15 to Subpart WWWW)

- 3.B.23 For Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002, the permittee shall reduce the total organic HAP emissions from the Sheet Molding Compound (SMC) manufacturing process by at least 95 percent by weight (or 2.4 lbs/ton). The control device (AN-001) shall meet all applicable requirements of the National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices, and Routing to a Fuel Gas System or a Process, 40 CFR 63, Subpart SS.

The permittee shall be in compliance with the applicable organic HAP emission limits at all times. The permittee shall operate and maintain the affected sources, including air pollution

control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including startup, shutdown, and malfunction. During startup, shutdown, or malfunction, the general duty to minimize emissions requires the permittee to reduce emissions to the greatest extent which is consistent with safety and good air pollution practices. The general duty to minimize emissions does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.5805(d)(1) and (h), 63.5835(b) and (c), and Table 5, Subpart WWW)

- 3.B.24 Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-005, BS-001, and BS-002 are subject to and shall comply with all applicable requirements of the NESHAP for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD and the applicable General Provisions, 40 CFR 63, Subpart A, as noted in Table 10 to Subpart DDDD.

(Ref.: 40 CFR 63.2230, 63.2231(a) and (b), 63.2232, 63.2290, and Table 10 to Subpart DDDD)

- 3.B.25 For Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-005, BS-001, and BS-002, the permittee shall reduce methanol, formaldehyde, or total HAP measured as THC (as carbon) emissions by 90 percent. The permittee must maintain the 3-hour block average trickling filter media (TFM) water flow within the range established during the most recent performance test conducted in accordance with Condition 5.B.24.

Prior to August 13, 2021, the permittee shall be in compliance with the compliance options, operating requirements and work practice standards (Section 3.D) 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. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) 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.

Prior to August 13, 2021, the permittee shall operate and maintain the affected source(s), including associated air pollution control equipment according to the provisions in 40 CFR 63.6(e)(1)(i) and must develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3).

On and after August 13, 2021, the permittee shall be in compliance with the compliance options, operating requirements, and the work practice requirements in Subpart DDDD when the process unit(s) subject to the compliance options, operating requirements, and

work practice requirements are operating, except during safety-related shutdowns and pressurized refiner startups and shutdowns conducted according to the work practice requirements in Conditions 3.D.6 and 3.D.7, as applicable. The permittee shall minimize the length of time when compliance options and operating requirements are not met due to safety-related shutdowns.

On and after August 13, 2021, the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by Subpart DDDD. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the DEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.2240(b), Tables 1B and 2(4), and 63.2250(a), (b), (c), (f) and (g), Subpart DDDD)

- 3.B.26 Emission Points EG-001, EG-002, EG-003, EG-004, EG-005, and EG-006 are subject to and shall comply with the applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ and the applicable General Provisions, 40 CFR 63, Subpart A, as noted in Table 8 to Subpart ZZZZ.

For purposes of this subpart, Emission Point EG-002 is considered existing, emergency, compression ignition (CI) stationary RICE with a site rating of less than 500 HP located at a major source of HAP emissions and the permittee shall comply with the applicable requirements of Subpart ZZZZ.

Emission Points EG-003, EG-004, and EG-006 are considered existing, emergency spark ignition (SI) stationary RICE with a site rating of less than 500 HP located at a major source of HAP emissions and the permittee shall comply with the applicable requirements of Subpart ZZZZ.

Emission Point EG-001 is considered a new, emergency, CI stationary RICE with a site rating of less than 500 HP located at a major source of HAP emissions. The engine is required to comply with the requirements of Subpart ZZZZ by complying with the applicable requirements of Subpart III. However, the engine is a NFPA certified fire pump engine that was manufactured June 19, 2006; therefore, it does not meet the applicability under Subpart III. As such, the engine is not required to meet any additional requirements of Subparts ZZZZ or III. Since the engine is considered an emergency engine per Subpart ZZZZ, the engine must meet the emergency engine requirements specified in Condition 3.B.27.

Emission Point EG-005 is considered a new, emergency, CI stationary RICE with a site rating of greater than 500 HP located at a major source of HAP emissions. As such, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

Each engine subject to Subpart ZZZZ shall be in compliance with the applicable requirements of Subpart ZZZZ and the permittee shall operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6580, 63.6585(a) and (b), 63.6590(a)(1)(ii), (a)(2)(ii), and (c)(6), 63.6605(a) and (b), 63.6665, and Table 8 to Subpart ZZZZ)

3.B.27 For Emission Points EG-002, EG-003, EG-004, and EG-006, the engines shall be considered emergency stationary RICE under Subpart ZZZZ provided the engines only operate in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate an engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines.

- (a) There is no limit on the use of an engine during an emergency situation.
- (b) The permittee may operate an engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with an engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.
- (c) Emergency engines may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1)-(3), Subpart ZZZZ)

- 3.B.28 Emission Point EG-005 is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII and the applicable requirements of the General Provisions, 40 CFR 63, Subpart A, as noted in Table 8 to Subpart IIII.

(Ref.: 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII)

- 3.B.29 For Emission Point EG-005, the permittee shall operate and maintain the engine such that it achieves the following emission standards for the life of the engine:
- (a) Non-methane hydrocarbon and nitrogen oxides (NMHC + NO<sub>x</sub>) ≤ 6.4 g/kW-hr
  - (b) Carbon monoxide (CO) ≤ 3.5 g/kW-hr
  - (c) PM ≤ 0.2 g/kW-hr
  - (d) Opacity shall not exceed:
    - (i) 20 percent during the acceleration mode
    - (ii) 15 percent during the lugging mode, and
    - (iii) 50 percent during the peaks in either the acceleration or lugging modes.

(Ref.: 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII and 40 CFR 89.112(a) and 89.113(b), Subpart B)

- 3.B.30 For Emission Point EG-005, the permittee shall use diesel fuel that meets the following per gallon standards:
- (a) Maximum sulfur content of ≤ 15 ppm, and
  - (b) Minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and 40 CFR 80.510(b), Subpart I)

- 3.B.31 For Emission Point EG-005, the permittee shall comply with the emission standards contained in Condition 3.B.29 by purchasing, installing, operating, and maintaining an engine certified to meet the emission standards. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and can only change the emission-related settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII)

- 3.B.32 For Emission Point EG-005, the engine shall be considered an emergency stationary engine under Subpart IIII provided the engine only operates in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate the engine according to the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart IIII and must meet all requirements for non-emergency engines.

- (a) There is no limit on the use of the engine during an emergency situation.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with an engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an engine beyond 100 hours per calendar year.
- (c) The emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 60.4211(f)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1)-(3), Subpart IIII)

- 3.B.33 Emission Points AB-102, AI-102, AD-011, AJ-011, AE-004, BS-001, BS-003, and BS-004 are subject to and shall comply with all applicable requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), Compliance Assurance Monitoring)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO <sub>2</sub>	4.8 lbs/MMBTU

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

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

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

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

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AN-001	40 CFR 63.5805(d)(1), 63.5835(a), and Table 4, Subpart WWWW	3.D.1	HAP	SMC manufacturing requirements
AL-101 AL-016 AL-017 AN-002		3.D.2		Closed molding operation, cleaning, and storage requirements
AN-002	PSD Construction Permit issued January 28, 2005	3.D.3		SMC maturation room requirements
EG-002 EG-003 EG-004 EG-006	40 CFR 63.6602 and Table 2c, Subpart ZZZZ	3.D.4	HAP	Maintenance requirements
	40 CFR 63.6625(e) and (h), 63.6640(a), and Table 6, Subpart ZZZZ	3.D.5		Operating requirements
AB-001 AB-007 AC-101 AC-007 AI-101 AI-005 BS-001 BS-002	40 CFR 63.2241(a) and Table 3, Subpart DDDD  (Beginning August 13, 2021)	3.D.6	HAP	Safety-related shutdown requirements
AB-007 AC-007 AI-005	40 CFR 63.2241(a) and Table 3, Subpart DDDD  (Beginning August 13, 2021)	3.D.7		Pressurized refiner startup and shutdown requirements

3.D.1 For Emission Point AN-001, the permittee shall close or cover the resin delivery system to the doctor box on each SMC manufacturing machine (the doctor box itself may be open) and use a nylon containing film to enclose each SMC. The permittee shall comply with this work practice standard at all times.

(Ref.: 40 CFR 63.5805(d)(1), 63.5835(a), and Table 4, Subpart WWWW)

3.D.2 For Emission Points AL-101, AL-016, AL-017, and AN-002, the permittee shall comply with the following requirements at all times:

- (a) The permittee shall uncover, unwrap, or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge mean sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to



feed to slitting machines. Materials must be recovered after slitting.

- (b) The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- (c) The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

(Ref.: 40 CFR 63.5805(b), 63.5835(a), and Table 4 of Subpart WWWW)

3.D.3 For Emission Point AN-002, the permittee shall comply with the following:

- (a) The permittee shall not uncover, unwrap, or expose any material in the Maturation Room, other than for sampling, and
- (b) The permittee shall ensure all access doors and openings are closed, other than for entry or exit, when material is in the Maturation Room.

(Ref.: PSD Construction Permit issued January 28, 2005)

3.D.4 For Emission Points EG-002 (CI RICE) and Emission Points EG-003, EG-004 and EG-006 (SI RICE), the permittee shall comply with the following requirements:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first, or perform an oil analysis at the same frequency in order to extend the oil change requirement in accordance with 40 CFR 63.6625(i) or (j).
- (b) Inspect air cleaner (CI RICE) or spark plugs (SI RICE), every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
- (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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

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

3.D.5 For Emission Points EG-002, EG-003, EG-004, and EG-006, the permittee shall operate and maintain the engines according to the manufacturer's emission-related written

instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall minimize each engine's time spent at idle during startup and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

- 3.D.6 Beginning August 13, 2021, for Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-005, BS-001, and BS-002, the permittee shall follow documented site-specific safety-related shutdown procedures such as the use of automated controls or other measures that have been developed to protect workers and equipment to ensure that the flow of raw materials (such as furnish or resin) and fuel or process heat (as applicable) cease and that material is removed from the process unit(s) as expeditiously as possible given the system design to reduce air emissions.

(Ref.: 40 CFR 63.2241(a) and Table 3, Subpart DDDD)

- 3.D.7 Beginning August 13, 2021, for Emission Points AB-007, AC-007, and AI-005, the permittee shall route exhaust gases from the pressurized refiner to its dryer control system no later than 15 minutes after wood is fed to the pressurized refiner during startup. Stop wood flow into the pressurized refiner no more than 15 minutes after wood fiber and exhaust gases from the pressurized refiner stop being routed to the dryer during shutdown.

(Ref.: 40 CFR 63.2241(a) and Table 3, Subpart DDDD)

## SECTION 4. COMPLIANCE SCHEDULE

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

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

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

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

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) the date, place as defined in the permit, and time of sampling or measurements;
- (b) the date(s) analyses were performed;
- (c) the company or entity that performed the analyses;
- (d) the analytical techniques or methods used;
- (e) the results of such analyses; and
- (f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations,

and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

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

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

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

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

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

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AB-102 AD-103 AD-104 AE-004 AI-102 AJ-103 AJ-011 BS-001	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	PM/PM <sub>10</sub>	Weekly inspections
AD-103 AD-104 AJ-103	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Opacity	Weekly visible emissions observations; EPA Method 9 visible emissions evaluations, if applicable
BS-001	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	NO <sub>x</sub>	Biennial performance tests
		5.B.4	PM/PM <sub>10</sub>	
		5.B.5	VOC	
	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	Material usage	Records of quantity of UF and PF resins processed and records demonstrating emissions were controlled by bioscrubber
AB-102 AD-104 AE-004 AI-102 AJ-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.7	PM/PM <sub>10</sub>	Maintain sufficient bags/filters onsite
AD-102 AJ-102	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	VOC	Biennial performance test
AL-101	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.8	VOC	Keep monthly records of hours of operation and calculate monthly emissions and 12-month rolling total emissions
AN-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.9	VOC	Keep monthly records of SMC processed and calculate monthly emissions and 12-month rolling total emissions
AD-103 AJ-103	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.4	PM/PM <sub>10</sub>	Biennial performance test
		5.B.5	VOC	

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
BS-002	11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3)(a)(2).	5.B.10	Fuel	Records of quantity and type of wood fuel fired
AD-102 AD-103 AJ-102 AJ-103	40 CFR 63.4691(b), Subpart QQQQ	5.B.11	HAP	Compliance options
	40 CFR 63.4730(a)-(h) and (j) and 63.4731, Subpart QQQQ	5.B.12		Recordkeeping
	40 CFR 63.4752(a)-(c), Subpart QQQQ	5.B.13		Demonstrate continuous compliance for each rolling 12-month period
AL-101 AL-016 AL-017 AN-001 AN-002	40 CFR 63.5900(a)(1) and (4), (b) and (c), Subpart WWWW	5.B.14	HAP	Continuous compliance requirements
	40 CFR 63.5895(a) and (b), Subpart WWWW	5.B.15		Monitoring and recordkeeping to demonstrate continuous compliance
AN-001	40 CFR 63.5845 and 63.5850(a), (b), (d)-(f), and (h), Subpart WWWW	5.B.16	HAP	Performance test every five (5) years
	40 CFR 63.5855, Subpart WWWW	5.B.17		Control device requirements
	40 CFR 63.988, Subpart SS	5.B.18	Temperature	Continuously monitor temperature of gas stream immediately before and after catalyst bed
	40 CFR 63.996(c), Subpart SS	5.B.19		Operating and maintenance requirements for continuous parameter monitoring system (CPMS)
	40 CFR 63.998(a)(2), (b), (c)(2), and (d)(5), Subpart SS	5.B.20		Recordkeeping
AL-101 AL-016 AL-017 AN-001 AN-002	40 CFR 63.5915(a)-(d) and 63.5920, Subpart WWWW	5.B.21	HAP	Recordkeeping

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
BS-001	40 CFR 63.2251, Subpart DDDD	5.B.22	HAP	Routine control device maintenance exemption (RCDME)
	40 CFR 63.2270, 63.2271, and Table 7, Subpart DDDD	5.B.23		Continuous compliance requirements
	40 CFR 63.2262 and Table 7, Subpart DDDD	5.B.24		Performance testing
	40 CFR 63.2269(a), Subpart DDDD	5.B.25		Monitoring requirements
AB-101 AB-007 AC-101 AC-007 AI-101 AI-005 BS-001 BS-002	40 CFR 63.2282(a) and 63.2283, Subpart DDDD	5.B.26	HAP	Recordkeeping
EG-002 EG-003 EG-004 EG-006	40 CFR 63.6625(f) and 63.6655(f)(1), Subpart ZZZZ	5.B.27	HAP	Install non-resettable hour meter and record hours of operation
	40 CFR 63.6655(a)(1), (2), and (5), and (e)(2) and 63.6660, Subpart ZZZZ	5.B.28		General recordkeeping
EG-005	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.B.29	NMHC+ NO <sub>x</sub> , PM (filterable only), CO, SO <sub>2</sub>	Install non-resettable hour meter and record hours of operation
BS-001	40 CFR 64.3(a) and (b) and 64.6(c), CAM	5.B.30	PM/PM <sub>10</sub>	Weekly visual observations
AB-102 AI-102 AD-011 AJ-011 AE-004 BS-003 BS-004		5.B.31		Weekly visual observations and continuous monitoring of pressure drop
BS-001 AB-102 AI-102 AD-011 AJ-011 AE-004 BS-003 BS-004	40 CFR 64.7(b) and (c), CAM	5.B.32	PM/PM <sub>10</sub>	Operation and maintenance requirements for monitoring systems
	40 CFR 64.7(d), CAM	5.B.33		Corrective action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.34		Develop a Quality Improvement Plan (QIP), upon proper request
	40 CFR 64.9(b), CAM	5.B.35		Maintain CAM records as specified



- 5.B.1 For Emission Points AB-102, AD-103, AD-104, AE-004, AI-102, AJ-103, AJ-011, and BS-001, the permittee shall perform weekly inspections of the air pollution control equipment. Maintenance shall be performed as necessary to maintain proper operation of the pollution control equipment.

Records of weekly inspections and the details of any maintenance performed shall be kept in log form and made available for review upon request by the DEQ.

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

- 5.B.2 For Emission Points AD-103, AD-104, and AJ-103, , the permittee shall demonstrate compliance with the opacity limitations by conducting weekly visual observations of emissions from exhaust stacks during periods of operation. If any visible emissions are detected during the observations (with the exception of steam plumes), an EPA Reference Method 9 visible emissions evaluation shall be performed by a certified observer. Should the visible emissions evaluation exceed the opacity limit, the permittee shall take immediate corrective measures to restore equipment to normal operations. The permittee shall maintain records of weekly visible emission observations and results of any Method 9 visual emission evaluations that are performed, as well as any subsequent corrective measures, in a written or electronic log. If conditions are such that opacity readings cannot be taken using Method 9, the permittee shall note these conditions in the log and provide an explanation of why it was not possible to perform opacity readings/observations.

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

- 5.B.3 For Emission Point BS-001, the permittee shall demonstrate compliance with the nitrogen oxides (NO<sub>x</sub>) emission limitation by stack testing in accordance with EPA Reference Method 7. The permittee shall operate the source at maximum capacity during all performance tests unless otherwise approved by the DEQ. The permittee was required to complete the initial stack test and submit the corresponding test report by December 31, 2013. Subsequent stack tests shall be completed biennially thereafter.

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

- 5.B.4 For Emission Points BS-001, AD-103, and AJ-103, the permittee shall demonstrate compliance with the particulate matter (PM/PM<sub>10</sub>) emission limitations by stack testing in accordance with EPA Reference Methods 1-5. The permittee shall operate each source at maximum capacity during all performance test unless otherwise approved by the DEQ. The permittee was required to complete the initial stack tests and submit the corresponding test reports for Emission Points BS-001 and AD-103 by December 31, 2013. The initial stack test and submittal of the test report for Emission Point AJ-103 was required by December 31, 2014. Subsequent stack tests for each emission point shall be completed biennially thereafter.

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

5.B.5 For Emission Points BS-001, AD-102, AD-103, AJ-102, and AJ-103, the permittee shall demonstrate compliance with volatile organic compound (VOC) emission limitations by stack testing in accordance with EPA Reference Method 25A and Other Test Method 26 (also known as Wood Products Protocol 1 VOC (WPP1 VOC)). The permittee shall operate each source at maximum capacity during all performance test unless otherwise approved by the DEQ. The initial stack tests and submittal of the corresponding test reports for Emission Points BS-001, AD-102, and AD-103 were due by December 31, 2013. The initial stack tests and corresponding test reports for Emission Points AJ-102 and AJ-103 were due by December 31, 2014. Subsequent stack tests for all emission points shall be completed biennially thereafter.

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

5.B.6 For Emission Point BS-001, the permittee shall keep records concerning the type and monthly amount of resins used in the primary door lines which contain Urea Formaldehyde (i.e., UF resins) and Phenol Formaldehyde (i.e., PF resins). The permittee shall demonstrate through readily available records that when such resins are used emissions from the dryers and presses are routed to the bioscrubber for control.

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

5.B.7 For Emission Points AB-102, AD-104, AE-004, AI-102, and AJ-011, the permittee shall maintain sufficient bags/filters onsite as is necessary to repair the pollution control equipment expeditiously. In the event of a failure of the pollution control equipment, the permittee shall cease operations of the emission source controlled by the failed pollution control equipment until such time as repairs are made and the proper efficiency of the pollution control equipment is restored.

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

5.B.8 For Emission Point AL-101, the permittee shall demonstrate compliance with the hourly and annual VOC emission limits by determining the average monthly lb/hr VOC emissions and annual total VOC emissions (in tons per year) for each 12-month rolling period. The permittee shall calculate these emissions using the monthly amount of SMC processed, the hours the presses were operated each month (which may be determined by shifts worked), and a VOC emission factor determined from the maximum amount of styrene monomer content used and the emission factor for Compression Molding of SMC in the most recent version of the "UEF Emission Factors for Open Molding and Other Composite Process" (American Composites Manufacturers Association). (As of the date of permit issuance, the emission factor is 1.5% of the styrene monomer content (weight).) The permittee shall maintain records of the data used to determine the VOC emissions.

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

- 5.B.9 For Emission Point AN-001, the permittee shall demonstrate compliance with the annual VOC emission limit by determining the monthly amount of SMC processed and calculating emissions on a monthly and 12-month rolling total basis using an emission factor developed from the most recent stack test conducted. The emission factor shall be determined as pounds of VOC emitted per pound of SMC processed. The permittee shall maintain records of the data used to determine the VOC emissions.

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

- 5.B.10 For Emission Point BS-002, the permittee shall keep records detailing the type, quantity (monthly total), and origination of the wood fuel used in the Heat Energy Plant.

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

- 5.B.11 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall demonstrate compliance with the Subpart QQQQ emission limits using the emission rate without add-on controls compliance option. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document the switch in the records required in Condition 5.B.12 and report the switch in the next semiannual compliance report required in Condition 5.C.7.

(Ref.: 40 CFR 63.4691, Subpart QQQQ)

- 5.B.12 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall keep records of the following:

- (a) A copy of each notification and report that the permittee submitted to comply with Subpart QQQQ along with any supporting documentation.
- (b) A current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier.
- (c) For each compliance period, the following records shall be maintained:
  - (1) A record of the coating operations at which each compliance option was used and the time periods (beginning and ending dates and times) each option was used.

- (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating using Equation 2 from 40 CFR 63.4741.
  - (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month using Equations 1, 1A (or 1A-alt) through 1C, and 2 of 40 CFR 63.4751. If applicable, records of the calculation used to determine the mass of organic HAP in waste materials according to 40 CFR 63.4751(e)(4), the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.4751, and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4751.
- (d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
  - (e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
  - (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
  - (g) A record of the density for each coating used during each compliance period; and, if the emission rate without add-on controls compliance option is used, the density for each thinner and cleaning material used during each compliance period.
  - (h) If an allowance in Equation 1 of 40 CFR 63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, or disposal facility (TSDF) according to 40 CFR 63.4751(e)(4) is used, the permittee shall keep records of the information specified in (1) through (3) below:
    - (1) The name and address of each TSDF to which waste materials used in the allowance were sent to, a statement of which subparts under 40 CFR 262, 264, 265, and 266 apply to the facility, and the date of each shipment.
    - (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials.
    - (3) The methodology used in accordance with 40 CFR 63.4751(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
  - (i) The permittee shall keep records of the date, time, and duration of each deviation.

Failure to collect and keep records of the data and information specified above is considered a deviation of Subpart QQQQ. All records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. The permittee shall keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on site for at least two (2) years and then they may be kept off-site for the remaining three (3) years.

(Ref.: 40 CFR 63.4730(a)-(h), and (j), and 63.4731, Subpart QQQQ)

- 5.B.13 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall demonstrate continuous compliance with the Subpart QQQQ emission limit when using the emission rate without add-on controls compliance option in accordance with the following:
- (a) Demonstrating that the organic HAP emission rate for each compliance period, calculated using Equation 3 of 40 CFR 63.4751, must be less than or equal to the applicable emission limit in Condition 3.B.21. A compliance period consists of a rolling 12-month period. The permittee shall perform the calculations in 40 CFR 63.4751(a) through (g) on a monthly basis using data from the previous twelve (12) months of operation.
  - (b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit, this is considered a deviation from the emission limitations for that compliance period and must be reported per 40 CFR 63.4720(a)(6).
  - (c) As part of the semiannual compliance report, the permittee must identify the coating operations for which the emission rate without add-on controls option is used. If there are no deviations from the emission limitations, the permittee must submit a statement that the coating operation(s) were in compliance with the emission limitations during the period because the organic HAP emission rate for each compliance period was less than or equal to the emission limit in Condition 3.B.21.

(Ref.: 40 CFR 63.4752(a)-(c), Subpart QQQQ)

- 5.B.14 For Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002 the permittee shall demonstrate continuous compliance with the applicable requirements of Subpart WWWW in accordance with the following:
- (a) The permittee shall follow the procedures in 40 CFR 63, Subpart SS for the add-on control device.
  - (b) The permittee shall comply with the applicable work practice standards in Section 3.D by performing each required work practice.

The permittee shall report each deviation from the applicable standard according to the requirements of Condition 5.C.8. The permittee must meet the applicable organic HAP emission limits and work practice standards at all times.

(Ref.: 40 CFR 63.5900(a)(1) and (4), (b), and (c), Subpart WWWW)

- 5.B.15 For Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002 the permittee shall demonstrate continuous compliance with Subpart WWWW in accordance with the following:
- (a) The permittee shall collect and keep a record of data during production as indicated in 40 CFR 63, Subpart SS.
  - (b) The permittee shall monitor and collect data as specified in (1) through (4) below:
    - (1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.
    - (2) The permittee may not use data recorded during malfunctions, associated repairs, and required quality assurance or control activities for purposes of Subpart WWWW, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
    - (3) The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.
    - (4) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 63.5895(a) and (b), Subpart WWWW)

- 5.B.16 For Emission Point AN-001, the permittee shall conduct a performance test once every five (5) years. The performance test shall be conducted according to the following:
- (a) Each performance test shall be conducted in accordance with the applicable requirements of 40 CFR 63, Subpart SS. A summary of these requirements are contained in Table 6 of Subpart WWWW.
  - (b) Each performance test must be conducted in accordance with 40 CFR 63.7(e)(1) and the specific conditions from Subpart SS.
  - (c) The performance test may not be conducted during periods of startup, shutdown, or malfunction.
  - (d) The control device performance test using the emission measurement methods specified below:

- (1) Use either Method 1 or 1A of Appendix A to 40 CFR 60, as appropriate, to select the sampling sites.
  - (2) Use Method 2, 2A, 2C, 2D, 2F, or 2G of Appendix A to 40 CFR 60, as appropriate, to measure gas volumetric flow rate.
  - (3) Use Method 18 of Appendix A to 40 CFR 60 to measure organic HAP emissions or use Method 25A of Appendix A to 40 CFR 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If Method 25A is used, the permittee must assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If Method 18 is used and the number of organic HAP in the exhaust stream exceeds five, the permittee must take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP mass emissions. The permittee shall not use Method 18 to measure organic HAP emissions from a combustion device; instead use Method 25A and assume all gaseous organic mass emissions measured as carbon are organic HAP emissions.
  - (4) The permittee may use ASTM D6420-99 in lieu of Method 18 of 40 CFR 60, Appendix A, provided the conditions specified in 40 CFR 63.5850(e)(4)(i)-(iii) are met.
  - (5) Use the procedures in EPA Method 3B of Appendix A to 40 CFR 60 to determine an oxygen correction factor if required by 40 CFR 63.997(e)(2)(iii)(C). The permittee may use ASME PTC 19-10-1981-Part 10 as an alternative to Method 3B.
- (e) The control device performance test must consist of three runs and each run must last at least one (1) hour. The production conditions during the test runs must represent the normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.
- (f) During the performance test, the permittee must monitor and record separately the amounts of production resin, tooling resin, pigmented gel coat, clear gel coat, and tooling gel coat applied inside the enclosure that is vented to the control device.

(Ref.: 40 CFR 63.5845 and 63.5850(a), (b), (d)-(f), and (h), Subpart WWWW)

5.B.17 For Emission Point AN-001, the permittee shall monitor and operate all control devices in accordance with 40 CFR 63, Subpart SS, as addressed in Conditions 5.B.18 and 5.B.19.

(Ref.: 40 CFR 63.5855, Subpart WWWW)

5.B.18 For Emission Point AN-001, the permittee shall operate the catalytic oxidizer (or catalytic incinerator) at all times when emissions are vented to it. The permittee shall conduct performance tests according to the procedures in 40 CFR 63.997, as required by Condition 5.B.16. Temperature monitoring devices capable of providing a continuous record shall be installed in the gas stream immediately before and after the catalyst bed.

(Ref.: 40 CFR 63.988, Subpart SS)

5.B.19 For Emission Point AN-001, the permittee shall comply with the following requirements for the continuous parameter monitoring system (CPMS):

- (a) All monitoring equipment shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
- (b) The permittee shall maintain and operate each CPMS in a manner consistent with good air pollution control practices. The permittee shall ensure the immediate repair or replacement of CPMS parts to correct "routine" or otherwise predictable CPMS malfunctions. The necessary parts for routine repairs of the affected equipment shall be readily available. The DEQ's determination of whether acceptable operation and maintenance procedures are being used for the CPMS will be based on information that may include, but is not limited to, review of operation and maintenance procedures, operation and maintenance records as specified in 40 CFR 63.998(c)(1)(i) and (ii), manufacturer's recommendations and specifications, and inspection of the CPMS.
- (c) The CPMS shall be installed such that representative measurements of parameters from the regulated source are obtained.
- (d) Except for system breakdowns, repairs, maintenance periods, instrument adjustments, or checks to maintain precision and accuracy, the CPMS shall be in continuous operation when emissions are being routed to the monitored device.
- (e) The permittee shall establish a range for monitored parameters that indicates proper operation of the control device. In order to establish the range, the information required in 40 CFR 63.999(b)(3) shall be submitted in the Notification of Compliance Status or the operating permit application or amendment. The range may be based upon a prior performance test meeting the specifications of 40 CFR 63.997(b)(1).

(Ref.: 40 CFR 63.996(c), Subpart SS)

5.B.20 For Emission Point AN-001, the permittee shall maintain the following records:

- (a) *Performance test records.* The permittee shall make available to the DEQ such records as may be necessary to determine the condition of the performance tests



performed pursuant to 40 CFR 63.988(b). These performance test records shall include up-to-date, readily accessible continuous records of the upstream and downstream temperatures and the temperature difference across the catalyst bed averaged over the full period of the performance test and the percent reduction of organic HAP determined by 40 CFR 63.997(e)(2)(iv).

- (b) *Continuous records.* The permittee shall maintain a record of temperature values according to the following:
- (1) A record of values measured at least once every 15 minutes or each measured value for systems which measure more frequently than once every 15 minutes; or
  - (2) A record of block average values for 15-minute or shorter periods calculated from all measured data values during each period or from at least one measured data value per minute if measured more frequently than once per minute.
  - (3) Where data is collected from an automated continuous parameter monitoring system, the permittee may calculate and retain block hourly average values from each 15-minute block average period or from at least one measured value per minute if measured more frequently than once per minute, and discard all but the most recent three valid hours of continuous (15-minute or shorter) records, if the hourly averages do not exclude periods of CPMS breakdown or malfunction. An automated CPMS records the measured data and calculates the hourly averages through the use of a computerized data acquisition system
- (c) *Excluded data.* Monitoring data recorded during monitoring system breakdowns, repairs, preventive maintenance, and calibration checks, as well as during periods of non-operation of the process unit which result in cessation of emissions to which the monitoring applies, shall not be included in any average computed to determine compliance with the emission limit.
- (d) *Records of daily averages.* The permittee shall keep records of the following daily average temperatures:
- (1) Except as specified in paragraph (2) below, daily average values of each continuously monitored parameter shall be calculated from data meeting the specifications of paragraph (c) for each operating day and retained for five (5) years.
    - (i) The daily average shall be calculated as the average of all values for a monitored parameter recorded during the operating day. The average shall cover a 24-hour period if operation is continuous, or the period of operation per operating day if operation is not continuous. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the daily average instead of all measured values.

- (ii) The operating day shall be the period defined in the Notification of Compliance Status. The operating day is defined as midnight-to-midnight.
- (2) If all recorded values for a monitored parameter during an operating day are within the range established in the Notification of Compliance Status or in the operating permit, the permittee may record that all values were within the range and retain this record for five (5) years rather than calculating and recording a daily average for that operating day. In such cases, the permittee may not discard the recorded values as allowed in paragraph (b)(3).
- (e) *Excursions.* An excursion means that the daily average value of temperature monitoring data is less than the minimum inlet temperature and greater than the maximum temperature differential established during the most recent performance test. One excused excursion for each semiannual period is allowed and does not count toward the number of total excursions. During periods when continuous monitoring is not required, any excursion measured during such period is not a violation and does not count as the excused excursion for determining compliance.
- (f) *Monitoring records.* The permittee shall keep temperature records up-to-date and readily accessible, as applicable. The permittee shall keep records of the daily average value of each continuously monitored parameter for each operating day determined according to the procedures specified in paragraph (d). For catalytic incinerators, record the daily average of the temperature upstream of the catalyst bed and the daily average of the temperature differential across the bed. The permittee shall keep up-to-date, readily accessible records of periods of operation during which the parameter boundaries are exceeded. The parameter boundaries are established pursuant to Condition 5.B.19(e).
- (g) *Records of monitored parameters outside of range.* The permittee shall record the occurrences and the cause of periods when the upstream temperature and/or temperature differential are outside of the parameter ranges documented in the Notification of Compliance Status report or operating permit.

(Ref.: 40 CFR 63.998(a)(2), (b), (c)(2), and (d)(5), Subpart SS)

- 5.B.21 For Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002 the permittee shall keep the following records:
- (a) A copy of each notification and report submitted to comply with Subpart WWWW.
  - (b) Records of all required performance tests.
  - (c) For the control device, keep all records required in 40 CFR 63, Subpart SS, as addressed in Condition 5.B.20.
  - (d) Records of all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 5 of Subpart WWWW.

- (e) Keep a certified statement that the facility is in compliance with the applicable work practice requirements.

All records shall be maintained in such a manner that they can be readily accessed and are suitable for inspection upon proper request. The permittee shall keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records shall be kept onsite for at least two (2) years after the date of each record and may be kept offsite for the remaining three (3) years. The records may be kept in hard copy or computer readable form including, but not limited to, paper, microfilm, floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR 63.5915(a)-(d) and 63.5920, Subpart WWWW)

5.B.22 For Emission Point BS-001, the following maintenance activities have been approved by DEQ in response to the routine control device maintenance exemption (RCDME) request:

- (a) Trickling media replacement;
- (b) Trickling media flushing;
- (c) Bioscrubber interior cleaning;
- (d) Aeration tank bacteria colony replacement and stabilization;
- (e) Pumps and piping replacement;
- (f) Fans, blower, and ductwork replacement;
- (g) Disc screen replacement;
- (h) Structural repairs and maintenance; and
- (i) Control and ancillary equipment replacement/upgrade.

The compliance options and operating requirements will not be applicable to the bioscrubber when the maintenance activities listed above are being done. However, per 40 CFR 63.2251(b)(3), the permittee shall limit the downtime of the control device under the exemption to less than 3.0 percent of the annual operating uptime (rolling 365-day total) for each process unit being controlled. The permittee shall keep detailed records of the control device downtime that occurs as a result of one of the approved maintenance activities. A copy of the RCDME approval is contained in Appendix D.

(Ref.: 40 CFR 63.2251, Subpart DDDD)

5.B.23 For Emission Point BS-001, the permittee shall monitor and collect data in accordance with the following:

- (a) The permittee shall conduct all monitoring at all times the process unit is operating, except during periods of monitor malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), as appropriate. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated

repairs, out-of-control periods, or required quality assurance or control activities. Data collected during all other periods shall be used in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calibrations constitutes a deviation from the monitoring requirements.

- (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system.
- (c) The permittee shall determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excludes periods described in (a) and (b)).
- (d) To calculate the data averages for each 3-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data.

The permittee shall demonstrate continuous compliance with the compliance options and operating requirements, as applicable. Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the DEQ that they were operating the air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires the permittee to reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during these periods does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan), review of operation and maintenance records, and inspection of the source. Deviations that occur during periods of control device maintenance covered by the approved RCDME are not violations if you demonstrate to the DEQ's satisfaction that the permittee was operating in accordance with the approved RCDME.

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

5.B.24 For Emission Point BS-001, the permittee shall demonstrate continuous compliance with the methanol, formaldehyde, or HAP reduction requirement by conducting a performance test within 60 months following the previous performance test. Each performance test shall be conducted according to the following requirements:

- (a) Performance tests must not be conducted during periods of startup, shutdown, or malfunction and must be done under representative operating conditions. Representative operating conditions must be described in the test report and shall include an explanation as to why they are considered representative.
- (b) Each test shall consist of three separate 1-hour test runs.
- (c) The sampling sites must be located at the inlet and outlet of the control device and prior to any releases to the atmosphere.
- (d) The permittee must collect operating parameter monitoring system data at least every 15 minutes during the entire performance test and determine the parameter values for the operating requirement during the performance test using the methods specified in (i) below.
- (e) The permittee shall treat all non-detect data as one-half of the method detection limit (MDL) when determining total HAP, formaldehyde, methanol, or total hydrocarbon (THC) emission rates. Non-detect data for individual HAP must be treated as one-half of the MDL.
- (f) The permittee shall calculate the percent reduction across the control system using Equation 1 from 40 CFR 63.2262(h).
- (g) The permittee shall establish the operating requirements for the bioscrubber by continuously monitoring the bioscrubber trickling filter media (TFM) water flow during each of the required 1-hour test runs during the performance test.

(Ref.: 40 CFR 63.2262 and Table 7, Subpart DDDD)

5.B.25 For Emission Point BS-001, the permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following:

- (a) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording), for each successive 15-minute period.
- (b) The permittee must maintain the monitoring equipment including, but not limited to, maintaining the necessary parts for routine repairs of the monitoring equipment.
- (c) Keep a record of the results of each inspection, calibration, and validation check.

(Ref.: 40 CFR 63.2269(a), Subpart DDDD)

5.B.26 For Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-005, BS-001, and BS-002, the permittee shall keep the following records:

- (a) A copy of each notification and report submitted to comply with Subpart DDDD, including all supporting documentation.
- (b) The permittee shall keep records in accordance with 40 CFR 63.2282(a)(2) for startups, shutdowns, and malfunctions.
- (c) A copy of all documentation concerning the approved RCDME.
- (d) Records of all performance tests, CMS performance evaluations, and opacity/visible emission observations.

All records must be in a form suitable and readily available for expeditious review. Each record shall be kept for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records must be kept onsite for at least two (2) years after each is created and then may be kept offsite for the remaining three (3) years.

(Ref.: 40 CFR 63.2282(a) and 63.2283, Subpart DDDD)

- 5.B.27 For Emission Points EG-002, EG-003, EG-004, and EG-006, the permittee shall install a non-resettable hour meter (provided one not already installed) and keep records of the hours of operation recorded through the non-resettable hour meter for each engine. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6625(f) and 63.6655(f)(1), Subpart ZZZZ)

- 5.B.28 For Emission Points EG-002, EG-003, EG-004, and EG-006, the permittee shall keep the following records:
- (a) A copy of each notification and report submitted to comply with Subpart ZZZZ, including all supporting documentation.
  - (b) Records of the occurrence and duration of each malfunction of the engine or monitoring equipment.
  - (c) Records of actions taken during periods of malfunction to minimize emissions, including corrective actions taken to restore equipment to its normal and usual manner of operation.
  - (d) Records of all maintenance done on each engine in order to demonstrate that the engines were operated and maintained according to the maintenance plan.

All records must be in a form suitable and readily available for expeditious review. Each record must be kept for a period of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. These records may be kept in hard copy or electronic format.

(Ref.: 40 CFR 63.6655(a)(1), (2), and (5), and (e)(2), and 63.6660, Subpart ZZZZ)

- 5.B.29 For Emission Point EG-005, the permittee shall install a non-resettable hour meter prior to startup of the engine and keep records of the hours of operation of the engine in emergency and non-emergency service recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

- 5.B.30 For Emission Point BS-001, the permittee shall continuously monitor the trickling filter media (TFM) water flow and conduct weekly Method 9 visual emissions evaluations in accordance with the CAM Plan found in Appendix C.

(Ref.: 40 CFR 64.3(a) and (b) and 64.6(c), Compliance Assurance Monitoring)

- 5.B.31 For Emission Points AB-102, AI-102, AD-011, AJ-011, AE-004, BS-003, and BS-004, the permittee shall continuously monitor the pressure drop across each baghouse and conduct weekly visual observations in accordance with the CAM Plan found in Appendix C.

(Ref.: 40 CFR 64.3(a) and (b) and 64.6(c), Compliance Assurance Monitoring)

- 5.B.32 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-003, and BS-004, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper maintenance.* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (b) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c), Compliance Assurance Monitoring)

- 5.B.33 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-003, and BS-004, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d), Compliance Assurance Monitoring)

- 5.B.34 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-003, and BS-004, based on the results of a determination made under Condition 5.B.33, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8, Compliance Assurance Monitoring)

- 5.B.35 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-003, and BS-004, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.34 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be



maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b), Compliance Assurance Monitoring)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AD-103 AD-104 AJ-103	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	Opacity	Semiannual report of weekly visual observations and EPA Method 9 visual emissions evaluations (if applicable)
BS-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.2	PM/PM <sub>10</sub> NO <sub>x</sub> VOC	Submittal of test notice, protocol, and test results
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.3	Resin and wood furnish usage	Semiannual report of resin and wood furnish usage
AN-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.2	HAP	Submittal of test notice, protocol, and test results
AD-102 AJ-102	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.2	VOC	Submittal of test notice, protocol, and test results
AL-101 AN-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.4	VOC	Semiannual emissions report
AD-103 AJ-103	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.2	PM/PM <sub>10</sub> VOC	Submittal of test notice, protocol, and test results
BS-002	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5	Fuel usage	Semiannual report of type, quantity, and origination of wood fuel
AD-102 AD-103 AJ-102 AJ-103	40 CFR 63.4720(a) and (d)(2), Subpart QQQQ	5.C.6	HAP	Semiannual report
AL-101 AL-016 AL-017 AN-001 AN-002	40 CFR 63.5910 and Table 14, Subpart WWWW	5.C.7	HAP	Semiannual report
BS-001	40 CFR 63.2280(g), Subpart DDDD	5.C.8	HAP	Notification of change to continuous monitoring parameter
	40 CFR 63.2271(b), 63.2281, and Table 9, Subpart DDDD	5.C.9		Semiannual report
EG-001 EG-002 EG-003 EG-004	40 CFR 63.6640(b), 63.6650(f), and Footnote 1 to Table 2c, Subpart ZZZZ	5.C.10	HAP	Report deviations

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
EG-001 EG-002 EG-003 EG-004 EG-005 EG-006	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.11	Hours of operation	Semiannual report of hours of operation for each engine
BS-001 AB-102	40 CFR 64.9(a), CAM	5.C.12	PM/PM <sub>10</sub>	Semiannual reporting requirements
AI-102 AD-011 AJ-011 AE-004 BS-003 BS-004	40 CFR 64.7(e), CAM	5.C.13		Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring

5.C.1 For Emission Points AB-102, AD-103, AD-104, AE-004, AI-102, AJ-103, AJ-011, BS-001, BS-003, AND BS-004, the permittee shall submit a report summarizing the results of the weekly visual observations from each emission point and any results from EPA Reference Method 9 evaluations. The report shall be submitted semiannually in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2 R. 6.3.A(c)(1).)

5.C.2 For Emission Points BS-001, AD-102, AJ-102, AD-103, AJ-103, and AN-001 the permittee shall submit the following notifications and/or documents prior to conducting a stack test:

- (a) A written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. After the first successful submittal of a written test protocol in conjunction with a compliance test, the permittee may request that the resubmittal of the testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
- (b) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).
- (c) The results from each performance test shall be submitted to the DEQ within sixty (60) days following the completion of the test(s).

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

- 5.C.3 For Emission Point BS-001, the permittee shall submit a report summarizing the type and quantity of resins and wood furnish used during the reporting period. The report shall be submitted semiannually in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.4 For Emission Points AL-101 and AN-001, the permittee shall submit a summary of the annual rolling total of VOC emissions from each emission point for the six-month reporting period in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.5 For Emission Point BS-002, the permittee shall submit a report summarizing the type, quantity, and origination of all wood fuel used to fire the Heat Energy Plant. The report shall be submitted semiannually in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

- 5.C.6 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall submit a semiannual compliance report in accordance with Condition 5.A.4 that contains the following information:

- (a) Company name and address.
- (b) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
- (c) Date of the report and beginning and ending dates of the reporting period. The information for each of the six months in the reporting period will be based on the last twelve months of data prior to the date of each monthly calculation.
- (d) Identification of the compliance option or options used on each coating operating during the reporting period. If the permittee switched between compliance options during the reporting period, the beginning and ending dates of each option used shall be included in the report.
- (e) If the emission rate without add-on control compliance option was used during the reporting period, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (f) If there are no deviations from the emission limitations during the reporting period, the report shall include a statement that there were no deviations from the emission limitations during the reporting period.
- (g) If there was a deviation from the applicable emission limit during the reporting period, the permittee shall include the following information in the report:

- (1) If the deviation occurs while using the compliant material compliance option, the report shall include the following:
  - (A) Identification of each coating used that deviated from the emission limit, each thinner and cleaning material used that contained organic HAP, and the dates and time periods each was used.
  - (B) The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.4741) for each coating identified in (A).
  - (C) The determination of mass fraction of organic HAP for each coating, thinner, and cleaning material identified in (A).
  - (D) A statement of the cause of each deviation.
- (2) If the deviation occurs while using the emission rate without add-on controls compliance option, the report shall include the following:
  - (A) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 CFR 63.4690.
  - (B) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee shall provide the calculations for Equations 1, 1A (or 1A-alt) through 1C, 2, and 3 in 40 CFR 63.4751, and if applicable, the calculation used to determine the mass of organic HAP in waste materials according to 40 CFR 63.4751(e)(4).
  - (C) A statement of the cause of each deviation.

In addition to submitting the semiannual compliance reports to the DEQ, the permittee shall also submit all semiannual compliance reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The permittee shall use the appropriate electronic report in CEDRI for this subpart provided on the CEDRI website.

(Ref.: 40 CFR 63.4720(a) and (d)(2), Subpart QQQQ)

- 5.C.7 For Emission Points AL-101, AL-016, AL-017, AN-001, and AN-002, the permittee shall submit a semiannual compliance report in accordance with Condition 5.A.4 that contains the following information:
- (a) Company name and address.
  - (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (c) Date of the report and beginning and ending dates of the reporting period.

- (d) If there are no deviations from any organic HAP emission limitations or work practice standards, a statement that there were no deviations from the organic HAP emission limitations or work practice standards during the reporting period.
- (e) If there were no periods during which the continuous monitoring system (CMS) was out of control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.
- (f) If there is a deviation from an organic HAP emissions limitation or work practice standard, the compliance report must contain the information in (a) through (c) above and in (1) and (2) below. This includes periods of startup, shutdown, and malfunction.
  - (1) The total operating time of each affected source during the reporting period.
  - (2) Information on the number, duration, and cause of deviations (including unknown, if applicable) as applicable, and the corrective action(s) taken.
- (g) For each deviation from an organic HAP emissions limitation where you are using a CMS to comply with the organic HAP emissions limitation, the permittee must include the information in paragraphs (a) through (c) above and in paragraphs (g)(1) through (6) below.
  - (1) The date and time that each malfunction started and stopped.
  - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (3) The date, time, and duration that each CMS was out of control, including the information in 40 CFR 63.8(c)(8).
  - (4) The date and time that each deviation started and stopped.
  - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
- (h) If the permittee changes compliance options during the reporting period, the report shall include a statement of such.

(Ref.: 40 CFR 63.5910 and Table 14, Subpart WWWW)

- 5.C.8 For Emission Point BS-001, the permittee shall notify the DEQ in writing at least thirty (30) days before changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

(Ref.: 40 CFR 63.2280(g), Subpart DDDD)

- 5.C.9 For Emission Point BS-001, the permittee shall submit a semiannual compliance report in accordance with Condition 5.A.4 that contains the following information:
- (a) Company name and address.
  - (b) Statement by a responsible official with that official's name, title, and signature certifying the truth, accuracy, and completeness of the content of the report.
  - (c) Date of the report and beginning and ending dates of the reporting period.
  - (d) Before August 13, 2021, if there was a startup, shutdown, or malfunction during the reporting period and the actions taken were consistent with the SSMP, the report shall include the information specified in 40 CFR 63.10(d)(5)(i). On and after August 13, 2021, the compliance report must include the number of instances and total amount of time during the reporting period in which each of the startup/shutdown work practices in Conditions 3.D.6 and 3.D.7 are used. If a startup/shutdown work practice allowed by Condition 3.D.6 or 3.D.7 is used for more than a total of 100 hours during the semiannual reporting period, the permittee must report the date, time and duration of each instance when the startup/shutdown work practice was used.
  - (e) A description of any 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 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.
    - (3) A statement of whether or not the control device maintenance was included in the approved RCDME. If the control device maintenance was included in the RCDME, then report the information in paragraphs 40 CFR 63.2281(c)(5)(iii)(A) through (C).
  - (f) The results of any performance tests conducted during the semiannual reporting period.
  - (g) If there were no deviations from any compliance option or operating requirements, a statement that there were no deviations during the reporting period.
  - (h) If there were no periods during which the continuous monitoring system (CMS) was out-of-control, a statement that there were no periods during which the CMS was out-of-control during the reporting period.
  - (i) For each deviation from a compliance option or operating requirement where a CMS is not used to comply, the report shall contain the information in (a) through (f)

above and (1) and (2) below. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

- (1) The total operating time of each affected source during the reporting period.
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- (j) For each deviation from a compliance option or operating requirement where a CMS is being used to comply, the report shall contain the information in (a) through (f) above and (1) through (11) below. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
- (1) The date and time that each malfunction started and stopped.
  - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (3) The date, time, and duration that each CMS was out-of-control, including the information from 400 CFR 63.8(c)(8).
  - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in the approved RCDME; or during another period.
  - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
  - (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - (8) A brief description of the process units.
  - (9) A brief description of the CMS.
  - (10) The date of the latest CMS certification or audit.
  - (11) A description of any changes in CMS, processes, or controls since the last reporting period.

Beginning August 13, 2021, in addition to submitting the semiannual compliance reports to the DEQ, the permittee shall also submit all semiannual compliance reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The permittee shall



use the appropriate electronic report in CEDRI for Subpart DDDD provided on the CEDRI website.

(Ref.: 40 CFR 63.2271(b), 63.2281, and Table 9, Subpart DDDD)

- 5.C.10 For Emission Points EG-002, EG-003, EG-004, and EG-006, the permittee shall report all deviations from any emission or operating limitation of Subpart ZZZZ in the semiannual report required by Condition 5.A.4. Such deviations shall include any failure to perform the work practice on the required schedule. In the event a work practice is delayed because the engine is operating during an emergency or if performing the work practice on the required schedule posed an unacceptable risk under federal, state, or local law, the permittee shall include in the report the reason for the delay.

(Ref.: 40 CFR 63.6640(b), 63.6650(f), and Footnote 1 to Table 2c, Subpart ZZZZ)

- 5.C.11 For Emission Points EG-001, EG-002, EG-003, EG-004, EG-005, and EG-006, the permittee shall submit a summary in the semiannual report required in Condition 5.A.4 that contains the operating hours and reason for operation for each engine during the semiannual reporting period.

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

- 5.C.12 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-001, BS-003, and BS-004, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

- (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.31. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a), Compliance Assurance Monitoring)

- 5.C.13 For Emission Points BS-001, AB-102, AI-102, AD-011, AJ-011, AE-004, BS-001, BS-003, and BS-004, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges

or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e), Compliance Assurance Monitoring)

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

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

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

# APPENDIX A

## List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
RCDME	Routine Control Device Maintenance Exemption
SIP	State Implementation Plan
SO <sub>2</sub>	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**

### **List of Regulations Referenced In this Permit**

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended November 10, 2016)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 28, 2012)

40 CFR Part 82 – Protection of Stratospheric Ozone

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 CFR Part 63, Subpart SS – National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process

40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products

40 CFR Part 63, Subpart QQQQ – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products

40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 64 – Compliance Assurance Monitoring

# **APPENDIX C**

## **Compliance Assurance Monitoring Plans**



## CAM Plan for SABA Bioscrubber

### Emission Point BS-001

PM/PM <sub>10</sub>	Indicator No. 1	Indicator No. 2
<b>Indicator</b>	SABA TFM Water Flow	Opacity
<b>Measurement Approach</b>	Monitoring of water flow utilizing the facility data acquisition system	Visible emissions evaluation (VEE)
<b>Monitoring Method and Location</b>	Ultrasonic flow meters	EPA Method 9
<b>Indicator Range (including the corrective action taken for an excursion)</b>	< 9,000 GPM In the event of a reading less than 9,000 gpm a Method 9 VEE will be conducted	Opacity > 20% Manufacturing operations will cease in the event opacity is determined to be greater than 20%
<b>Monitoring Frequency</b>	Continuous	Weekly
<b>Data Collection/Recordkeeping Procedures</b>	A summary of readings will be included in the semiannual report	Weekly Method 9 VEEs will be recorded and filed. A summary of observations will be included in the semiannual report.
<b>Averaging Period</b>	3-hour block	6-minute
<b>QA/QC Practices</b>	Quarterly inspection and calibration of flow meters	Semiannual VEE certifications

## CAM Plan for Baghouses

**Emission Points AB-102 (includes AB-003, AB-004, AB-005, AB-008, AB-010, AC-003, AC-004), AI-102 (includes AI-003, AI-004, AI-006, AI-011), AD-011, AJ-011, AE-004, BS-003, and BS-004**

PM/PM <sub>10</sub>	Indicator No. 1	Indicator No. 2
<b>Indicator</b>	Differential pressure (DP)	Visual Observation
<b>Measurement Approach</b>	Monitoring of baghouse DP utilizing the facility data acquisition system.	NA
<b>Monitoring Method and Location</b>	Differential pressure gauge	EPA Method 22
<b>Indicator Range (including the corrective action taken for an excursion)</b>	<0.5" WC In the event of a reading < 0.5" WC an observation of the emission point will be made to validate the reading and determine if corrective measures are required.	Visible Emissions If visible emissions are detected, a Method 9 determination will be made to quantify opacity.
<b>Monitoring Frequency</b>	Continuous	Weekly
<b>Data Collection/Recordkeeping Procedures</b>	A summary of readings will be included in the semiannual report.	Observations will be recorded on the weekly baghouse inspection form. A summary of observations will be included in the semiannual report.
<b>Averaging Period</b>	3-hour block	NA
<b>QA/QC Practices</b>	Quarterly inspection and calibration of differential pressure gauges	Semiannual VEE certification

## **APPENDIX D**

### **Routine Control Device Maintenance Exemption**



**STATE OF MISSISSIPPI**  
HALEY BARBOUR  
GOVERNOR  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

August 6, 2010

Mr. Steven Bruntlett, Mill Manager  
Masonite Corporation  
PO Box 1048  
Laurel, MS 39441

Dear Mr. Bruntlett:

Re: Masonite Corporation  
Routine Control Device Maintenance Exemption  
Facility No. 1360-00028  
Jones County

We have completed our review of the referenced facility's request for an exemption from compliance during routine control maintenance events as allowed in §63.2251 of Subpart DDDD and have determined the request has merit and the exemption will be granted.

As we understand it, this exemption is necessary due to the level of maintenance required to keep the Scheuch SABA Bioscrubber operating efficiently. Based on the information submitted in your request, the following maintenance activities will be allowed under this exemption:

- 1) trickling media replacement;
- 2) trickling media flushing;
- 3) bioscrubber interior cleaning;
- 4) aeration tank bacteria colony replacement and stabilization;
- 5) pumps and piping replacement;
- 6) fans; blower and ductwork replacement;
- 7) disc screen replacement;
- 8) structural repairs and maintenance; and
- 9) control and ancillary equipment replacement/upgrade.

While the compliance options and operating requirements will not apply to the bioscrubber when the activities listed above are being done, please be advised that §63.2251(b)(3) limits the total downtime of the control device allowed under this exemption to less than 3.0 percent of the annual operating uptime for each process unit being controlled. Since the time necessary to perform all of the activities listed above would likely exceed the annual limit allowed under the exemption, it appears most of

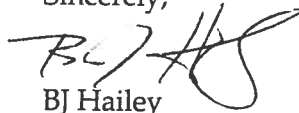
1774 REV20020002

Mr. Bruntlett  
August 6, 2010  
Page 2

these activities will have to be scheduled to coincide with normal process outages. As a result, the facility should keep a detailed record of the control device downtime that occurs as a result of one of the maintenance activities listed above during process uptime. This information should be maintained on a 365-day rolling total and should be summarized and reported semi-annually in accordance with the reporting requirements of the facility's Title V Operating Permit (TVOP). Additionally, in accordance with §63.2251(c), the maintenance exemption request and our approval will be incorporated into an appendix of the facility's TVOP.

If you have any questions, please feel free to call me at (601) 961-5783.

Sincerely,



BJ Hailey  
Air Toxics Branch

cc: Noah Kofman, Masonite  
Scott Hodges, EPD  
Tim Aultman, ECED