

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
PERMIT**

**AND PREVENTION OF SIGNIFICANT
DETERIORATION AUTHORITY
TO CONSTRUCT AIR EMISSIONS EQUIPMENT**

THIS CERTIFIES THAT

Roxul USA, Inc.
4594 Cayce Road
Byhalia, Marshall County, Mississippi

has been granted permission to construct air emissions equipment to comply with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with 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 and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: December 29, 2020

Permit No.: 1780-00052

PART 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit.

(Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. 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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. 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. 2.2.B(15)(b).)
8. The permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

9. The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ 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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the MDEQ 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. 2.2.B(15)(d).)

10. *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. *Solids Removal:* The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29)

12. *Diversion and Bypass of Air Pollution Controls:* The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.1.10, "Provisions for Upsets, Startups, and Shutdowns".

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

13. *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

(Ref.: Miss. Code Ann. 49-17-21)

15. *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

16. *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

17. *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

18. *Severability:* The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the 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. 2.1.D(7).)

19. *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
21. *Beginning Operation:* Except as prohibited in Part 1 – Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
22. *Application for a Permit to Operate:* Except as otherwise specified in Part 1 – Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
23. *Operating Under a Permit to Construct:* Except as otherwise specified in Part I, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
24. *Application Requirements for a Permit to Operate for Moderate Modifications:* For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of Prevention of Significant Deterioration / New Source Review (PSD / NSR), the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)
25. *Compliance Testing:* Regarding compliance testing:
- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), & (6).)

B. GENERAL NOTIFICATION REQUIREMENTS

- 1. Within fifteen (15) days of beginning actual construction, the permittee must notify the MDEQ in writing that construction has begun.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

- 2. The permittee must notify the MDEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- 3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)

- 4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

PART 2 EMISSION POINTS AND POLLUTION CONTROL DEVICES

The permittee is authorized to construct air emissions equipment and emit air contaminants from:

Emission Point	Facility ID	Description
AB-500	RFN2	Rockfon Line 2
AB-501	RFN750-6	IR Zone
AB-502	RFN750-4	Hot Press & Cure
AB-503	RFN750-3	De-Dusting Baghouse controlling filterable PM/PM ₁₀ /PM _{2.5} emissions from the crusher, splitting saw/belt sanding, formatting saw 1 & fleece cutting, formatting saw 2, milling, and edge sanding
AB-504	RFN750-8	Drying Oven 1, equipped with a particulate filter for control of filterable PM/PM ₁₀ /PM _{2.5} emissions
AB-505	RFN750-9	High Oven A
AB-506	RFN750-2	Drying Ovens 2 & 3 equipped with a particulate filter for control of filterable PM/PM ₁₀ /PM _{2.5} emissions
AB-507	RFN750-5	Cooling Zone
AB-508	RFN750-1	High Oven B
AB-509	RFN750-7	Spray Paint Cabin, equipped with spray booth filtration to control filterable PM/PM ₁₀ /PM _{2.5} emissions
AC-500	OFCFN	Off-line Confectioning
AC-501	RFN750-10	OFCFN Process 6: three (3) Paint Cabins, equipped with filters to control filterable PM/PM ₁₀ /PM _{2.5} emissions, and three (3) Drying Cabins
AC-502	RFN750-11	OFCFN De-Dusting Baghouse, controlling filterable PM/PM ₁₀ /PM _{2.5} emissions from Process 1 cutting and milling, Process 2 cutting and milling, Process 3 milling, Process 6 cutting, Process 6 dust cabin, Process 6 milling, and Process 7 cutting dust filter
AC-503	—	OFCFN Fugitive Emissions (from glue application from Processes 3, 4, 6 and 7)
AA-700	—	Insignificant Activities and Equipment
AA-701	RFN770-1	One (1) 0.08 MMBtu/hr indirect, natural gas-fired heater (Mech/Water Exhaust)
AA-702	RFN770-2	One (1) 0.03 MMBtu/hr indirect, natural gas-fired heater (W-TLT Exhaust)

AA-703	RFN770-3	One (1) 0.03 MMBtu/hr indirect, natural gas-fired heater (M-TLT Exhaust)
Emission Point	Facility ID	Description
AA-704	RFN950-102	One (1) 0.08 MMBtu/hr indirect, natural gas-fired heater (Paint Storage Relief AC Unit)
AA-705	RFN950-103	One (1) 0.12 MMBtu/hr indirect, natural gas-fired heater (Maintenance Exhaust)
AA-706	RFN950-104	One (1) 0.15 MMBtu/hr indirect, natural gas-fired heater (Office Relief Vent AC Unit)
AA-707	—	One (1) 212-gallon thermal oil expansion tank
AA-708	—	One (1) 159-gallon thermal oil drain tank
AA-709	—	One (1) 793-gallon paint dilution tank
AA-710	—	One (1) 397-gallon paint dilution day tank

Part 3
EMISSION POINT SPECIFIC LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AB-500 AC-500 AA-700	11 Miss. Admin. Code Pt. 2, R. 1.3.F	3.1	PM	$E = 4.1p^{0.67}$
	PSD Construction Permit Herein	3.2	Opacity	20%
AB-501 AB-502 AC-501 AC-503	PSD Construction Permit Herein	3.3	VOC	BACT: 53g/kg maximum VOC content of glue
AB-504 AB-505 AB-506 AB-507 AB-508 AB-509 AC-501 AC-503	PSD Construction Permit Herein	3.4	VOC	BACT: 80 g/L maximum VOC content of coatings and paint
AB-501 AB-502	PSD Construction Permit Herein	3.5	VOC	BACT: 7.48 tpy (combined)
AB-504 AB-505 AB-506 AB-507 AB-508 AB-509	PSD Construction Permit Herein	3.6	VOC	BACT: 30.69 tpy (combined)
AC-501	PSD Construction Permit Herein	3.7	VOC	BACT: 4.60 tpy
AC-503	PSD Construction Permit Herein	3.8	VOC	BACT: 1.12 tpy
AB-503	PSD Construction Permit Herein	3.9	PM ₁₀ (filterable only)	BACT: 0.35 lb/hr (12-hr average)
			PM _{2.5} (filterable only)	BACT: 0.18 lb/hr (12-hr average)
AC-502	PSD Construction Permit Herein	3.10	PM ₁₀ (filterable only)	BACT: 0.12 lb/hr (12-hr average)
			PM _{2.5} (filterable only)	BACT: 0.06 lb/hr (12-hr average)

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
AB-504 AB-505 AB-506 AB-508 AA-701 AA-702 AA-703 AA-704 AA-705 AA-706	PSD Construction Permit Herein	3.11	VOC PM ₁₀ PM _{2.5} SO ₂ NO _x	BACT: Natural Gas Fuel Only
AB-501 AB-502 AB-503 AB-504 AB-505 AB-506 AB-507 AB-508 AB-509 AC-501 AC-502 AC-503 AA-700	PSD Construction Permit Herein	3.12	VOC PM ₁₀ PM _{2.5} SO ₂ NO _x	BACT: Implement Good Work, Housekeeping, Operating, and Combustion Practices
AA-701 AA-702 AA-703 AA-704 AA-705 AA-706	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)	3.13	SO ₂	4.8 lb/MMBtu
AA-701 AA-702 AA-703 AA-704 AA-705 AA-706	11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(a)	3.14	PM	0.6 lb/MMBtu/hr
AB-504 AB-505 AB-506 AB-508	PSD Construction Permit Herein	3.15	NO _x	BACT: Utilize low NO _x burners
AB-503 AB-504 AB-506 AB-509 AC-501 AC-502	PSD Construction Permit Herein	3.16	PM / PM ₁₀ / PM _{2.5} (filterable only)	BACT: During process operations, utilize control devices and filters at all times

3.1 Except as otherwise specified, no person shall cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any

associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

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

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

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

- 3.2 For Emission Points AB-500, AC-500, and AA-700, the permittee shall limit opacity to no more than 20% (where otherwise not indicated and/or limited) as determined by EPA Method 9 or EPA Method 22.

(Ref.: PSD Construction Permit Herein.)

- 3.3 For Emission Points AB-501, AB-502, AC-501, and AC-503 (IR Zone, Hot Press & Cure, OFCFN Process 6 Paint Cabins and Drying Cabins, OFCFN Fugitives), the permittee shall utilize glue with a maximum VOC content of 53 g/kg in order to control VOC emissions (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.4 For Emission Points AB-504, AB-505, AB-506, AB-507, AB-508, AB-509, AC-501, and AC-503 (Drying Oven 1, High Oven A, Drying Ovens 2 & 3, Cooling Zone, High Oven B, Spray Paint Cabin, OFCFN Process 6 Paint Cabins and Drying Cabins, OFCFN Fugitives) the permittee shall utilize paint and coatings with a maximum VOC content of 80 g/L (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.5 For Emission Points AB-501 and AB-502 (IR Zone and Hot Press & Cure) the permittee shall limit VOC emissions to no more than 7.48 tons per year (tpy), combined, on a rolling 12-month basis (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.6 For Emission Points AB-504, AB-505, AB-506, AB-507, AB-508, and AB-509 (Drying Oven 1, Drying Ovens 2 & 3, High Oven A, High Oven B, Cooling Zone, Spray Paint Cabin) the permittee shall limit VOC emissions to no more than 30.69 tons per year (tpy) on a rolling 12-month basis (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.7 For Emission Point AC-501 (OFCFN Paint Cabins & Drying Cabins), the permittee shall limit VOC emissions to no more than 4.6 tons per year (tpy) on a rolling 12-month basis. (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.8 For Emission Point AC-503 (OFCFN Fugitives) the permittee shall limit VOC emissions to no more than 1.12 tons per year (tpy) on a rolling 12-month basis (BACT for VOC).

(Ref.: PSD Construction Permit Herein.)

- 3.9 For Emission Point AB-503 (RFN2 De-Dusting Baghouse), the permittee shall limit PM₁₀ (filterable only) to 0.35 pounds per hour (lb/hr), averaged over a 12-hour period and shall limit PM_{2.5} (filterable only) to 0.18 lb/hr averaged over a 12-hour period (BACT for PM₁₀ and PM_{2.5}).

(Ref.: PSD Construction Permit Herein.)

- 3.10 For Emission Point AC-502 (OFCFN De-Dusting Baghouse), the permittee shall limit PM₁₀ (filterable only) to 0.12 pounds per hour (lb/hr), averaged over a 12-hour period and shall limit PM_{2.5} (filterable only) to 0.06 lb/hr averaged over a 12-hour period (BACT for PM₁₀ and PM_{2.5}).

(Ref.: PSD Construction Permit Herein.)

- 3.11 For Emission Points AB-504, AB-505 AB-508, AB-506, and AA-701 through AA-706 (Drying Oven 1, Drying Ovens 2 & 3, High Oven A, High Oven B, RFN2 Misc. Natural Gas-Fired Sources), the permittee shall utilize natural gas fuel only (BACT for VOC, PM₁₀, PM_{2.5}, SO₂, and NO_x).

(Ref.: PSD Construction Permit Herein.)

- 3.12 For Emission Points AB-501, AB-502, AB-503, AB-504, AB-505, AB-506, AB-507, AB-508, AB-509, AC-501, AC-502, AC-503, AA-700 (IR Zone, Hot Press & Cure, RFN2 De-Dusting Baghouse, Drying Oven 1, Spray Paint Cabin, High Oven A, High Oven B, Drying Ovens 2 & 3, Cooling Zone, OFCFN Paint Cabins and Drying Cabins, OFCFN De-Dusting Baghouse, OFCFN Fugitive Emissions, RFN2 Misc. Natural Gas-Fired Sources, and Tanks) the permittee shall implement Good Work, Housekeeping, Operating, and Combustion Practices to control emissions of VOC, PM₁₀, PM_{2.5}, SO₂, NO_x, in accordance with the Plan required to be developed by Condition 4.3 of this Permit (BACT for VOC, PM₁₀, PM_{2.5}, SO₂, NO_x).

(Ref.: PSD Construction Permit Herein.)

- 3.13 For Emission Points AA-701 through AA-706, the permittee shall limit the 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 to 4.8 pounds (measured as sulfur dioxide) per million BTU (lb/MMBtu) heat input.

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

- 3.14 For Emission Points AA-701 through AA-706, the permittee shall limit emissions of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input to 0.6 pounds per million BTU per hour (lb/MMBtu/hr) heat input.

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

- 3.15 For Emission Points AB-504, AB-505, AB-506, AB-508 (Drying Oven 1, Drying Ovens 2 & 3, High Oven A, and High Oven B), the permittee shall utilize low NO_x burners (BACT for NO_x).

(Ref.: PSD Construction Permit Herein.)

- 3.16 For Emission Points AB-503, AB-504, AB-506, AB-509, AC-501, and AC-502 (RFN2 De-Dusting Baghouse, Drying Oven 1, Spray Paint Cabin, Drying Ovens 2 & 3, OFCFN Paint Cabins, OFCFN De-Dusting Baghouse) the permittee shall utilize control devices and filters at all times during process operations (BACT for PM₁₀ and PM_{2.5}).

(Ref.: PSD Construction Permit Herein.)

Part 4
EMISSION POINT SPECIFIC MONITORING AND RECORDKEEPING
REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AB-501 AB-502 AB-504 AB-505 AB-506 AB-507 AB-508 AB-509 AC-501 AC-503	PSD Construction Permit Herein	4.1	VOC	Monthly recordkeeping of VOC-containing material usage, quality, and density; monthly recordkeeping of VOC emissions on a rolling 12-month basis
AB-503 AC-502	PSD Construction Permit Herein	4.2	PM ₁₀ PM _{2.5} (filterable only)	Initial Stack Testing to establish operating parameters
AB-501 AB-502 AB-503 AB-504 AB-505 AB-506 AB-507 AB-508 AB-509 AC-501 AC-502 AC-503 AA-700	PSD Construction Permit Herein	4.3	VOC PM ₁₀ PM _{2.5} SO ₂ NO _x	Develop a Good Work, Housekeeping, Operating, and Combustion Practices Plan
AB-500 AC-500	PSD Construction Permit Herein	4.4	Opacity	Perform EPA Method 22 and/or EPA Method 9
AB-503 AC-502	PSD Construction Permit Herein	4.5	Opacity	Perform VEE's concurrent with stack/performance testing
AB-503 AB-504 AB-506 AB-509 AC-501 AC-502	PSD Construction Permit Herein	4.6	PM / PM ₁₀ / PM _{2.5}	Maintain monthly records documenting that the control devices and filters were utilized at all times during process operations

4.1 For Emission Points AB-501, AB-502, AB-504, AB-505, AB-506, AB-507, AB-508, AB-509, AC-501, AC-503 (IR Zone, Hot Press & Cure, Drying Oven 1, Spray Paint Cabin, High Oven A, High

Oven B, Drying Ovens 2 & 3, Cooling Zone, OFCFN Process 6 Paint Cabins and Drying Cabins, OFCFN Fugitives), in order to demonstrate compliance with the VOC content limits and VOC emission limits in Part 3 of this Permit, the permittee shall determine the following, for each coating, glue, or other VOC-containing material used, and maintain sufficient monthly records to document:

- (a) Quantity used in gallons or pounds;
- (b) The VOC content in grams per liter or grams per kilogram;
- (c) The density in pounds per gallon;
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or 311; and
- (e) The permittee shall calculate the VOC emissions from the use of VOC-containing materials (glue, coatings, paint, etc.), on a monthly basis and a 12-month rolling period.

(Ref.: PSD Construction Permit Herein.)

4.2 For Emission Points AB-503 (RFN2 De-Dusting Baghouse) and AC-502 (OFCFN De-Dusting Baghouse), the permittee shall perform an initial stack test within 180 days of certification of construction or within 60 days of reaching maximum production, whichever is earlier, to demonstrate compliance with the emissions limits established in Conditions 3.9 and 3.10 and to develop operational ranges (for example, pressure drop across the baghouses) to provide a reasonable assurance of compliance. Operational ranges shall be derived from stack test data, vendor certification, operational history, and visual inspections, the combination of which demonstrates the proper operation of the equipment in compliance. The permittee shall utilize the following Test Methods or an alternative EPA approved test method:

- (a) For filterable PM₁₀, the permittee shall utilize EPA Reference Method 5.
- (b) For filterable PM_{2.5}, the permittee shall utilize EPA Reference Method 201A.

(Ref.: PSD Construction Permit Herein.)

4.3 For Emission Points AB-501, AB-502, AB-503, AB-504, AB-505, AB-506, AB-507, AB-508, AB-509, AC-501, AC-502, AC-503, AA-700 (IR Zone, Hot Press & Cure, RFN2 De-Dusting Baghouse, Drying Oven 1, Spray Paint Cabin, High Oven A, High Oven B, Drying Ovens 2 & 3, Cooling Zone, OFCFN Paint Cabins and Drying Cabins, OFCFN De-Dusting Baghouse, OFCFN Fugitive Emissions, RFN2 Misc. Natural Gas-Fired Sources, and Tanks) the permittee shall develop a Good Work, Housekeeping, Operating, and Combustion Practices Plan to demonstrate compliance with the BACT standards for VOC, PM₁₀, PM_{2.5}, SO₂, NO_x in Condition 3.12 of this Permit. The Plan shall be submitted to MDEQ for review and approval within 90 days of certification of construction and shall include the following:

- (a) Emission point-specific practices to be implemented to minimize emissions. Examples of such practices include, but are not limited to: indoor floor sweeping, changing filters on a regular basis, equipment inspections, preventative maintenance, etc.

- (b) A schedule of when, and how frequently, these practices will be implemented for each emission point.
- (c) How implementation of these practices will be documented (e.g. logs, reports, spreadsheets, etc.) for each emission point.

(Ref.: PSD Construction Permit Herein.)

- 4.4 For Emission Points AB-500 and AC-500, the permittee shall have a certified visible emission evaluation (VEE) reader perform a visible emission observation once every four weeks for each of the emission points which vent to the atmosphere through a stack. If visible emissions are detected, a certified VEE reader shall perform a VEE using EPA Reference Method 9. If a VEE is performed using EPA Reference Method 9, then the observation period shall consist of a minimum of eighteen (18) consecutive minutes; However, if the visible emissions after a period of six (6) minutes are determined to be less than 10% opacity, then the reader can elect to discontinue doing the VEE. If VEE readings cannot be taken using EPA Reference Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform them. Results for each of the observations shall be recorded and kept onsite for the most recent three years for inspection by MDEQ personnel. The records from the remaining two years may be kept offsite and must be made available upon request.

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

- 4.5 For Emission Points AB-503 and AC-502 (RFN2 De-Dusting Baghouse and OFCFN De-Dusting Baghouse), the permittee shall have a certified visible emission evaluation (VEE) reader perform a visible emission observation concurrently with the filterable PM₁₀/PM_{2.5} Stack/Performance Testing required by Condition 4.2 of this Permit. For purposes of determining compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages). However, if visibility or other conditions prevent the opacity observations from being performed concurrently with the stack testing, the permittee shall reschedule the opacity observations as soon after the stack testing as possible, but no later than thirty (30) days thereafter, and shall notify the MDEQ of the rescheduled date. The rescheduled opacity observations shall be conducted (to the extent possible) under the same operating conditions that existed during the stack test.

(Ref.: PSD Construction Permit Herein.)

- 4.6 For Emission Points AB-503, AB-504, AB-506, AB-509, AC-501, and AC-502 (RFN2 De-Dusting Baghouse, Drying Oven 1, Spray Paint Cabin, Drying Ovens 2 & 3, OFCFN Paint Cabins, OFCFN De-Dusting Baghouse), the permittee shall maintain monthly records documenting that the control devices and filters were utilized at all times during process operations and shall record any required maintenance performed on the control devices.

(Ref.: PSD Construction Permit Herein.)

PART 5
EMISSION POINT SPECIFIC REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number	Reporting Requirement
AB-503 AC-502	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).	5.1	Notification of Stack/Performance Test due 30 days prior to testing
	11 Miss. Admin. Code Pt. 2, R. 2.6.B(6).	5.2	Submit Stack/Performance Test Reports no later than 60 days after the date of the test
AB-500 AC-500 AA-700	PSD Construction Permit Herein	5.3	Report deviations within 5 days
		5.4	Submit Semiannual Monitoring Reports

5.1 For Emission Points AB-503 and AC-502 (RFN2 De-Dusting Baghouse and OFCFN De-Dusting Baghouse), the permittee shall submit a notification 30 days prior to the performance testing required in Conditions 4.2 of this Permit. This notification shall include a description of the testing procedures and methods and the scheduled date of testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).)

5.2 For Emission Points AB-503 and AC-502 (RFN2 De-Dusting Baghouse and OFCFN De-Dusting Baghouse), the permittee shall submit reports of the performance test results required by Condition 4.2 of this Permit no later than 60 days after completing the performance tests. These reports shall include the following:

- (a) Detailed description of testing procedures and methods;
- (b) Sample calculation;
- (c) Results;
- (d) Comparison of results to all applicable emission limitations in this permit.
- (e) The operating parameters and ranges identified and established during initial stack testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(6).)

5.3 For Emission Points AB-500, AC-500, and AA-700, the permittee shall report, in writing, any deviations from this Permit within 5 days from the time the deviation began. The report shall include the probable cause of the deviation(s) and any corrective action(s) or preventative measures taken.

(Ref.: PSD Construction Permit Herein.)

5.4 For Emission Points AB-500, AC-500, and AA-700, the permittee shall submit semi-annual monitoring reports by July 31st and January 31st for the preceding six-month period. The semi-annual reports shall be certified by a Responsible Official and include the following:

- (a) For each coating, glue, or other VOC-containing material used:
 - (1) Quantity used in gallons or pounds;
 - (2) The VOC content in grams per liter or grams per kilogram, to demonstrate compliance with the VOC content limits in Conditions 3.3 and 3.4 of this Permit;
 - (3) The density in pounds per gallon;
 - (4) The calculated VOC emission rates in tons per year on a rolling 12-month basis, to demonstrate compliance with the VOC emission limits in Conditions 3.5 through 3.8 of this Permit.
- (b) A statement certifying compliance with the permittee's Good Work, Housekeeping, Operating, and Combustion Practices Plan.

(Ref.: PSD Construction Permit Herein.)