

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Huber Engineered Woods LLC  
3005 MS Highway 145  
Shuqualak, Mississippi  
Noxubee County

has been granted permission to construct air emissions equipment to comply with the 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.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: March 28, 2024**

**Permit No.: 2000-00044**

**Modified: August 12, 2025**

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 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).)
- 1.3 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).)
- 1.4 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).)
- 1.5 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).)
- 1.6 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).)
- 1.7 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).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (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 permit or, for information claimed to be confidential, the permittee shall furnish such records to the 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. 2.2.B(15)(d).)

- 1.9 *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(1)-(3).)

- 1.10 The necessary facilities shall be constructed to prevent any wastes or other products or substances to be placed in a location where they are likely to cause pollution of the air or waters of the State without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29(1) and (2))

- 1.11 *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).)

- 1.12 *General Nuisances:* 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.)

1.13 *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 at reasonable times 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) 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 contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *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.)

1.15 *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)

1.16 *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.)

1.17 *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).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *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).)
- 1.20 *Beginning Operation:* 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).)
- 1.21 *Application for a Permit to Operate:* 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).)
- 1.22 *Operating Under a Permit to Construct:* 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).)
- 1.23 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 five (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 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 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

- 1.24 *General Duty:* All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

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

- 1.25 *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), and (6).)

## SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

| Emission Point | Facility ID                | Description                                                                                                                                                                                                                | Control Equipment                                                                         |
|----------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| AA-100         | —                          | <b>Facility-Wide</b> (Huber Engineered Woods, LLC)                                                                                                                                                                         | —                                                                                         |
| AA-001         | DB<br>GCON<br>STR1<br>STR2 | <b>Green End Material Processing</b><br>Includes a debarker (DB), green end conveying (GCON), strander 1 (STR1), and strander 2 (STR2)                                                                                     | —                                                                                         |
| AA-002         | BB1<br>BB2<br>SB           | <b>Furnace/Fines Burner System</b><br>Two (2) 153 million BTU per hour (MMBTU/hr) bark burners (BB1 & BB2) and one (1) 40 MMBTU/hr wood dust / natural gas-fired suspension burner (SB) with associated thermal oil heater | Electrostatic precipitator (ESP) / selective non-catalytic reduction (SNCR)               |
| AA-003         | DRY1<br>DRY2<br>DRY3       | <b>Drum Dryers</b><br>Three (3) direct-fired rotary dryers, each with a capacity of 25 oven-dried tons per hour (ODT/hr) and each equipped with a cyclone for dry strand and wood fines recovery                           | Electrostatic precipitator (ESP) / three (3) regenerative thermal oxidizers (DRT01, 2, 3) |
| AA-004         | —                          | <b>Wood Handling</b>                                                                                                                                                                                                       | —                                                                                         |
|                | DF1<br>DF2                 | Two (2) dry fuel silos                                                                                                                                                                                                     | Baghouse (RBH)                                                                            |
|                | DS1<br>DS2<br>DS3          | Three (3) dry screens                                                                                                                                                                                                      | Baghouse (DSBH)                                                                           |
|                | BLD                        | Blending operations                                                                                                                                                                                                        |                                                                                           |
|                | FRM                        | Forming line                                                                                                                                                                                                               | Baghouse (FRMBH)                                                                          |
|                | SAW                        | Sawing lines                                                                                                                                                                                                               | Baghouse (SAWBH)                                                                          |
|                | SAND                       | Sanding lines                                                                                                                                                                                                              | Baghouse (SANDBH)                                                                         |
| AA-005         | PRESS                      | <b>Board Press</b><br>One (1) board press with a maximum throughput of 102.28 thousand square feet per hour of 3/8-inch thick board (MSF/hr 3/8" basis)                                                                    | Regenerative catalytic oxidizer (PRCO)                                                    |
| AA-006         | WY                         | <b>Wood Yard</b><br>Log and bark storage piles                                                                                                                                                                             | —                                                                                         |

| Emission Point | Facility ID                            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Control Equipment                                                             |
|----------------|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| AA-007         | DRT01<br>DRT02<br>DRT03<br>PRCO<br>BO1 | <b>Natural Gas Combustion</b><br>Three (3) 8 MMBTU/hr natural gas-fired burners for the 3 RTOs for the drum dryers, one (1) 25.6 MMBTU/hr natural gas-fired burner for the RCO for the press, and one (1) 1.5 MMBTU/hr natural gas-fired boiler for railcar unloading                                                                                                                                                                                                                                                                                                                | _____                                                                         |
| AA-008         | SOLV                                   | <b>Miscellaneous Solvent Usage</b><br>Two (2) edge sealing processes, two (2) edge stripe and stencil process, and two (2) water based branding ink processes                                                                                                                                                                                                                                                                                                                                                                                                                        | Panel filters on edge sealing processes and edge stripe and stencil processes |
| AA-009         | Misc Tanks                             | <b>Storage Tanks</b> <ul style="list-style-type: none"> <li>• SNCR storage tank for urea/NH<sub>4</sub>OH (15,000 gal)</li> <li>• Thermal oil drain tank (15,000 gal)</li> <li>• Two (2) slack wax storage tanks (25,000 gal each)</li> <li>• Five (5) MDI resin storage tanks (25,000 gal each)</li> <li>• Release agent storage tank (25,000 gal)</li> <li>• Release agent mix tank (500 gal)</li> <li>• Diesel tank (2,000 gal)</li> <li>• Gasoline tank (500 gal)</li> <li>• Fire pump diesel tank (300 gal)</li> <li>• Two (2) edge seal day use tanks (50 gal each)</li> </ul> | _____                                                                         |
| AA-010         | EG1                                    | <b>Emergency Generator Engine</b><br>570 HP natural gas-fired emergency generator engine [spark ignition (SI) reciprocating internal combustion engine (RICE)]                                                                                                                                                                                                                                                                                                                                                                                                                       | _____                                                                         |
| AA-011         | FP1                                    | <b>Fire Pump Engine</b><br>350 HP diesel-fired emergency fire pump engine [compression ignition (CI) RICE]                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | _____                                                                         |

### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

| Emission Point                                                               | Applicable Requirement                                                                                                                                                  | Condition Number(s) | Pollutant/Parameter                                                                                                                   | Limitation/Standard                                                                       |
|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| AA-100<br>(Facility-Wide)                                                    | 11 Miss. Admin. Code Pt. 2, R. 1.3.A.                                                                                                                                   | 3.1                 | Opacity<br>(smoke)                                                                                                                    | 40%                                                                                       |
|                                                                              | 11 Miss. Admin. Code Pt. 2, R. 1.3.B.                                                                                                                                   | 3.2                 | Opacity                                                                                                                               |                                                                                           |
|                                                                              | 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).                                                                                                                                | 3.3                 | PM<br>(filterable)                                                                                                                    | $E = 4.1 p^{0.67}$                                                                        |
|                                                                              | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).<br><br>(PSD Avoidance Limits)                                                                                                 | 3.4                 | PM<br>(filterable)                                                                                                                    | 249.0 tpy (rolling 12-month total)                                                        |
|                                                                              |                                                                                                                                                                         |                     | PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable + condensable)                                                                    | 249.0 tpy (rolling 12-month total)                                                        |
|                                                                              |                                                                                                                                                                         |                     | NO <sub>x</sub>                                                                                                                       | 249.0 tpy (rolling 12-month total)                                                        |
|                                                                              |                                                                                                                                                                         |                     | CO                                                                                                                                    | 249.0 tpy (rolling 12-month total)                                                        |
|                                                                              |                                                                                                                                                                         |                     | VOCs                                                                                                                                  | 249.0 tpy (rolling 12-month total)                                                        |
|                                                                              |                                                                                                                                                                         | 3.5                 | PM<br>(filterable)<br>PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable + condensable)<br><br>NO <sub>x</sub><br><br>CO<br><br>VOCs | Operate control devices at all times the corresponding process equipment is operating     |
| AA-001<br>AA-002<br>AA-003<br>AA-004<br>AA-005<br>AA-006<br>AA-008<br>AA-009 | 40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products<br><br>40 CFR 63.2231; 63.2232(a), (b), and (c); 63.2252; 63.2290 and Table 10; Subpart DDDD | 3.6                 | HAP                                                                                                                                   | General Applicability                                                                     |
| AA-002                                                                       | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                                                                                                                               | 3.7                 | Allowable Fuels                                                                                                                       | Use only bark, wood residue, natural gas, and on-site generated process materials as fuel |

| Emission Point                       | Applicable Requirement                                                                                                                                                                      | Condition Number(s) | Pollutant/Parameter                      | Limitation/Standard                                                                                                    |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| AA-002                               | 40 CFR Part 60, Subpart Db – NSPS for Industrial-Commercial-Institutional Steam Generating Units<br>40 CFR 60.40b(a); Subpart Db                                                            | 3.8                 | SO <sub>2</sub><br>PM<br>NO <sub>x</sub> | General Applicability                                                                                                  |
|                                      | 40 CFR 60.42b(k)(2); Subpart Db                                                                                                                                                             | 3.9                 | SO <sub>2</sub>                          | Use fuels with a potential emission rate of $\leq 0.32$ lb SO <sub>2</sub> per MMBTU heat input                        |
|                                      | 40 CFR 60.43b(h)(1), (f) and (g), and 60.46b(a); Subpart Db                                                                                                                                 | 3.10                | PM (filterable)                          | 0.030 lb/MMBTU                                                                                                         |
|                                      |                                                                                                                                                                                             |                     | Opacity                                  | 20% (6-minute average) except for one 6-minute period per hour of not more than 27% opacity.                           |
|                                      | 40 CFR 60.44b(d) and (l)(1); Subpart Db<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                                                                                                    | 3.11                | Fuel Requirement                         | 10% maximum annual capacity factor for natural gas and oil                                                             |
| AA-002 (SB)                          | 40 CFR 63.7500(c); Subpart DDDDD<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).                                                                                                           | 3.12                | Fuel Requirement                         | 10% maximum annual capacity factor for any fuel                                                                        |
| AA-002<br>AA-007<br>AA-010<br>AA-011 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)–(b) and (2).                                                                                                                                     | 3.13                | PM (filterable)                          | 0.6 lb/MMBTU/hr (for units < 10 MMBTU/hr)<br><br>$E = 0.8808 I^{-0.1667}$ (for units >10 MMBTU/hr)<br><br>0.30 gr/dscf |
| AA-002<br>AA-007 (BO1)               | 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).                                                                                                                                                    | 3.14                | SO <sub>2</sub>                          | 4.8 lb/MMBTU                                                                                                           |
| AA-002 (SB)<br>AA-007 (BO1)          | 40 CFR Part 63, Subpart DDDDD – NESHAP for Industrial-Commercial-Institutional Boilers and Process Heaters<br><br>40 CFR 63.7485, 63.7490(a)(2), (b), and 63.7499(l) and (o); Subpart DDDDD | 3.15                | HAPs                                     | General applicability                                                                                                  |

| Emission Point             | Applicable Requirement                                                                                                                                                      | Condition Number(s) | Pollutant/Parameter                          | Limitation/Standard                                                                                                                      |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| AA-003<br>AA-005           | 40 CFR 63.2240(b) and Table 1B; Subpart DDDD                                                                                                                                | 3.16                | HAPs                                         | 90% reduction efficiency [measured as THC (as carbon)]                                                                                   |
|                            | 40 CFR 63.2240(b) and Table 2; Subpart DDDD                                                                                                                                 | 3.17                | Firebox Temperature<br><br>Catalyst Activity | Maintain 3-hour block average firebox temperature (for RTO / RCO)<br><br>Check activity level of catalyst annually (for RCO)             |
| AA-003<br>AA-005<br>AA-008 | 40 CFR 63.2233(a)(2), 40 CFR 63.2250(f)(1),(2) and (g); Subpart DDDD                                                                                                        | 3.18                | HAP                                          | General requirements                                                                                                                     |
| AA-010                     | 40 CFR Part 60, Subpart JJJJ – NSPS: Stationary Spark Ignition Internal Combustion Engines<br><br>40 CFR 60.4230(a)(4)(iv) and 60.4246; Subpart JJJJ                        | 3.19                | NO <sub>x</sub><br><br>CO<br><br>VOC         | General applicability                                                                                                                    |
|                            | 40 CFR 60.4233(e), 60.4243(b)(1), 60.4234, and Table 1; Subpart JJJJ                                                                                                        | 3.20                |                                              | Emission standards                                                                                                                       |
| AA-011                     | 40 CFR 60, Subpart IIII – NSPS for Stationary CI ICE<br><br>40 CFR 60.4200(a)(2)(ii) and 60.4218; Subpart IIII                                                              | 3.21                | NMHC+NO <sub>x</sub><br><br>PM<br><br>CO     | General applicability                                                                                                                    |
|                            | 40 CFR 60.4205(c), 60.4206, 60.4211(a) and (c), Table 4; Subpart IIII                                                                                                       | 3.22                |                                              | Emission standards                                                                                                                       |
| AA-010<br>AA-011           | 40 CFR 60.4211(f); Subpart IIII; 40 CFR 60.4243(d); Subpart JJJJ                                                                                                            | 3.23                | Operational Requirement                      | 100 hours per calendar year for maintenance checks and readiness testing;<br><br>50 hours per calendar year for non-emergency situations |
|                            | 40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines<br><br>40 CFR 63.6585, 63.6665, 63.6590(a)(2)(i) and (b)(1)(i); Subpart ZZZZ | 3.24                | HAPs                                         | General applicability                                                                                                                    |

- 3.1 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause 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 percent (40%) opacity subject to the following exceptions:
- (a) Start-up 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) start-ups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) 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 (1) hour.

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

- 3.2 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant or emissions of such opacity as to obscure an observer's view to a degree in excess of forty (40) percent opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

- 3.3 For Emission Point AA-100 (Facility-Wide), except as otherwise specified herein, the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following 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. The conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

- 3.4 For Emission Point AA-100 (Facility-Wide), the permittee shall limit the total emissions of particulate matter (PM), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOCs) to no more than 249.0 tons per year (tpy) for each pollutant, based on a rolling 12-month total.

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

- 3.5 For Emission Point AA-100 (Facility-Wide), the permittee shall at all times operate the control devices associated with each process equipment during active operation. The permittee shall operate each control device in accordance with the manufacturer's design, specification requirements and recommendations. In the event that a control device malfunctions or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring the device back to normal operation or cease the operation of the associated process equipment.

For Emission Point AA-003, when the permittee does not operate all three dryers (DRY1, DRY2 and DRY3) or operates the dryers at reduced throughputs, the permittee may operate as many of the regenerative thermal oxidizers (DRTO1, DRTO2, and DRTO3) as necessary to achieve the emission standard in Condition 3.16.

(Ref.: 11 Miss. Admin. Code Pr. 2, R. 2.2.B(10). – PSD Avoidance Limit)

- 3.6 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-008, and AA-009, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products and the applicable requirements of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 10 to Subpart DDDD.

For Emission Points AA-001, AA-002, AA-004, AA-006, and AA-009, the permittee is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, and recordkeeping or reporting requirements of Subpart DDDD, or any other requirements of Subpart A, except for the initial notification requirement. In accordance with 40 CFR 63.9(b)(1)(iii), the initial notification requirement was fulfilled with the receipt of the permit to construct application on June 23, 2023.

(Ref.: 40 CFR 63.2231, 63.2232(a), (b), and (c), 63.2252, 63.2290, and Table 10; Subpart DDDD)

- 3.7 For Emission Point AA-002, the permittee is authorized to combust bark, natural gas, wood residuals (resinated and unresinated), and on-site generated process materials (e.g., paper products, ESP waste, hydraulic oil, hot oil wastes) as fuel within the burners.

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

- 3.8 For Emission Point AA-002, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units and of 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.40b(a); Subpart Db)

- 3.9 For Emission Point AA-002, the permittee shall use only very low sulfur oil, gaseous fuel, a mixture of these fuels, or a mixture of these fuels with any other fuels with a potential sulfur dioxide (SO<sub>2</sub>) emission rate of 0.32 lb/MMBTU heat input or less.

(Ref.: 40 CFR 60.42b(k)(2); Subpart Db)

- 3.10 For Emission Point AA-002, the permittee shall comply with the following limitations at all times except during periods of start-up, shutdown, or malfunction:

- (a) Particulate matter (PM): no more than 0.030 lb/MMBTU of heat input; and
- (b) Opacity: no more than 20 percent (based on a 6-minute average) except for one 6-minute period per hour of not more than 27 percent.

(Ref.: 40 CFR 60.43b(h)(1), (f) and (g), and 60.46b(a); Subpart Db)

- 3.11 For Emission Point AA-002 (BB1, BB2 and SB), the permittee is limited to an “annual capacity factor” (as defined in 40 CFR 60.41b) of 10 percent (0.10) for natural gas and oil as fuel.

(Ref.: 40 CFR 60.44b(d) and (l)(1); Subpart Db and and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.12 For Emission Point AA-002 (SB), when the unit operates outside of normal conditions (as defined in Condition 5.9) the permittee is limited to an “annual capacity factor” (as defined in 40 CFR 63.7575) of 10 percent (0.10) for any solid, liquid, or gaseous fuels, or for a maximum of 876 hours per year.

(Ref.: 40 CFR 63.7500(c); Subpart DDDDD and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

- 3.13 For Emission Points AA-002, AA-007, AA-010, and AA-011, the maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations shall be limited as follows:

- (a) Emissions from installations of less than 10 million BTU per hour (MMBTU/hr) heat input shall not exceed 0.6 pounds per million BTU per hour (lb/MMBTU/hr) heat input.
- (b) Emissions from installations equal to or greater than 10 MMBTU/hr heat input but less than 10,000 MMBTU/hr heat input shall not exceed an emission rate as 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.

- (c) Fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, to produce steam or heat water or any other heat transfer medium through indirect means may be allowed emission rates up to 0.30 grains per dry standard cubic foot (gr/dscf).

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

- 3.14 For Emission Points AA-002 and AA-007 (BO1), 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 (lb/MMBTU).

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

- 3.15 For Emission Points AA-002 (SB) and AA-007 (BO1), the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial-Commercial-Institutional Boilers and Process Heaters and 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 10 of Subpart DDDDD.

Emission Point AA-002 (SB) is considered a new boiler in the “limited-use boilers and process heaters” subcategory and Emission Point AA-007 (BO1) is considered a new boiler in the “units designed to burn gas 1 fuels” subcategory.

(Ref.: 40 CFR 63.7485, 63.7490(a)(2), (b), and 63.7499(l) and (o); Subpart DDDDD)

- 3.16 For Emission Points AA-003 and AA-005, the permittee shall operate the regenerative thermal oxidizer for each process unit, in such a manner as to reduce the emission of total hazardous air pollutants (HAPs) by 90% [measured as total hydrocarbons (THC) – as carbon].

(Ref.: 40 CFR 63.2240(b); Table 1B, compliance option (1); Subpart DDDD)

- 3.17 For Emission Points AA-003 and AA-005, the permittee shall maintain the 3-hour block average firebox temperature for each RTO / RCO (DRTO1, DRTO2, DRTO3, and PRCO) above the minimum temperature established during the most recent performance test that demonstrates compliance with the HAP [measured as THC – as carbon] destruction efficiency standard specified in Condition 3.16.

For Emission Point AA-005 only, the permittee shall check the activity level of the representative sample of the catalyst annually. The permittee may forego the annual catalyst check during the calendar year when a performance test is conducted according to 40 CFR Part 63, Subpart DDDD – Table 4.

(Ref.: 40 CFR 63.2240(b) and Table 2 – (1) Thermal oxidizer and (2) Catalytic oxidizer; Subpart DDDD)

- 3.18 For Emission Points AA-003, AA-005, and AA-008, the permittee shall comply with the compliance options, operating requirements, and the work practice requirements found in Subpart DDDD when the applicable process units are operating, except prior to process unit initial startup and during safety-related shutdowns conducted in accordance with the work practice requirements in Conditions 4.2 and 4.3 (as applicable).

The permittee must always operate and maintain the process units, 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 the permittee is operating in compliance with operation and maintenance requirements 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 63.2233(a)(2), 63.2250(f)(1),(2) and (g); Subpart DDDD)

- 3.19 For Emission Point AA-010, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions, as specified in Table 3 to Subpart JJJJ

(Ref.: 40 CFR 60.4230(a)(4)(iv) and 60.4246; Subpart JJJJ)

- 3.20 For Emission Point AA-010, the permittee shall purchase an engine certified to the emission standards found in Table 1 of Subpart JJJJ for emergency engines over 130 HP. The permittee shall operate and maintain the engine such that the emission standards below are achieved over the entire life of the engine.

- (a) NO<sub>x</sub>: 2.0 g/HP-hr (160 ppmvd at 15% O<sub>2</sub>)
- (b) CO: 4.0 g//HP-hr (540 ppmvd at 15% O<sub>2</sub>)
- (c) VOC: 1.0 g/HP-hr (86 ppmvd at 15% O<sub>2</sub>)

(Ref.: 40 CFR 60.4233(e), 60.4243(b)(1), 60.4234, and Table 1; Subpart JJJJ)

- 3.21 For Emission Point AA-011, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions, as specified in Table 8 to Subpart IIII.

(Ref.: 40 CFR 60.4200(a)(2)(ii) and 60.4218; Subpart IIII)

- 3.22 For Emission Point AA-011, the permittee shall:

- (a) Purchase an engine certified to meet the emission standards found in Table 4 of Subpart IIII for engines 300 - 600 HP for model years 2009 and later:
  - (1) NMHC + NO<sub>x</sub>: 4.0 g/KW-hr (3.0 g/HP-hr)
  - (2) CO: 3.5 g/KW-hr (2.6 g/HP-hr)

(3) PM: 0.20 g/KW-hr (0.15 g/HP-hr)

- (b) Install, configure, operate, and maintain the engine according to the manufacturer's emission-related specifications such that the emission standards are achieved over the entire life of the engine;
- (c) Change only those emission-related settings that are permitted by the manufacturer; and
- (d) Meet the requirements of 40 CFR 1068, as applicable.
- (e) Use diesel fuel that meets the requirements of 40 CFR 1090.305.

(Ref.: 40 CFR 60.4205(c), 60.4206, 60.4207(b), 60.4211(a) and (c), Table 4; Subpart IIII)

3.23 For Emission Points AA-010 and AA-011, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited. If an engine is not operated according to the requirements of (a) – (c) in this permit condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all the requirements for non-emergency engines.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of an emergency engine beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this permit condition counts as part of the 100 hours per calendar year allowed by this paragraph (b).
- (c) The 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 40 CFR 60.4211(f)(3)(i) of Subpart IIII and 40 CFR 60.4243(d)(3)(i) of Subpart JJJJ, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f), Subpart IIII; 40 CFR 60.4243(d); Subpart JJJJ)

- 3.24 For Emission Points AA-010 and AA-011, the permittee is subject to limited requirements of 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and of 40 CFR Part 63, Subpart A – General Provisions.

The only applicable requirement for Emission Points AA-010 and AA-011 is the initial notification requirements of Condition 6.15.

(Ref.: 63.6585, 63.6665, 63.6590(a)(2)(i) and (b)(1)(i); Subpart ZZZZ)

#### SECTION 4. WORK PRACTICES

| Emission Point              | Applicable Requirement                                           | Condition Number(s) | Work Practice                               |
|-----------------------------|------------------------------------------------------------------|---------------------|---------------------------------------------|
| AA-002 (SB)<br>AA-007 (BO1) | 40 CFR 63.7500(c), 63.7515(d), and 63.7540(a)(12); Subpart DDDDD | 4.1                 | Conduct routine tune-ups                    |
| AA-003<br>AA-005            | 40 CFR 63.2241(a) and Table 3 (row 6); Subpart DDDD              | 4.2                 | Follow safety-related shutdown requirements |
| AA-008                      | 40 CFR 63.2241(a) and Table 3 (row 5); Subpart DDDD              | 4.3                 | Use non-HAP coatings                        |

4.1 For Emission Points AA-002 (SB) and AA-007 (BO1), the permittee shall conduct a tune-up of each boiler no more than 61 months after initial startup and every 5 years thereafter (not to exceed 61 months after the previous tune-up). Each tune-up shall be performed in accordance with the following specifications:

- (a) Inspect the burner (as applicable) and clean or replace any components of the burner as necessary. The permittee may delay the burner inspection specified until the next scheduled or unscheduled unit shutdown. If the boiler produces electricity for sale, the permittee may delay the burner inspection until the first outage not to exceed seventy-two 72 months from the previous inspection.
- (b) At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspection, inspections are required only during planned entries into the storage vessel or process equipment.
- (c) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications (if available).
- (d) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. If the boiler produces electricity for sale, the permittee may delay the burner inspection until the first outage not to exceed 36 months from the previous inspection.
- (e) Optimize the total emission of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxides (NO<sub>x</sub>) requirement to which the unit is subject.
- (f) Measure the concentrations in the effluent stream of CO in parts per million (by volume) and oxygen in volume percent before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis

before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

- (g) Additionally, the permittee shall maintain the following information for each boiler tune-up conducted:
- (1) The concentrations of CO in the effluent stream in parts per million by volume and oxygen in volume percent, measured at high fire or the typical operating load, before and after the tune-up of a boiler;
  - (2) A description of any corrective actions taken as a part of the tune-up; and
  - (3) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the boiler was physically and legally capable of using more than 1 type of fuel during that period.

If a boiler is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 calendar days of start-up.

(Ref.: 40 CFR 63.7500(c), 63.7515(d), and 63.7540(a)(12); Subpart DDDDD)

- 4.2 For Emission Points AA-003 and AA-005, the permittee shall follow documented site-specific procedures such as 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) ceases and that material is removed from the dryers and the press as expeditiously as possible given the system design to reduce air emissions.

(Ref.: 40 CFR 63.2241(a) and Table 3 (row 6); Subpart DDDD)

- 4.3 For Emission Point AA-008, the permittee shall use non-HAP coatings, as defined in 40 CFR 63.2292.

(Ref.: 40 CFR 63.2241(a) and Table 3 (row 5); Subpart DDDD)

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

| Emission Point                       | Applicable Requirement                                                               | Condition Number(s) | Pollutant/Parameter                                                             | Monitoring/Recordkeeping Requirement                                                                                                                     |
|--------------------------------------|--------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| AA-100<br>(Facility-Wide)            | 11 Miss. Admin. Code Pt. 2, R. 2.9.                                                  | 5.1                 | Recordkeeping                                                                   | Maintain records for a minimum of 5 years.                                                                                                               |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                            | 5.2                 | PM/PM <sub>10</sub> /PM <sub>2.5</sub><br>NO <sub>x</sub><br>CO<br>VOCs         | Calculate the total emission of each pollutant (monthly and rolling 12-month totals)                                                                     |
| AA-002                               | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                            | 5.3                 | Fuel                                                                            | Maintain records of the types of fuels combusted                                                                                                         |
|                                      | 40 CFR 60.45b(k), 60.47b(f), and 60.49b(r)(1); Subpart Db                            | 5.4                 | SO <sub>2</sub>                                                                 | Maintain records demonstrating the use of sulfur-compliant fuels                                                                                         |
|                                      | 40 CFR 60.46b(b) and (d); Subpart Db                                                 | 5.5                 | PM<br>Opacity                                                                   | Conduct initial performance testing                                                                                                                      |
|                                      | 40 CFR 60.48b(a), (e)(1), and 60.49b(f); Subpart Db                                  | 5.6                 | Opacity                                                                         | Install, calibrate, maintain, and operate a continuous opacity monitoring systems (COMS)                                                                 |
|                                      | 40 CFR 60.49b(d)(1); Subpart Db                                                      | 5.7                 | PM                                                                              | Maintain fuel records and calculate annual capacity factors                                                                                              |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                            | 5.8                 | Exhaust Gas Temperature<br>AND<br>Injection Nozzle Flow Rate OR Supply Pressure | Continuously monitor the exhaust gas temperature for the SNCR<br><br>Continuously monitor the injection nozzle flow rate or supply pressure for the SNCR |
| AA-002<br>(SB)                       | 40 CFR 63.7555(a)(1); Subpart DDDDD<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.9                 | Operating Conditions<br><br>Fuels                                               | Maintain fuel records and calculate annual capacity factors                                                                                              |
| AA-002<br>AA-003<br>AA-004<br>AA-005 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                            | 5.10                | PM/PM <sub>10</sub> /PM <sub>2.5</sub><br>NO <sub>x</sub><br>CO<br>VOCs         | Initial performance test<br><br>Establish operating parameters                                                                                           |

| Emission Point                       | Applicable Requirement                                                                                                                          | Condition Number(s) | Pollutant/Parameter                                                                   | Monitoring/Recordkeeping Requirement                                                                                               |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| AA-002<br>AA-003<br>AA-004<br>AA-005 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                                                                                       | 5.11                | PM/PM <sub>10</sub> /PM <sub>2.5</sub><br><br>NO <sub>x</sub><br><br>VOCs<br><br>HAPs | Perform an inspection on each control device monthly<br><br>Maintain documentation on periods of non-operation for control devices |
| AA-002<br>AA-003                     | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                                                                                       | 5.12                | Secondary Voltage                                                                     | Continuously monitor the secondary voltage on each ESP                                                                             |
| AA-003<br>AA-005<br>AA-008           | 40 CFR 63.2260(a), 63.2261(a), 63.2262(k – l); Subpart DDDD                                                                                     | 5.13                | HAP<br><br>Firebox Temperature                                                        | Conduct initial performance testing<br><br>Determine a minimum operating temperature for each RTO / RCO                            |
| AA-003<br>AA-005                     | 40 CFR 63.2269(a) and (b); Subpart DDDD                                                                                                         | 5.14                | Firebox Temperature                                                                   | Install a CPMS for temperature monitoring in each RTO                                                                              |
| AA-003<br>AA-005                     | 40 CFR 63.2270(a)–(d), (f), 63.2271(a), and Table 7 (row 1); Subpart DDDD                                                                       | 5.15                | Firebox Temperature                                                                   | Continuous compliance requirements                                                                                                 |
| AA-003<br>AA-005<br>AA-008           | 40 CFR 63.2271(a), 63.2282(a), (b), (f), and Table 8 (rows 5 and 6); Subpart DDDD                                                               | 5.16                | HAP                                                                                   | Recordkeeping requirements                                                                                                         |
| AA-004                               | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                                                                                       | 5.17                | Differential Pressure Drop                                                            | Continuously monitor the pressure drop across each baghouse<br><br>Continuously monitor for broken filter bags                     |
| AA-005                               | 40 CFR 63.2267, 63.2260(a), Table 4 (row 9); Subpart DDDD                                                                                       | 5.18                | HAP                                                                                   | Use a wood products enclosure                                                                                                      |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                                                                                       | 5.19                | Opacity                                                                               | Conduct a weekly visible emission observation / evaluation                                                                         |
| AA-010<br>AA-011                     | 40 CFR 60.4209(a), 60.4214(b); Subpart IIII<br><br>40 CFR 60.4237(a), 60.4245(b); Subpart JJJJ<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.20                | Hours of Operation                                                                    | Install a non-resettable hour meter and keep records of the hours of operation                                                     |
|                                      | 40 CFR 60.4114(a)(2); Subpart IIII                                                                                                              | 5.21                | Recordkeeping                                                                         | Keep records of maintenance and documentation that the engine is                                                                   |

| Emission Point | Applicable Requirement                 | Condition Number(s) | Pollutant/Parameter | Monitoring/Recordkeeping Requirement           |
|----------------|----------------------------------------|---------------------|---------------------|------------------------------------------------|
|                | 40 CFR 60.4245(a)(1)–(3); Subpart JJJJ |                     |                     | certified to the applicable emission standards |

- 5.1 The permittee shall retain all required records, monitoring data, supporting information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to DEQ as required by Applicable Rules and Regulations or this permit upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9.)

- 5.2 For Emission Point AA-100 (Facility-Wide), the permittee shall calculate and record the total respective emission of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and VOCs in tons from all applicable sources both on a monthly basis and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to validate calculated emissions (operational data, applicable emission factors, engineering judgement determinations, stack testing results, etc.).

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

- 5.3 For Emission Point AA-002, the permittee shall keep records of the types of fuels (bark, natural gas, wood residuals, or on-site generated process materials) that are combusted in the burners.

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

- 5.4 For Emission Point AA-002, to demonstrate that the fines/furnace burner system combusts only very low sulfur oil, natural gas, wood, a mixture of these fuels, or any of these fuels (or a mixture of these fuels) in combination with other fuels that are known to contain an insignificant amount of sulfur, the permittee shall obtain and maintain at the facility fuel receipts (such as a current, valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the oil meets the definition of distillate oil and gaseous fuel meets the definition of natural gas, as defined in 40 CFR 60.41b, and the applicable sulfur limit.

The permittee is not subject to the SO<sub>2</sub> emission monitoring requirements under 40 CFR 60.47b(a) if fuel records are maintained in accordance with this permit condition.

(Ref.: 40 CFR 60.45b(k), 60.47b(f), and 60.49b(r)(1); Subpart Db)

- 5.5 For Emission Point AA-002, to determine compliance with the PM and opacity limitations in Condition 3.10, the permittee shall conduct an initial performance test as required under 40 CFR 60.8, using the procedures and reference methods in 40 CFR 60.46b(d). The performance test shall be conducted within 60 days after achieving the maximum production rate at which the fines/furnace burner system will be operated, but not later than

180 days after initial startup. Subsequent testing shall be conducted biennially thereafter; no later than twenty-five (25) months following the previously completed performance test.

(Ref.: 40 CFR 60.46b(b) and (d); Subpart Db and 11 Miss. Admin Code Pt. 2, R. 2.2.B(11).)

- 5.6 For Emission Point AA-002, the permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring systems (COMS) for measuring the opacity of emissions discharged to the atmosphere and record the output of the system. The procedures in 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the COMS. The span value for the COMS shall be between 60 and 80 percent.

(Ref.: 40 CFR 60.48b(a), (e)(1), and 60.49b(f); Subpart Db)

- 5.7 For Emission Point AA-002, the permittee shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

(Ref.: 40 CFR 60.49b(d)(1); Subpart Db)

- 5.8 For Emission Point AA-002, the permittee shall continuously monitor and record the exhaust gas temperature for the SNCR (in degrees Fahrenheit) and either the injection nozzle flow rate (in gallons per minute) or the injection nozzle supply pressure (in pounds per square inch). All parameters shall be monitored based on a 3-hour block average.

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

- 5.9 For Emission Point AA-002 (SB), the permittee shall record and maintain records of the hours the dust burner operated outside of 'normal conditions'. For the purpose of the permit 'normal conditions' is defined as the exhaust from the dust burner being routed to either the furnace system (AA-002) or the drum dryers (AA-003).

Additionally, the permittee shall record and maintain records of the amounts of each fuel combusted when the dust burner operated outside of 'normal conditions' (e.g. cold startups). The permittee shall calculate the annual capacity factor for all fuels combusted during periods of operation outside of 'normal conditions' for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

(Ref.: 40 CFR 63.7555(a)(3); Subpart DDDDD and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.10 For Emission Points AA-002, AA-003, AA-004, and AA-005, the permittee shall conduct initial performance testing no later than 180 days after initial startup in accordance with the following requirements:

- (a) For Emission Points AA-002, AA-003, and AA-005: The permittee shall evaluate the respective emission of PM (filterable), PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), CO, NO<sub>x</sub>, and VOCs. Subsequent testing shall be

conducted biennially thereafter; no later than twenty-five (25) months following the previously completed performance test.

- (b) For Emission Point AA-004: The permittee shall evaluate the respective emission of PM (filterable), PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), and VOCs. Subsequent testing shall be conducted once every five (5) years; no later than sixty-one (61) months following the previously completed performance test.
- (c) All performance testing shall be conducted in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (d) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (e) As applicable, the permittee shall conduct a performance stack test at representative operating conditions. Operations during periods of start-up, shutdown, or nonoperation do not constitute "representative operating conditions". The permittee may not conduct performance tests during periods of malfunction. The permittee shall monitor and record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation.
- (f) The MDEQ may require the permittee to conduct a subsequent performance stack test if the heat input rate of a unit increases by more than ten percent (10%) of the average rate established during the completed test; and
- (g) As applicable, the permittee shall monitor and record the usage of each fuel combusted during each test run.
- (h) The permittee shall establish a secondary voltage range (in volts) for each ESP during each PM-related performance test by continuously monitoring and recording the secondary voltage during each test run.
- (i) The permittee shall establish a minimum combustion chamber temperature (in degrees Fahrenheit) for each RTO / RCO during each VOC-related performance test by continuously monitoring and recording the combustion temperature during each test run.
- (j) For the SNCR, during each NO<sub>x</sub>-related performance test, the permittee shall establish: (1) an exhaust gas temperature range (in degrees Fahrenheit) and (2) a minimum injection nozzle flow rate (in gallons per minute) or a minimum injection nozzle supply pressure (in pounds per square inch). The permittee shall continuously monitor and record each parameter (as applicable) during each test run.

- (k) The permittee shall establish the differential pressure drop (in inches of water) across each baghouse during each PM-related performance test by continuously monitoring and recording the pressure drop during each test run.

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

- 5.11 For Emission Points AA-002, AA-003, AA-004 and AA-005, the permittee shall demonstrate compliance with Condition 3.5 by performing an inspection that evaluates the performance capability of each control device on a monthly basis.

If a problem is noted during an inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the best extent practicable) sufficient components as is necessary to repair a control device.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem that is experienced, and any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed. Additionally, the permittee shall monitor and record each period of time (including the date and duration) in which a control device is non-operational on a monthly basis.

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

- 5.12 For Emission Points AA-002 and AA-003, the permittee shall continuously monitor and record the secondary voltage (in volts) for each ESP based on a 3-hour block average.

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

- 5.13 For Emission Points AA-003 and AA-005, the permittee shall conduct an initial performance test to demonstrate compliance with the HAP destruction efficiency standard specified in Condition 3.16 and establish the site-specific operating requirement in Condition 3.17. The performance test shall be conducted no later than 180 calendar days after initial startup and subsequent performance testing shall be conducted once every five (5) years; no later than sixty-one (61) months following the previous completed performance test. All testing shall be conducted according to the following requirements:

- (a) The performance test shall be conducted using the test methods in Table 4 of Subpart DDDD.
- (b) The permittee must conduct each performance test based on representative performance (i.e., performance based on representative operating conditions as defined in 40 CFR 63.2292) of the unit for the period being tested. Representative conditions exclude periods of startup and shutdown. Performance tests may not be conducted during periods of malfunction. The representative operating conditions must be described in the performance test report for the process and control systems with an explanation of why they are representative. The process information that is necessary to document operating conditions during the test must be recorded and include an explanation to support that such conditions are representative. Upon request, the permittee shall make available to the MDEQ such records as may be necessary to determine the conditions of performance tests.

- (c) The performance test shall consist of three separate test runs. Each test run must last at least 1 hour.
- (d) Sampling sites must be located at the inlet and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere.
- (e) All nondetect data (as defined in 40 CFR 63.2292) must be treated as one-half of the method detection limit when determining total HAP as total hydrocarbon (THC) emission rates.
- (f) To demonstrate compliance with the percent reduction compliance option, the permittee shall calculate the percent reduction of emissions of total HAP as THC using the following equation:

$$PR = CE \times \frac{ER_{in} - ER_{out}}{ER_{in}} (100)$$

Where:

PR = percent reduction, percent;

CE = capture efficiency, percent;

ER<sub>in</sub> = emission rate of total HAP as THC in the inlet vent stream of the control device, pounds per hour;

ER<sub>out</sub> = emission rate of total HAP as THC in the outlet vent stream of the control device, pounds per hour.

- (g) The permittee shall collect operating parameter monitoring system data at least every 15 minutes during the entire performance test and establish the thermal oxidizer operating parameters according to the following requirements:
  - (1) During the performance test, the permittee must continuously monitor the firebox temperature during each of the required 1-hour test runs.
  - (2) For regenerative thermal oxidizers, the permittee may measure the temperature in multiple locations (e.g., one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature.
  - (3) The minimum firebox temperature must then be established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs.
  - (4) Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.
- (h) The permittee shall collect operating parameter monitoring system data at least every 15 minutes during the entire performance test and establish the catalytic oxidizer operating parameters according to the following requirements:

- (1) During the performance test, the permittee must continuously monitor the temperature at the inlet to each catalyst bed or the temperature in the combustion chamber during each of the required 1-hour test runs.
- (2) For regenerative catalytic oxidizers, the permittee must calculate the average of the temperature measurements from each catalyst bed inlet or within the combustion chamber prior to reducing the temperature data to 15-minut averages for purposes of establishing the minimum catalytic oxidizer temperature.
- (3) The minimum catalytic oxidizer temperature must then be established as the average of the three minimum 15-minute temperatures monitored during the three test runs.
- (4) Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

(Ref.: 40 CFR 63.2260(a), 63.2261(a), 63.2262(k – l); Subpart DDDD)

5.14 For Emission Points AA-003 and AA-005, the permittee shall install, operate, and maintain a continuous parameter monitoring system (CPMS) for the monitoring of the firebox temperature in each RTO / RCO, according to the following requirements:

- (a) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
- (b) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) Record the results of each inspection, calibration, and validation check.
- (d) Locate the temperature sensor in a position that provides a representative temperature.
- (e) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.
- (f) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.
- (g) Validate the temperature sensor's reading at least semiannually using following the requirements:
  - (1) Compare measured readings to a National Institute of Standards and Technology (NIST) traceable temperature measurement device or simulate a typical operating temperature using a NIST traceable temperature simulation device. When the temperature measurement device method is used, the sensor of the NIST traceable calibrated device must be placed as close as practicable to the process sensor, and both devices must be subjected to the same environmental conditions. The accuracy of the temperature measured must be 2.5 percent of the temperature measured by the NIST traceable device or 5 °F, whichever is greater.

- (2) Follow applicable procedures in the thermocouple manufacturer owner's manual.
- (3) Request thermocouple manufacturer to certify or re-certify electromotive force (electrical properties) of the thermocouple.
- (4) Replace thermocouple with a new certified thermocouple in lieu of validation.
- (5) Permanently install a redundant temperature sensor as close as practicable to the process temperature sensor. The sensors must yield a reading within 30 °F of each other for thermal oxidizers and catalytic oxidizers.
- (h) Conduct validation checks using the procedures in paragraph (g) any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- (i) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

(Ref.: 40 CFR 63.2269(a) and (b); Subpart DDDD)

5.15 For Emission Points AA-003 and AA-005, to demonstrate continuous compliance with Condition 3.16, the permittee shall monitor the firebox temperature in each RTO / RCO using the CPMS installed in accordance with Condition 5.11 and collect, record, and reduce the temperature monitoring data according to the following requirements:

- (a) Except for, as appropriate, monitor 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 at all times that the process unit is operating. 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. The permittee must use all the data collected during all other periods 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 calculations 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 or data recorded during periods of safety-related shutdown 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 temperature readings, calculated after every 3 hours of operation as the average of the evenly

spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (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 (i.e., not from periods described in paragraphs (a) and (b)).

(Ref.: 40 CFR 63.2270(a)–(d), (f), 63.2271(a), and Table 7 (row 1); Subpart DDDD)

5.16 For Emission Points AA-003, AA-005, and AA-008, the permittee shall maintain documentation on the following information:

- (a) A copy of each notification and report submitted to comply with Subpart DDDD (including all supporting documentation).
- (b) Records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions, in accordance with 40 CFR 63.2282(a)(2)(i) – (iv), Subpart DDDD.
- (c) The results for all performance tests and continuous monitoring system (CMS) performance evaluations.
- (d) Records that demonstrate only non-HAP coatings are being used in all Group 1 miscellaneous coating operations.
- (e) Records that demonstrate the requirements for a safety-related shutdown of a dryer, press and/or a RTO / RCO are being followed.
- (f) The written CMS quality control procedures and program of corrective action (as specified in 40 CFR 63.8(d)(2)) for the life of the process unit (or until the process unit is no longer subject to Subpart DDDD).

If the performance evaluation plan is revised, the permittee shall keep previous (i.e. superseded) versions of the performance evaluation plan on record to be made available for inspection for a period of five (5) years after each revision to the plan.

(Ref.: 40 CFR 63.2271(a), 63.2282(a), (b), (f), and Table 8 (rows 5 and 6); Subpart DDDD)

5.17 For Emission Point AA-004, the permittee shall continuously monitor and record the differential pressure drop (in inches of water) for each baghouse based on a 3-hour block average.

In addition, the permittee shall monitor continuously for broken filter bags. The permittee shall maintain all documentation of broken filter bag alarms and corrective actions onsite.

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

5.18 For Emission Point AA-005, the permittee shall use a wood products enclosure for the press. The wood products enclosure shall be a permanently installed containment designed to meet the following physical design criteria:

- (a) Any natural draft opening shall be at least four equivalent opening diameters from each HAP-emitting point, except for where board enters and exits the enclosure, unless otherwise specified by the MDEQ.
- (b) The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (c) The average facial velocity of air through all natural draft openings shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all natural draft openings shall be into the enclosure.
- (d) All access doors and windows whose areas are not included in item (b) of this definition and are not included in the calculation of facial velocity in item (c) of this definition shall be closed during routine operation of the process.
- (e) The enclosure is designed and maintained to capture all emissions for discharge through a control device.

(Ref.: 40 CFR 63.2267, 63.2260(a), Table 4 (row 9); Subpart DDDD)

- 5.19 For Emission Points AA-005, the permittee shall perform a visible emission observation in accordance with EPA Test Method 22 on the exhaust of each source on a weekly basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation period, the permittee shall then immediately take action to minimize emissions.

The permittee shall maintain all documentation and information specified by Method 22 , any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted.

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

- 5.20 For Emission Points AA-010 and AA-011, the permittee shall install a non-resettable hour meter and record the hours of operation of each engine on a monthly basis for both emergency and non-emergency service. The permittee must document what classified the operation as either emergency or non-emergency.

(Ref.: 40 CFR 60.4209(a), 60.4214(b); Subpart IIII; 40 CFR 60.4237(a), 60.4245(b); Subpart JJJJ; and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.21 For Emission Points AA-010 and AA-011, the permittee shall keep records of the following information:

- (a) All notifications submitted to comply with Subpart IIII and Subpart JJJJ;
- (b) Maintenance conducted on the engine.
- (c) Documentation from the manufacturer that the engine is certified to meet the applicable emission standards and information required in 40 CFR Parts 1048, 1054, and 1060, as applicable.

(Ref.: 40 CFR 60.4114(a)(2); Subpart IIII and 40 CFR 60.4245(a)(1)–(3); Subpart JJJJ)

## SECTION 6. REPORTING REQUIREMENTS

| Emission Point                       | Applicable Requirement                               | Condition Number(s) | Reporting Requirement                                                           |
|--------------------------------------|------------------------------------------------------|---------------------|---------------------------------------------------------------------------------|
| AA-100<br>(Facility-Wide)            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).            | 6.1(a)              | Report deviations within five (5) working days                                  |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).            | 6.1(b)              | Semiannual reporting                                                            |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).            | 6.1(c)              | Certification by responsible official                                           |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).             | 6.1(d)              | Notification of beginning actual construction within 15 days                    |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).             | 6.1(e)              | Notification when construction does not begin or is suspended                   |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).     | 6.1(f)              | Certification of completion of construction prior to operation                  |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).             | 6.1(g)              | Notification of changes in construction                                         |
|                                      | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).            | 6.2                 | Submit a semiannual monitoring report                                           |
| AA-002                               | 40 CFR 60.49b(r)(1) and (w); Subpart Db              | 6.3                 | Submit semiannual reports certifying the use of sulfur-compliant fuels          |
|                                      | 40 CFR 60.49b(a)(1)–(3); Subpart Db                  | 6.4                 | Submit notification of initial startup                                          |
|                                      | 40 CFR 60.49b(b); Subpart Db                         | 6.5                 | Submit initial performance test data and the performance evaluation of the COMS |
|                                      | 40 CFR 60.49b(h)(1) and (3), (v) and (w); Subpart Db | 6.6                 | Submit excess emissions reports for opacity                                     |
| AA-002<br>AA-003<br>AA-004<br>AA-005 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).            | 6.7                 | Stack test reporting requirements                                               |
| AA-002<br>(SB)<br>AA-007<br>(BO1)    | 40 CFR 63.7550(b), (c)(1); Subpart DDDDD             | 6.8                 | Submit 5-year compliance report                                                 |

| Emission Point             | Applicable Requirement                                                      | Condition Number(s) | Reporting Requirement                                                                                                                      |
|----------------------------|-----------------------------------------------------------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| AA-003<br>AA-005<br>AA-008 | 40 CFR 63.2280(b); Subpart DDDD                                             | 6.9                 | Submit an initial notification                                                                                                             |
| AA-003<br>AA-005           | 40 CFR 63.2280(c); Subpart DDDD<br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11) | 6.10                | Submit notification of intent for performance testing                                                                                      |
|                            | 40 CFR 63.2281(a), (h) – (l), and Table 9; Subpart DDDD                     | 6.11                | Submit performance test results                                                                                                            |
|                            | 40 CFR 63.2281(b) – (c); Subpart DDDD                                       | 6.12                | Submit semi-annual compliance report                                                                                                       |
| AA-003<br>AA-005           | 40 CFR 63.2281(e); Subpart DDDD                                             | 6.13                | Submit semi-annual deviation reports                                                                                                       |
| AA-005                     | 40 CFR 63.2267 and 63.2280(d); Subpart DDDD                                 | 6.14                | Submit documentation that the wood products enclosure meets the press enclosure design criteria or capture efficiency verification results |
| AA-010<br>AA-011           | 40 CFR 63.6590(b)(1)(i), 63.6645(a)(3), (f); Subpart ZZZZ                   | 6.15                | Submit an initial notification no later than 120 days after start-up                                                                       |
|                            | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).                                   | 6.16                | Submit an annual summary on hours of operation (emergency and non-emergency)                                                               |

## 6.1 General Reporting Requirements:

- (a) 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. 2.2.B(11).)
- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> 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. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.

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

- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating 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. 2.2.B(11).)

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

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

- (e) The permittee must notify DEQ 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).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, 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) and (3).)

- (g) 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).)

6.2 For Emission Point AA-100 (Facility-Wide), the permittee shall submit semi-annual reports, in accordance with Condition 6.1(b), that contain the following information:

- (a) The total emission of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and VOCs from all applicable sources in tons based on both a monthly basis and a rolling 12-month total basis.
- (b) A summary of any maintenance action(s) performed on each control device and any periods of time (including date and duration) in which a control device was non-operational.
- (c) A summary for each parametric continuous monitoring and recording system (CMRS) that provides the following information:

- (1) Operation Outside Established Range – the specific emission point / control equipment, the temperature, secondary voltage, or pressure drop established during the performance test, the date, the beginning and ending times, the cause(s) for each excursion; and any corrective action taken as a result of the excursion.
- (2) CMS downtime – the specific emission point / control equipment, the date, the beginning and ending times, the cause(s) for each downtime event, and any corrective action taken as a result of a downtime event.

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

- 6.3 For Emission Point AA-002, the permittee shall submit semiannual reports, in accordance with Condition 6.1(b), certifying that only very low sulfur oil, meeting the definition in 40 CFR 60.41b, natural gas, wood, and/or other fuels that are known to contain insignificant amounts of sulfur were combusted in the burner system during the reporting period.

(Ref.: 40 CFR 60.49b(r)(1) and (w); Subpart Db)

- 6.4 For Emission Point AA-002, the permittee shall submit notification of the date of initial startup, as provided by 40 CFR 60.7. This notification shall include:

- (a) The design heat input capacity of the fines/furnace burner system and identification of the fuels to be combusted in the fines/furnace burner system;
- (b) A copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.44b(d); and
- (c) The annual capacity factor at which the permittee anticipates operating the fines/furnace burner system based on all fuels fired and based on each individual fuel fired.

(Ref.: 40 CFR 60.49b(a)(1)–(3); Subpart Db)

- 6.5 For Emission Point AA-002, the permittee shall submit to the MDEQ the performance test data from the initial performance test required by Condition 5.5 and the performance evaluation of the COMS required by 40 CFR 60.13(c).

(Ref.: 40 CFR 60.49b(b); Subpart Db)

- 6.6 For Emission Point AA-002, the permittee shall submit semiannual excess emission reports, in accordance with Condition 6.1(b), for any excess emissions that occurred during the reporting period. In lieu of submitting the written reports, the permittee may submit electronic quarterly reports no later than 30 days after the end of the calendar quarter per 40 CFR 60.49b(v). Excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards in Condition 3.10.

(Ref.: 40 CFR 60.49b(h)(1) and (3), (v), and (w); Subpart Db)

6.7 For Emission Points AA-002, AA-003, AA-004, and AA-005, the permittee shall submit the following notifications, information, and/or reports for the performance test required in Condition 5.10:

- (a) A written test protocol shall be submitted at least 30 days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ. If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.
- (b) A notification about the testing event shall be submitted ten 10 days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s).
- (c) The test results from a performance test shall be submitted to the MDEQ no later than 60 days after completing the actual test. Additionally, the permittee shall submit a summary of the results of any required periodic and/or parametric monitoring recorded during a performance test.

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

6.8 For Emission Points AA-002 (SB) and AA-007 (BO1), upon startup, the permittee shall submit a compliance report that covers the period of 5 years after startup and ends on December 31. The first compliance report must be postmarked or delivered no later than January 31<sup>st</sup>. Thereafter, the permittee shall submit subsequent 5-year compliance reports no later than January 31<sup>st</sup> of each calendar following the previous 5-year period. The compliance report shall contain the following information:

- (a) Company and Facility name and address.
- (b) Process unit information, emissions limitations, and operating parameter limitations (as applicable).
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) For Emission Point AA-002 (SB), the total operating time during the reporting period.
- (e) The date of the most recent tune-up.
- (f) The date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
- (g) 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.

(Ref.: 40 CFR 63.7550(b), (c)(1); Subpart DDDDD)

6.9 For Emission Points AA-003, AA-005, and AA-008, the permittee shall submit an Initial Notification no later than 120 calendar days after initial startup via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) website [<https://cdx.epa.gov/>]. Each electronic submittal shall be completed in accordance with 40 CFR 63.2281(h), (k), and (l) of Subpart DDDD.

(Ref.: 40 CFR 63.2280(b); Subpart DDDD)

- 6.10 For Emission Points AA-003 and AA-005, the permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1).

The permittee shall notify the MDEQ in writing at least ten 10 days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.

(Ref.: 40 CFR 63.2280(c); Subpart DDDD and 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 6.11 For Emission Points AA-003 and AA-005, the permittee shall submit the results of any conducted performance test to the MDEQ no later than 60 days after completing the testing event.

Additionally, the permittee shall submit any performance test report and/or CMS performance evaluation required by Subpart DDDD via CEDRI in accordance with 40 CFR 63.2281(h) – (l) of Subpart DDDD.

(Ref.: 40 CFR 63.2281(a), (h) – (l), and Table 9; Subpart DDDD)

- 6.12 For Emission Points AA-003 and AA-005, upon startup, the permittee shall submit a compliance report that covers the period of at least 6 months (but does not exceed 12 months) and ends on either June 30 or December 31. The first compliance report must be postmarked or delivered no later than July 31st (for a compliance period ending on June 30th) or January 31st (for a compliance period ending December 31st). Thereafter, the permittee shall submit subsequent semi-annual compliance reports no later than January 31st and July 31st of each calendar year for the previous six-month period. The permittee shall submit the compliance report via CEDRI in accordance with 40 CFR 63.2281(h) – (l) of Subpart DDDD.

Any required compliance report shall contain the following information:

- (a) The 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 content of the report;
- (c) A date for the specified report and the beginning / ending dates of the reporting period;
- (d) If the shutdown work practice in Condition 4.2 is used for more than a total of 100 hours during the semiannual reporting period, include the date, time and duration of each instance when that shutdown work practice was used.

- (e) A description of any maintenance performed on a regenerative thermal oxidizer (RTO) / Regenerative Catalytic Oxidizer (RCO) while the control device was offline and any process units were still in operation, including the following information:
  - (1) The date and time when the RTO / RCO was shut down and restarted.
  - (2) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
- (f) A statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
- (g) A statement that there were no periods during which the CMS was out-of-control (as specified in 40 CFR 63.8(c)(7)) during the reporting period.

(Ref.: 40 CFR 63.2281(b) and (c); Subpart DDDD)

- 6.13 For Emission Points AA-003 and AA-005, the permittee shall submit a semi-annual report that details each deviation from a specified compliance option or operating requirement by the temperature monitoring system (including periods of start-up, shutdown, malfunction, and routine control device maintenance) no later than July 31 and January 31 of each calendar year for the previous six-month period.

Any required report shall contain the following information:

- (a) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
- (b) The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
- (c) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction;
- (d) 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.
- (e) 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.
- (f) 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.
- (g) A brief description of the process units.
- (h) A brief description of the CMS.

- (i) The date of the latest CMS certification or audit.
- (j) A description of any changes in CMS, processes, or controls since the last reporting period.
- (k) For any failure to meet the compliance option in Condition 3.16, provide an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.

(Ref.: 40 CFR 63.2281(e); Subpart DDDD)

- 6.14 For Emission Point AA-005, the permittee must submit documentation that the wood products enclosure meets the press enclosure design criteria in 40 CFR 63.2292 with the Notification of Compliance Status, no later than 60 days after completing the testing required by Condition 5.11. Each electronic submittal shall be completed in accordance with 40 CFR 63.2281(h), (k), and (l) of Subpart DDDD.

(Ref.: 40 CFR 63.2267 and 63.2280(d); Subpart DDDD)

- 6.15 For Emission Points AA-010 and AA-011, the permittee shall submit an Initial Notification no later than 120 calendar days after startup of the engines. The notification shall provide the information in 40 CFR 63.9(b)(2)(i)-(v) and a statement that the permittee's stationary RICE has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE if it has a site rating of more than 500 brake HP located at a major source of HAP emissions).

(Ref.: 40 CFR 63.6590(b)(1)(i), 63.6645(a)(3), (f); Subpart ZZZZ)

- 6.16 For Emission Points AA-010 and AA-011, the permittee shall submit a summary within the semi-annual monitoring report postmarked by January 31 that details the hours of operation for each engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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