STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Georgia Pacific Monticello, LLC
604 N A Sandifer Highway
Monticello, Lawrence County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: November 26, 2018

Modified: August 13, 2019 (minor); August 31, 2021 (minor)

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: October 31, 2023 **Permit No.: 1500-00007**

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SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be

revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (MDEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

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

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

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

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

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

1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order, which shall be issued in accordance with the procedure outlined in Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – "Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act".

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant

for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g. air emission factors); or other approaches such as engineering calculations (e.g. estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

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

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

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

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

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

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

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

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

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

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

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

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

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

1.11 The permittee shall allow the MDEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to perform the following:

(a) Enter upon the permittee's premises where a Title V source is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

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

1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

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

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

(a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

(b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

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

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

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

(a) The changes are not modifications under any provision of Title I of the Act;

(b) The changes do not exceed the emissions allowable under this permit;

(c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:

(1) A brief description of the change(s);

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

(d) The permit shield shall not apply to any Section 502(b)(10) change.

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

1.19 Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – "Regulations for the Prevention of Air Pollution Emergency Episodes" – for the level of emergency declared.

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

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment" – and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act".

"Modification" is defined as [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) Routine maintenance, repair, and replacement;

(b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) Use of an alternative fuel or raw material by a stationary source which:

(1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166).

(e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or

(f) Any change in ownership of the stationary source.

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

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

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

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

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

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvi-cultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up

operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

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

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in Part (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of the emergency the permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, 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 non-compliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than twenty-four (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) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

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

1.27 Regarding compliance testing (if applicable):

(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 POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide (Georgia Pacific Monticello, LLC)
AA-100	The Woodyard Area (including the following equipment): ▪ Log Handling and Storage; ▪ Debarkers, Chippers, and Screens; ▪ Chip, Bark, and Fines Transfer and Storage; ▪ Truck and Rail Receiving; ▪ Wood Handling, including the drop points into the Chip Bins associated with the Kraft Pulp Mill Digester System; ▪ Wood Fuel Processing; ▪ Purchased Chip and Bark Unloading
AA-201	The Kraft Pulp Mill Digester System (including the following equipment): ▪ No. 1 Digester (continuous digester) ▪ No. 2 Digester (continuous digester) ▪ No. 1 Blow Tank; ▪ No. 2 Blow Tank; ▪ Chip Steaming Bins, including the Chip Bins after the chips are dropped into the Bins and the Steaming Vessels (uses fresh steam); ▪ Flash Tanks ***Note:*** *The No. 1 and No. 2 Digesters and the No. 1 and No. 2 Blow Tanks are collected as part of the low-volume, high-concentration (LVHC) non-condensable gas (NCG) system. The No. 2 Flash Tank receives gases from the other flash tanks and then vents to the Flash Evaporators. The Flash Evaporators are collected as part of the LVHC NCG system.*
AA-202(a)	The Kraft Pulp Mill Brown Stock Washer System (including the following equipment used to wash the pulp following the digester system): ▪ Black Liquor Surge Tank ▪ No. 1 Chemi-washer ▪ No. 2 Chemi-washer ▪ No. 1 Weak Black Liquor Storage Tank ▪ No. 2 Weak Black Liquor Storage Tank ▪ No. 1 Refiner Feed Tank ▪ No. 2 Refiner Feed Tank ▪ No. 1 Screen Feed Tank ▪ No. 2 Screen Feed Tank ***Note:*** *Weak Black Liquor Storage Tanks, Refiner Feed Tanks, and Screen Feed Tanks are not considered part of the brownstock washer system as defined in 40 CFR Part 60 – Subpart BBa or 40 CFR Part 63 – Subpart S. The screens and refiners are closed systems that do not emit to atmosphere.*

Emission Point	Description
AA-202(b)	The Kraft Pulp Mill Hi-Density Towers (5)
AA-203	The Kraft Pulp Mill Multiple Effect Evaporator System [including the following equipment used to concentrate the spent cooking liquid (black liquor) that is separated from the pulp]: ▪ Multiple-Effect Evaporators and Hotwell; ▪ Flash Evaporator(s) and Hotwell; ▪ Associated Condensers; ▪ Crystallizer System ***Note**: The Condensers and Multiple Effect Evaporators vent through the Hotwells. The 1st, 2nd, and 3rd Effects of the Flash Evaporators vent to the Turpentine System and the 4th and 5th effects vent to the Hotwell. All of this equipment is either collected directly or indirectly as part of the LVHC NCG System.*
AA-204	The Kraft Pulp Mill Turpentine System (including the following equipment): ▪ The North and South Turpentine Decanters; ▪ The Turpentine Condenser System; ▪ Turpentine Storage Tank ***Note:** The Turpentine Decanters, Condenser System and the Turpentine Storage Tank are collected as part of the LVHC NCG System.*
AA-205	The Tall Oil Recovery System (including the following equipment): ▪ Tall Oil Reactor Tank; ▪ Fiber Filter; ▪ Centrifuge Feed Tank; ▪ Brine Tank; ▪ Tall Oil Black Liquor Tank; ▪ Soap Silos; ▪ Soap Storage Tank ***Note:** Although not required by a MACT or other regulation, the Mill collects gases from the Tall Oil Reactor Tank, Fiber Filter, Centrifuge Feed Tank, and the Brine Tank, then routes them to the Lime Kiln for combustion.*
AA-206	The Kraft Pulping Process Low Volume High Concentration (LVHC) (including the following equipment): ▪ Digester System Vents. This includes the No. 1 and No. 2 Continuous Digesters and the No. 1 and No. 2 Blow Tanks; the No. 2 Flash Tank receives gases from the other flash tanks and then vents to the Flash Evaporators; ▪ Turpentine Recovery System vents. This includes the decanters, condenser system and turpentine storage tank; ▪ Evaporator System vents. This includes the multi-effect evaporators, flash evaporators, associated condenser(s), hotwell(s), and crystallizer system. ▪ Steam Stripper System including the steam stripper, stripper feed tank(s), condenser(s), and heat exchanger(s) ▪ Condenser and methanol storage tank vents associated with the Methanol Rectification System ***Note:** Formerly Emission Point AA-003*

Emission Point	Description
AA-207	The Kraft Pulping Process High Volume Low Concentration (HVLC) System (including the following equipment): ▪ The Screen System. The Screen System consists of equipment used to remove oversized particles from the pulp slurry prior to the papermaking system washed stock storage. ▪ The Pulp Washing System (AA-202(a)) ***Note:*** *Formerly Emission Point AA-207. As noted for AA-202(a), the screen is a closed system that does not emit to atmosphere.*
AA-208	The Kraft Pulping System Process Condensates including the following: ▪ Digester System Condensates (Flash Evaporators) ▪ Turpentine Recovery Condensates ▪ Evaporator System Condensates (Multiple Effect Evaporators) ▪ LVHC Collection System Condensates
AA-301	The Paper Machine Building (including the following equipment): ▪ No. 1 Paper Machine; ▪ No. 2 Paper Machine; ▪ All Paper Machine Chemicals The emissions from Paper Machine Building are exhausted through multiple vents, doors, and windows; some of the chemicals may be stored in other Mill locations prior to being added on the paper machine. ***Note:*** *Formerly Emission Point AA-010*
AA-302	The OCC Plant and DLK Plant with emissions exhausted through multiple vents, doors and windows. ***Note:*** *Formerly Emission Point AA-011.*
AA-401	No. 1 Recovery Furnace [with a maximum heat input capacity of 861.4 MMBTU / hour and equipped with two (2) electrostatic precipitators]. The No. 1 Recovery Furnace can also fire natural gas and rectified methanol as supplemental fuels. The No. 1 and No. 2 Recovery Furnaces (Emission Points AA-401 and AA-402) and the Lime Kiln (Emission Point AA-501) serve as control devices for the LVHC NCGs. ***Note:*** *Formerly Emission Point AA-001*
AA-402	No. 2 Recovery Furnace [with a maximum heat input capacity of 861.4 MMBTU / hour and equipped with two (2) electrostatic precipitators]. The No. 2 Recovery Furnace can also fire natural gas and rectified methanol as supplemental fuels. The No. 1 and No. 2 Recovery Furnaces (Emission Points AA-401 and AA-402) and the Lime Kiln (Emission Point AA-501) serve as control devices for the LVHC NCGs. ***Note:*** *Formerly Emission Point AA-002*
AA-403	The Combination Boiler [with a maximum heat input capacity of 917.4 MMBTU / hour and equipped with one (1) electrostatic precipitator]. This boiler combusts bark, wood, natural gas, WWTS sludge, tire derived fuel, OCC rejects, and plywood residuals in any combination as fuel. ***Note:*** *Formerly Emission Point AA-008*
AA-404	Natural Gas Fired Power Boiler with a maximum heat input capacity of 776 MMBTU / hour. This stack also serves as a bypass for the Combination Boiler stack (Emission Point AA-403) when a trip of the Combination Boiler ESP occurs. When this occurs, solid fuel fed to the Combination Boiler is stopped. ***Note****: Formerly Emission Point AA-004*

Emission Point	Description
AA-405	No. 1 and No. 2 Smelt Dissolving Tanks (each equipped with a scrubber) ***Note:*** *Formerly Emission Point AA-005*
AA-406	No. 3 and No. 4 Smelt Dissolving Tanks (each equipped with a scrubber) ***Note:*** *Formerly Emission Point AA-006.*
AA-407(a)	No. 1 Black Liquor Oxidation Tank ***Note:*** *There is also a No. 2 Black Liquor Oxidation (BLOX) Tank [Emission Point AA-407(b)] that normally vents to a stand-alone cyclone with three foam breakers; this tank is only used for deaeration and compressed air is not injected, as is the case with the No. 1 and No. 3 BLOX Tanks; this was formally used as a BLOX tank, but is now used as a deaeration tank. Furthermore, there is no vent on the No. 2 BLOX Tank.*
AA-407(c)	No. 3 Black Liquor Oxidation Tank *Note: There is also a No. 2 Black Liquor Oxidation (BLOX) Tank that normally vents to a stand-alone cyclone with three foam breakers; this tank is only used for deaeration and compressed air is not injected, as is the case with the Nos. 1 and 3 BLOX Tanks; this was formally used as a BLOX tank, but is now used as a deaeration tank. Furthermore, there is no vent on the No. 2 BLOX Tank.*
AA-410	Black Liquor Super Tank (West)
AA-411	Heavy Black Liquor Tank (East)
AA-412	Heavy Black Liquor Tank (West)
AA-413	Intermediate Black Liquor Tank (West)
AA-414	Intermediate Black Liquor Tank (East)
AA-415	No. 3 Weak Black Liquor Storage Tank
AA-416	No. 4 Weak Black Liquor Storage Tank
AA-501	Lime Kiln [equipped with a venturi scrubber]. The Lime Kiln can fire natural gas and petroleum coke as supplemental fuels. The Lime Kiln and No. 1 and No. 2 Recovery Furnaces (Emission Points AA-401 and AA-402) serve as control devices for the LVHC NCGs. The collected gases from the Tall Oil Recovery System are burned in the Lime Kiln. ***Note:*** *Formerly Emission Point AA-007*
AA-502	No. 1 Lime Slaker Vent
AA-503	No. 2 Lime Slaker Vent
AA-504	No. 1 Precoat Filter
AA-506	No. 2 Precoat Filter
AA-508	No. 1 White Liquor Filter
AA-509	No. 2 White Liquor Filter
AA-510	Truck Lime Loading and Unloading

Emission Point	Description
AA-511	Six (6) Lime Causticizers
AA-513	No. 1 White Liquor Clarifier
AA-514	No. 2 White Liquor Clarifier
AA-516	No. 3 White Liquor Clarifier
AA-519	Pulverized Pet Coke Storage Silo equipped with a baghouse
AA-600	Wastewater Treatment System
AA-701	Mill Roadways—Paved and Unpaved
AA-702	Solvent Usage and Parts Washing – Mill-Wide
AA-703	331 HP Emergency Fire Pump (Diesel Fired Existing Compression Ignition Stationary Reciprocating Internal Combustion Engine)
AA-704	104 HP Emergency Backup Generator (Diesel Fired Existing Compression Ignition Stationary Reciprocating Internal Combustion Engine)
AA-705	86 HP Lime Kiln Auxiliary Drive Engine (Diesel Fired Compression Ignition Stationary Reciprocating Internal Combustion Engine)
AA-706	49 HP Unwashed Mud Tank Agitator (Diesel Fired Compression Ignition Stationary Reciprocating Internal Combustion Engine
AA-707	3.103 MMBTU / Hour Natural Gas Package Boiler (used for heating in Personnel Building)
AA-708	1.703 MMBTU / Hour Natural Gas Package Boiler (used for heating in Administrative Building)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

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

(a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) 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.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	40 CFR Part 63, Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry 40 CFR 63.440(a), Subpart S	3.B.1	HAPs	Applicability
AA-401 AA-402 AA-405 AA-406 AA-501	40 CFR Part 63, Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills 40 CFR 63.860(a), Subpart MM	3.B.2	HAPs (Metals)	Applicability
AA-403 AA-404 AA-707 AA-708	40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63.7500(a)(1), Subpart DDDDD	3.B.3	HAPs	Applicability
AA-703 AA-704 AA-705 AA-706	40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.7500(a)(1), Subpart ZZZZ	3.B.4	HAPs	Applicability
AA-703 AA-705	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200, Subpart IIII	3.B.5	HAPs	Applicability
AA-100	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.6(a)	PM	$E = 4.1(p^{0.67})$
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued November 24, 2009	3.B.6(b)	PM / PM_{10}	Use of a partial enclosure and a PM/PM_{10} emission limit of 0.05 lbs. / hour. The partial enclosure will consist of a four-sided building with a roof, which will serve to minimize fugitive PM/PM_{10} emissions from the drop loading of chips into the chip bins.
AA-201	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.7(a)	TRS	5 ppm as H_2S on a dry gas basis corrected to 10% oxygen, on a 12-hour basis

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-201	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.7(b)	TRS VOCs	All emissions shall be controlled by the LVHC non-condensable gas collection system (Emission Point AA-206)
		3.B.7(c)	Pulp Throughput	Annual average (365-day rolling average) throughput shall be limited to 2,800 air dried tons of virgin pulp per day
AA-202(a)	11 Miss. Admin. Code Pt. 2, R 6.3.A(1).	3.B.8(a)	NSPS – Subpart BBa	The brownstock washer system is exempt in accordance with 40 CFR 60.283a(a)(1)(iv)
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified on December 29, 2003 40 CFR 63.447, Subpart S	3.B.8(b)	HAPs	As an alternative to controlling emissions from the brownstock washer system, the facility shall continue to implement the Clean Condensate Alternative as allowed under 40 CFR 63.447
AA-203	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(d).	3.B.9(a)	TRS	5 ppm as H_2S on a dry gas basis corrected to 10% oxygen, on a 12-hour basis
	40 CFR Part 60, Subpart BB – Standards of Performance for Kraft Pulp Mills 40 CFR 60.283(a)(1), Subpart BB	3.B.9(b)		5 ppm as H_2S on a dry gas basis corrected to 10% oxygen, on a 12-hour basis; **or** These gases must be combusted with other waste gases in an incinerator or other device, or combusted in a lime kiln or recovery furnace subject to a minimum temperature of 650 °C (1200 °F) for at least 0.5 seconds.
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 40 CFR 63.443(a)(1), Subpart S	3.B.9(c)	TRS VOCs HAPs	Emissions shall be controlled by the non-condensable gas collection system and combusted in the Recovery Furnaces (AA-401 and AA-402) or Lime Kiln (AA-501)
AA-204	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 40 CFR 63.443(a)(1), Subpart S	3.B.10	TRS VOCs HAPs	Emissions shall be controlled by the non-condensable gas collection system and combusted in the Recovery Furnaces (AA-401 and AA-402) or Lime Kiln (AA-501)
AA-205	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.11	TRS VOCs	Emissions shall be controlled by a separate non-condensable gas collection system and be combusted in the Lime Kiln (Emission Point AA-501)
AA-206	40 CFR 63.443(d)(4), Subpart S	3.B.12(a)	HAPs	Use a control device to reduce total HAP emissions from each emission system as follows: (1) Reduce total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; **or** (2) A boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts (150 MMBTU-h) by introducing the HAP emission stream with the combustion air.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-206	40 CFR 63.443(c), Subpart S	3.B.12(b)	HAPs	Each equipment system shall be enclosed and vented into a closed-vent system and routed to a qualified control device
	40 CFR 63.443(e), Subpart S	3.B.12(c)		Periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of Conditions 3.B.12 and 3.B.13 provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed one (1) percent for control devices used to reduce the total HAP emissions from the LVHC system
	40 CFR 63.457(d), Subpart S	3.B.12(d)		Each enclosure and closed vent system shall meet the requirements for capturing and transporting vent streams that contain HAP
	40 CFR 63.450, Subpart S	3.B.12(e)		Each bypass line in the closed vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations specified in Conditions 3.B.12 and 3.B.13 [40 CFR 63.443(c) & 63.445(b)], shall comply with the following: (1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; **or** (2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal.
AA-208	40 CFR 63.446(d) and (e), Subpart S	3.B.13(a)	HAPs	One of the combinations from 40 CFR 63.446(c)(1) through (c)(3) for HAP-containing pulping process condensates generated, produced, or associated with the equipment systems as defined in 40 CFR 63.446(b) shall be subject to the requirements of 40 CFR 63.446(d) and (e)
	40 CFR 63.446(d), Subpart S	3.B.13(b)		Pulping process condensates shall be conveyed in a closed collection system that is designed and operated to meet the requirements of 40 CFR 63.450 and 63.443(d)
	40 CFR 63.446(f), Subpart S	3.B.13(c)		HAPs removed from the pulping process condensate stream shall be controlled as specified in 40 CFR 63.443(c) and (d)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-208	40 CFR 63.446(g), Subpart S	3.B.13(d)	HAPs	For each control device used to treat pulping process condensates, excess emissions divided by the total process operating time in a semi-annual reporting period shall not exceed 10%
AA-301	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued July 9, 2003 **(PSD BACT Standard)**	3.B.14	VOCs	The Paper Machines must use clean Mill water, mill supply water, non-direct contact condensates, clean condensates, clean indirectly heated water, and/or white water only
AA-302	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.15	Pulp Throughput	Annual average throughput shall be limited to 1,300 air dried tons of secondary pulp per day (365-day rolling average)
AA-401 AA-402	40 CFR 63.864(k)(2)(i), Subpart MM	3.B.16(a)	Opacity	During times when spent liquor is fed, excess emissions shall not exceed 35% for six (6) percent or more of the operating time within any quarterly period. On and after October 11, 2019, during periods when spent liquor is fed, excess emissions shall not exceed 35% for <u>two (2)</u> percent or more of the operating time within any semi-annual period.
	40 CFR 63.864(k)(1)(i), Subpart MM	3.B.16(b)		Corrective action must be taken when the average of ten consecutive 6-minute average opacity values results in a measurement greater than 20% opacity when spent pulping liquor is being fed. Corrective action can include completion of transient start-up and shutdown conditions as expediently as possible.
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued on July 9, 2003	3.B.16(c)	PM / PM_{10}	3 lbs. / ton of equivalent air-dried kraft pulp, not to exceed: 194.3 lbs. / hour and 851.1 tpy (emissions per furnace, not combined)
	40 CFR 63.862(a)(1)(i)(A), Subpart MM	3.B.16(d)	HAP Metals (as PM)	0.044 gr. / dscf (0.10 g / dscm) corrected to 8% oxygen
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.16(e)	NO_X	200.2 lbs. / hour and 876.6 tpy (emissions per furnace, not combined)
		3.B.16(f)	CO	735.6 lbs. / hour and 3,221.8 tpy (emissions per furnace, not combined)
		3.B.16(g)	SO_2	7.0 lbs. / ton of equivalent air-dried kraft pulp, not to exceed: 408.33 lbs. / hour and 1,788.5 tpy (emissions per furnace, not combined)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-401 AA-402	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(b)(3). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified May 28, 2004	3.B.16(h)	TRS	35 ppm expressed as H_2S on a dry gas basis corrected to 8% oxygen (12-hour basis), not to exceed: 31.5 lbs. / hour and 138.0 tpy (emissions per furnace, not combined)
	40 CFR 63.443(d)(4), Subpart S	3.B.16(i)	HAPs	Route all gases from the Low Volume, High Concentration (LVHC) system to the Recovery Furnaces or the Lime Kiln
AA-403	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 31, 2021	3.B.17(a)	Fuel	The permittee is authorized to burn natural gas, bark and wood residuals, WWTS sludge, OCC rejects, plywood residuals, and TDF (tire derived fuel). TDF is limited to a maximum of 6% (not to exceed 2,146 tons TDF) of the total fuel heat input on an annual basis
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(2).	3.B.17(b)	PM	Fuel burning operations utilizing a mixture of combustibles such as (but not limited to) fossil fuels plus bark, oil plus bark, or spent wood, or WWTS sludge, may be allowed particulate matter emission rates up to 0.30 gr. / dscf
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.17(c)	PM / PM_{10}	0.1 lbs. / MMBTU, not to exceed: 91.7 lbs. / hour and 401.8 tpy
		3.B.17(d)	NO_X	284.4 lbs. / hour and 1,245.6 tpy
		3.B.17(e)	CO	1,247.6 lbs. / hour and 5,464.8 tpy
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified December 29, 2003	3.B.17(f) and (g)	SO_2	4.8 lbs. / MMBTU, not to exceed: 235.50 lbs. / hour and 964.30 tpy
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.17(h)	VOCs	88.2 lbs. / hour and 386.4 TPY
		3.B.17(i)	H_2SO_4	3.3 lbs. / hour and 14.4 tpy
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued July 9, 2003 **(PSD BACT Standards)**	3.B.17(j)	NO_X CO PM TRS H_2SO_4 Pb	(1) The use of low-NO_X burners; (2) The use of an Overfire Air System; (3) The use of Stoker Controls; (4) The use of a multi-clone and electrostatic precipitator; (5) The use of good combustion practices.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-403	40 CFR 63.7485, 63.7499, 63.7500(a)(1), (f), and Tables 2 – 4, Subpart DDDDD	3.B.17(k)	HAPs	Comply with applicable emission limits in 40 CFR 63 Subpart DDDDD Tables 2, 3 and 4
AA-404	11 Miss. Admin. Code Pt. 2, R. 1.3D(1)(b). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.18(a)	PM / PM_{10}	$E = 0.8808(I^{-0.1667})$ when burning fossil fuels, not to exceed: 3.8 lbs. / hour and 16.6 tpy
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 1, 2004	3.B.18(b)	NO_X	0.17 lbs. / MMBTU, not to exceed 577.7 tpy
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.18(c)	CO	30.4 lbs. / hour and 133.3 tpy
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.18(d)	SO_2	4.8 lbs. / MMBTU, not to exceed: 0.46 lbs. / hour and 2.0 tpy
	40 CFR 63.7485, 63.7499, and 63.7500(a)(1), Subpart DDDDD	3.B.18(e)	HAPs	For the purposes of 40 CFR 63 Subpart DDDDD, Emission Point AA-404 is an existing large boiler that is in the "Gas 1" fuel subcategory and has a continuous oxygen trim system. The permittee shall comply with all applicable Work Practice Requirements for such a unit found in Table 3 of Subpart DDDDD.
	40 CFR 63.7500(a)(3), Subpart DDDDD	3.B.18(f)		Operate in a manner to minimize emissions using good air pollution control practices
AA-405 AA-406	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.19(a)	PM	0.2 lbs. / ton of equivalent air-dried kraft pulp, not to exceed: 6.5 lbs. / hour and 28.3 tpy (emissions limit per tank; there are 4 tanks)
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.19(b)	PM_{10}	5.8 lbs. / hour and 25.3 tpy based on a ratio of PM_{10} to PM of 0.895 (emissions limit per tank; there are 4 tanks)
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(1).	3.B.19(c)	SO_2	2000 ppm (volume) for existing process equipment

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-405 AA-406	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.19(d)	SO_2	0.2 lbs. / ton of equivalent air-dried kraft pulp, not to exceed: 6.5 lbs. / hour and 28.3 tpy (emissions limit per tank; there are 4 tanks)
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(g). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued December 29, 2003	3.B.19(e)	TRS	0.032 lbs. / ton of black liquor solids expressed as H_2S on a dry gas basis, not to exceed: 1.17 lbs. / hour and 5.1 tpy (emissions limit per tank; there are 4 tanks)
	40 CFR 63.862(a)(1)(i)(B), Subpart MM	3.B.19(f)	HAP Metals (as PM)	0.2 lbs. / ton (or 0.10 kg / Mg) of black liquor solids fired
AA-405 AA-406 AA-501	40 CFR 63.864(k)(2)(iii), Subpart MM	3.B.20(a)	Metal HAPs	When spent pulping liquor or lime mud (as applicable) is being fed, there shall not be 6 or more parametric monitoring values based on a 3-hour average that are outside of the parameter values established during the initial compliance demonstration required by 40 CFR 63.865(b) and Condition 5.B.1 of this document within any 6-month reporting period with the exception of pressure drop during startup and shutdown. The established parametric ranges may be revised during any subsequent compliance testing.
	40 CFR 63.864(k)(1)(ii), Subpart MM	3.B.20(b)		When spent pulping liquor or lime mud (as applicable) is being fed, corrective action shall be taken when any 3-hour average parameter value is outside the range of values established as specified in Subpart MM, with the exception of pressure drop during startup and shutdown. Corrective action can include completion of transient startup and shutdown conditions as expediently as possible.
	40 CFR 63.864(k)(3), Subpart MM	3.B.20(c)		For purposes of determining the number of non-opacity monitoring exceedances, no more than one (1) exceedance will be attributed in any given 24-hour period.
AA-501	11 Miss. Admin. Code Pt. 2, R. 1.3.F(2)(b). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued January 12, 2001; modified on July 9, 2003 and March 4, 2005	3.B.21(a) and (b)	PM / PM_{10}	1.0 lbs. / ton of equivalent air-dried kraft pulp; and 0.064 gr/dscf corrected to 10% oxygen, not to exceed: 29.9 lbs. / hour and 131.0 tpy
	40 CFR 63.862(a)(1)(i)(C), Subpart MM	3.B.21(c)	HAP Metals (as PM)	0.064 gr. / dscf (0.15 g / dscm) corrected to 10% oxygen

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-500	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003	3.B.21(d)	NO_X	95.6 lbs. / hour and 418.5 tpy
		3.B.21(e)	CO	11.7 lbs./hr and 51.1 TPY
	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005	3.B.21(f)	Sulfuric Acid Mist	2.5 lbs. / hour and 10.8 tpy
	11 Miss. Admin. Code Pt. 2, R.2.2.B(10)., as established in the Permit to Construct issued March 14, 2000 and modified on January 12, 2001 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005	3.B.21(g)	SO_2	50 ppm by volume on a dry basis corrected to 10% oxygen, not to exceed: 23.4 lbs. / hour and 102.5 tpy
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(g). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified March 4, 2005	3.B.21(h)	TRS	20 ppm expressed as H_2S on a dry gas, corrected to 10% O_2 (based on 12-hour average)
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued July 9, 2003 **(PSD BACT Standards)**	3.B.21(i)	VOCs PM NOx SO_2 CO H_2S Sulfuric Acid Mist Pb	BACT has been determined to be the following: (1) The use of a venturi scrubber; and (2) Good combustion control and proper operation of the kiln
	40 CFR 63.443(d)(4)(i), Subpart S (LVHC System Gases) 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 (Tall Oil Recovery System)	3.B.21(j)	LVHC and Tall Oil Recovery System Gases	Route all gases from the Low Volume, High Concentration (LVHC) system gases to the Recovery Furnaces or the Lime Kiln. Route all gases from the Tall Oil Recovery System (Emission Point AA-205) to the Lime Kiln
AA-501	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005	3.B.21(k)	pH SO_2	Evaluate and submit a minimum pH for the caustic scrubber liquid that will apply when burning pet coke The minimum pH value may be revised during any subsequent compliance testing.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-519	11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005	3.B.22(a)	PM / PM_{10}	0.14 lbs. / hour and 0.60 tpy
		3.B.22(b)	Operational Restriction	The permittee shall not operate this emission points without the use of the baghouse.
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1). 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005	3.B.22(c)	PM / PM_{10}	$E = 4.1(p^{0.67})$
	Federally Enforceable PSD Permit to Construct issued on March 4, 2005	3.B.22(d)	Operational Restriction	When pet coke is being stored, handled, and transferred on site, the permittee shall employ appropriate combinations of paving, surface cleaning, and dust suppression to prevent the generation of excessive fugitive dust.
AA-703 AA-704 AA-706	40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6602 and Table 2c, Subpart ZZZZ	3.B.23(a)	HAPs	Maintenance Requirements
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a)	3.B.23(b)	PM	0.6 lbs. / MMBTU
AA-705	40 CFR 63.6585, 63.6590, Subpart ZZZZ	3.B.24(a)	HAPs	Comply with 40 CFR 63 Subpart ZZZZ by complying with applicable requirements of 40 CFR 60 Subpart IIII.
	40 CFR 60.4201(b), Subpart IIII	3.B.24(b)	Operational Restriction	Comply with the emission standards for new CI engines in 40 CFR 4201 for their 2007 year model and later stationary ICE (as applicable)
	40 CFR 60.4206, Subpart IIII	3.B.24(c)	Operational Restriction	Operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4204 and 60.4205 over the entire life of the engine
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.24(d)	PM	0.6 lbs. / MMBTU
AA-707 AA-708	40 CFR 63.7485, 63.7499, 63.7500(a)(1), Subpart DDDDD	3.B.25(a)	HAPs	Units are existing small boilers that are in the "Gas 1" fuel subcategory. The permittee shall comply with all applicable Work Practice Requirements for such a unit found in Table 3 of Subpart DDDDD.
	40 CFR 63.7500(a)(3), Subpart DDDDD	3.B.25(b)		Operate in a manner to minimize emissions using good air pollution control practices.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-707 AA-708	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.25(c)	PM	0.6 lbs. / MMBTU; or as otherwise limited by facility modification restrictions

3.B.1 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with all applicable requirements and limitations found in 40 CFR Part 63, Subpart S – National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Pulp and Paper Industry.

(Ref.: 40 CFR 63.440(a), Subpart S)

3.B.2 For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart MM – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills.

(Ref.: 40 CFR 63.860(a), Subpart MM)

3.B.3 For Emission Points AA-403, AA-404, AA-707, and AA-708, the permittee is subject to and shall comply with all applicable requirements and limitations found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

(Ref.: 40 CFR 63.7500(a)(1), Subpart DDDDD)

3.B.4 For Emission Points AA-703, AA-704, AA-705, and AA-706, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).

(Ref.: 40 CFR 63.6585, 6.6590, Subpart ZZZZ)

3.B.5 For Emission Point AA-703 and AA-705, the permittee is subject to and shall comply with the applicable requirements and limitations found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

(Ref.: 40 CFR 60.4201, Subpart IIII)

3.B.6 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-100

(a) For Emission Point AA-100, the permittee shall not cause or permit the emission from any manufacturing process in any one (1) hour from any point source particulate matter (PM) in total quantities in excess of the amount determined by the relationship:

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

where "**E**" is the emission rate in pounds per hour and "**p**" is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

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

(b) For Emission Point AA-100, BACT for the two new chip bins will consist of the use of a partial enclosure and a PM/PM_{10} emission limit of 0.05 lbs. / hour. The partial enclosure will consist of a four-sided building with a roof, which will serve to minimize fugitive PM / PM_{10} emissions from the drop loading of chips into the chip bins.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued November 24, 2009)

3.B.7 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-201

(a) For Emission Point AA-201, the permittee shall control the emission of total reduced sulfur so as not to exceed five (5) parts per million of TRS, expressed as hydrogen sulfide on a dry gas basis corrected to 10% oxygen based on a 12-hour average basis.

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

(b) For Emission Point AA-201, all emissions shall be controlled by the LVHC non-condensable gas collection system (Emission Point AA-206).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(c) For Emission Point AA-201, the permittee shall be limited to an annual average throughput of 2,800 air-dried tons of virgin pulp per day (based on a 365-day rolling average).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

3.B.8 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-202(a)

(a) For Emission Point AA-202(a), the brownstock washer system has been determined to be exempt from the provisions of 40 CFR Part 60 – Subpart BBa in accordance with 40 CFR 60.283a(a)(1)(iv). The system will become subject to the provisions of Subpart BBa if the facility is changed so that the gases can be incinerated in accordance with the applicable regulations.

(Ref.: 11 Miss. Admin Code Pt. 2 R. 6.2.A(1).)

(Ref.: 40 CFR 60.283a(a)(1), Subpart BBa)

(b) For Emission Point AA-202(a), as an alternative to controlling emissions from the brownstock washer system, the facility shall continue to implement the Clean Condensate Alternative, as allowed under 40 CFR 63.447 thereby controlling emissions associated with the brownstock washer system.

(Ref.: 40 CFR 63.447, Subpart S)

3.B.9 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-203

(a) For Emission Point AA-203, the permittee shall control the emission of total reduced sulfur so as not to exceed five (5) parts per million of total reduced sulfur (TRS), expressed as hydrogen sulfide on a dry gas basis corrected to 10% oxygen based on a 12-hour average basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(d).)

(b) For Emission Point AA-203, discharge of TRS gases produced from the multiple-effect evaporator system must not exceed 5 ppm by volume on a dry gas basis, corrected to 10 percent oxygen unless the gases are combusted with other waste gases in an incinerator or other device, or combusted in a Lime Kiln (Emission Point AA-501) or Recovery Furnaces (Emission Points AA-401 and AA-402) subject to a minimum temperature of 650ºC (1200ºF) for at least 0.5 seconds.

(Ref.: 40 CFR 60.283(a)(1), Subpart BB)

(c) For Emission Point AA-203, TRS, VOC, and HAP emissions shall be controlled by the non-condensable gas collection system (Emission Point AA-206) and combusted in the Recovery Furnaces (Emission Points AA-401 and AA-402) or Lime Kiln (Emission Point AA-501).

(Ref.: 40 CFR 63.443(a)(1), Subpart S)

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

3.B.10 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-204

For Emission Point AA-204, TRS, VOC, and HAP emissions shall be controlled by the non-condensable gas collection system (Emission Point AA-206) and combusted in the Recovery Furnaces (Emission Points AA-401 and AA-402) or Lime Kiln (Emission Point AA-501).

(Ref.: 40 CFR 63.443(a)(1), Subpart S)

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

3.B.11 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-205

For Emission Point AA-205, TRS and VOC emissions shall be controlled by a separate non-condensable gas collection system. Emissions shall be combusted in the Lime Kiln (Emission Point AA-501).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

3.B.12 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-206

(a) For Emission Point AA-206, the permittee shall use a control device to reduce total HAP emissions from each emission system as follows:

(1) Reduce total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or

(2) A boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts (or 150 MMBTU / hour) by introducing the HAP emission stream with the combustion air.

(40 CFR 63.443(d)(4), Subpart S)

(b) For Emission Points AA-206, each equipment system shall be enclosed and vented into a closed-vent system and routed to a qualified control device. The enclosures and closed-vent system shall meet the requirements specified in Section 3.B.12 and 3.B.13 and more specifically defined in 40 CFR 63.450, Subpart S.

(Ref.: 40 CFR 63.443(c), Subpart S)

(c) For Emission Point AA-206, periods of excess emissions reported under 40 CFR 63.455, Subpart S shall not be a violation of Conditions 3.B.12 and 3.B.13 provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed one (1) percent for control devices used to reduce the total HAP emissions from the LVHC system.

(Ref.: 40 CFR 63.443(e), Subpart S)

(d) For Emission Point AA-206, for each enclosure and closed vent system referenced by Conditions 3.B.12 and 3.B.13 [40 CFR 63.443(c), Subpart S], the permittee shall meet the following requirements for capturing and transporting vent streams that contain HAP:

(1) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e), Subpart S. In addition, each enclosure or hood opening closed during the initial performance test specified in Section 5 of this document and detailed in 40 CFR 63.457(a), Subpart S shall be maintained in the same closed and sealed position as during the performance test at all times except when

necessary to use the opening for sampling, inspection, maintenance, or repairs.

(2) Each component of the closed-vent system used to comply with 40 CFR 63.443(c) and 63.445(b), Subpart S that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR 63.457(d), Subpart S.

(Ref.: 40 CFR 63.457(d), Subpart S)

(e) For Emission Points AA-206, each bypass line in the closed vent system that could divert vent streams containing HAPs to the atmosphere without meeting the emission limitations specified in Conditions 3.B.12 and 3.B.13 [40 CFR 63.443(c) & 63.445(b), Subpart S] shall comply with the following:

(1) On each bypass line, the permittee shall install, calibrate, maintain, and operate (according to the manufacturer's specifications) a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every fifteen (15) minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

(2) For bypass lines that are not computer controlled, the permittee shall maintain the bypass valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal.

(Ref.: 40 CFR 63.450, Subpart S)

3.B.13 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-208

(a) For Emission Point AA-208, one of the following combinations [from 40 CFR 63.446(c)(1) – (3), Subpart S] for HAP-containing pulping process condensates generated, produced, or associated with the equipment systems [as defined in 40 CFR 63.446(b)] shall be subject to the requirements of 40 CFR 63.446(d) and (e), Subpart S.

The permittee currently uses 40 CFR 63.446(c)(3), Subpart S (see Option "(3)" below):

(1) All pulping process condensates from the equipment systems specified in 40 CFR 63.446(b)(1) – (5), Subpart S.

(Ref.: 40 CFR 63.446(c)(1), Subpart S

(2) The combined pulping process condensates from the equipment systems specified in 40 CFR 63.446(b)(4) and (5), Subpart S plus pulping process condensate stream(s) that in total contain at least 65% of the total HAP mass from the pulping process condensates from equipment systems listed in 40 CFR 63.446(b)(1) – (3), Subpart S.

(Ref.: 40 CFR 63.446(c)(2), Subpart S)

(3) The pulping process condensates from equipment systems listed in 40 CFR 63.446(b)(1) – (5), Subpart S that in total contain a total HAP mass of 3.6 kilograms or more of total HAP per megagram (i.e. 7.2 pounds per ton) of Oven-Dried Pulp (ODP) for mills that do not perform bleaching.

(Ref.: 40 CFR 63.446(c)(3), Subpart S)

(b) For Emission Point AA-208, the pulping process condensates shall be conveyed in a closed collection system that is designed and operated to meet the following requirements:

(1) Closed vent systems and control devices shall be designed and operated to meet the individual drain system requirements as specified in 40 CFR 63.960, 63.961, and 63.962 of 40 CFR Part 63 Subpart RR (National Emission Standards for Individual Drain Systems) except that closed vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.450 and 63.443(d) instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii); and

(2) Any condensate tank used in the closed collection system, the tank shall meet the following requirements:

(i) The fixed roof and all openings shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in 40 CFR 63.450, Subpart S, and routed to a control device that meets the requirements of 63.443(d), Subpart S; and

(ii) Each opening shall be maintained in a closed, sealed position at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.

(3) For Emission Point AA-208, the pulping process condensates shall be treated using one of the options outlined in 40 CFR 63.446(e), Subpart S. The permittee currently uses option 63.446(e)(4), Subpart S to treat the pulping process condensates to remove 6.6 lbs. / ODT.

(Ref.: 40 CFR 63.446(d) and (e), Subpart S)

(c) For Emission Point AA-208, each HAP removed from a pulping process condensate stream during treatment and handling shall be controlled as specified in 40 CFR 63.443(c) and (d), Subpart S.

(Ref.: 40 CFR 63.446(f), Subpart S)

(d) For Emission Point AA-208, for each control device used to treat pulping process condensates to comply with the requirements of Condition 3.B.13(b) [i.e. 40 CFR 63.446(e)(3), Subpart S], periods of excess emissions reported under 40 CFR 63.455, Subpart S shall not be a violation of Conditions 3.B.13(a) – (c) [i.e. 40 CFR 63.446(d), (e) and (f), Subpart S] provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed 10%.

(40 CFR 63.446(g), Subpart S)

3.B.14 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-301

For Emission Point AA-301, BACT has been determined to be the use of clean Mill water, mill supply water, non-direct contact condensates, clean condensates, clean indirectly heated water, and/or white water.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued July 9, 2003 – PSD BACT Standard)

3.B.15 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-302

For Emission Point AA-302, the permittee shall be limited to an annual average throughput of 1,300 air-dried tons of secondary pulp per day (based on a 365-day rolling average).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

3.B.16 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-401 AND AA-402

(a) For Emission Points AA-401 and AA-402, during times when spent liquor is fed, excess opacity emissions shall not exceed 35% for six (6) percent or more of the operating time within any quarterly period. On an after October 11, 2019, during periods when spent liquor is fed, excess emissions shall not exceed 35% for two (2) percent or more of the operating time within any semi-annual period.

(Ref.: 40 CFR 63.864(k)(2)(i), Subpart MM)

(b) For Emission Points AA-401 and AA-402, corrective action must be taken when the average of ten consecutive 6-minute average opacity values results in a measurement greater than 20% opacity when spent pulping liquor is being fed. Corrective action can include completion of transient startup and shutdown conditions as expediently as possible.

(Ref.: 40 CFR 63.864(k)(1)(i), Subpart MM)

(c) For Emission Points AA-401 and AA-402, the emission of particulate matter (PM and PM_{10}) from a recovery furnace shall not exceed three (3) pounds per ton of equivalent air-dried Kraft pulp (ADTP) produced at any given time, not to exceed

194.3 pounds per hour and 851.1 tons per year. This is an individual emission limitation (i.e. per furnace) and not a combined total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued on July 9, 2003)

(d) For Emission Points AA-401 and AA-402, the permittee shall not discharge into the atmosphere any gases from an existing Kraft recovery furnace(s), which contain a concentration of particulate matter (PM) in excess of 0.044 grains per dry standard cubic feet (or 0.10 grams or dry stand cubic meter) corrected to 8% oxygen per furnace.

(Ref.: 40 CFR 63. 862(a)(1)(i)(A), Subpart MM)

(e) For Emission Points AA-401 and AA-402, the emission of nitrogen oxides (NO_X) shall be limited to 200.2 pounds per hour and 876.6 tons per year. This is an individual emission limitation (i.e. per furnace) not a combined total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(f) For Emission Points AA-401 and AA-402, the emission of carbon monoxide (CO) shall be limited to 735.6 pounds per hour and 3221.8 tons per year. This is an individual emission limitation (i.e. per furnace) not a combined total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(g) For Emission Points AA-401 and AA-402, the emission of sulfur dioxide (SO_2) shall be limited to 7.0 pounds per air-dried ton of pulp not to exceed 408.3 pounds per hour and 1788.5 tons per year. This is an individual emission limitation (i.e. per furnace) not a combined total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(h) For Emission Points AA-401 and AA-402, the emission of total reduced sulfur compounds (TRS) shall not exceed 35 parts per million, expressed as hydrogen sulfide on a dry gas basis corrected to 8% oxygen, on a 12-hour average basis not to exceed 31.5 pounds per hour and 138.0 tons per year. This is an individual emission limitation (i.e. per furnace) not a combined total.

(Ref.: 11 Miss. Admin. Code Pt. 2. R, 1.4.B(6)(b)(3).)

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified May 28, 2004)

(i) For Emission Points AA-401 and AA-402, the permittee shall route all gases from the Low Volume, High Concentration (LVHC) system to the Recovery Furnaces (Emission Points AA-401 and AA-402) or the Lime Kiln (Emission Point AA-501).

(40 CFR 63.443(d)(4), Subpart S)

3.B.17 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-403

(a) For Emission Point AA-403, the permittee is authorized to use natural gas, bark and wood residuals, waste water treatment system (WWTS) sludge, old corrugated container (OCC) rejects, TDF (tire derived fuel), and plywood residuals. For TDF, the permittee is limited to less than 6% (not to exceed 2,146 tons TDF) of the total fuel heat input on an annual basis for the boiler.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued August 31, 2021)

(b) For Emission Point AA-403, fuel burning operations utilizing a mixture of combustibles such as (but not limited to) fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge, may be allowed particulate matter emission rates up to 0.30 grains per standard dry cubic foot.

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

(c) For Emission Point AA-403, the emission of PM and PM_{10} from the combination boiler shall be limited to 0.1 lbs. / MMBTU not to exceed 91.7 pounds per hour and 401.8 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(d) For Emission Point AA-403, the emission of nitrogen oxides (NO_X) shall be limited to 284.4 pounds per hour and 1,245.6 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(e) For Emission Point AA-403, the emission of carbon monoxide (CO) shall be limited to 1,247.6 pounds per hour and 5,464.8 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(f) For Emission Point AA-403, 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 MMBTU heat input or as otherwise specified herein.

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

(g) For Emission Point AA-403, the emission of sulfur dioxide (SO_2) shall not to exceed 235.50 pounds per hour and 964.30 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(h) For Emission Point AA-403, the emission of volatile organic compounds (VOCs) shall be limited to 88.2 pounds per hour and 386.4 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(i) For Emission Point AA-403, the emission of sulfuric acid mist (H_2SO_4) shall be limited to 3.3 pounds per hour and 14.4 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(j) For Emission Point AA-403, BACT has been determined to be the following:

(1) The use of low NO_X burners;

(2) The use of an Overfire Air System;

(3) The use of Stoker Controls;

(4) The use of a multiclone and electrostatic precipitator; and

(5) The use of good combustion practices.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued July 9, 2003 – PSD BACT Standards)

(k) Emission Point AA-403 is an existing large boiler that is in the "hybrid suspension/grate burner designed to burn wet biomass/bio-based solid" fuel subcategory. The permittee shall comply with all applicable emission limitations for such a unit found in Tables 2, 3 and 4 of Subpart DDDDD, as well as all other requirements that apply to this unit in the subpart.

(Ref.: 40 CFR 63.7485, 63.7499, 63.7500(a)(1), (f), and Tables 2 – 4, Subpart DDDDD)

3.B.18 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-404

(a) For Emission Point AA-404, the maximum permissible emission of ash and/or particulate matter (PM and PM_{10}) when burning fossil fuels shall not exceed an emission rate as determined by the relationship:

$$\mathbf{E} = 0.8808\ (\mathbf{I}^{-0.1667})$$

where "**E**" is the emission rate in pounds per MMBTU per hour heat input and "**I**" is the heat input in MMBTU per hour, not to exceed 3.8 pounds per hour and 16.6 tons per year.

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

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(b) For Emission Point AA-404, the emission of nitrogen oxides (NO_X) shall be limited to 0.17 lbs. / MMBTU not to exceed 577.7 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued April 1, 2004)

(c) For Emission Point AA-404, the emission of carbon monoxide (CO) shall be limited to 30.4 pounds per hour and 133.3 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(d) For Emission Point AA-404, 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 MMBTU heat input, not to exceed 0.46 pounds per hour and 2.0 tons per year.

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

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(e) For the purposes of 40 CFR Part 63 – Subpart DDDDD, Emission Point AA-404 is an existing large boiler that is in the "Gas 1" fuel subcategory and has a continuous oxygen trim system. The permittee shall comply with all applicable Work Practice Requirements for such a unit found in Table 3 of Subpart DDDDD.

(Ref.: 40 CFR 63.7485, 63.7499, 63.7500(a)(1), Subpart DDDDD)

(f) For Emission Point AA-404, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are used will be based on information available to the MDEQ that 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 63.7500(a)(3), Subpart DDDDD)

3.B.19 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-405 AND AA-406

(a) For Emission Points AA-405 and AA-406, the emission of particulate matter from each smelt tank shall be limited to 0.2 pounds per ton of equivalent air-dried Kraft pulp not to exceed 6.5 pounds per hour and 28.3 tons per year. This limit has been established per tank. There are four (4) smelt dissolving tanks.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003))

(b) For Emission Points AA-405 and AA-406, the emission of particulate matter less than 10 microns (PM_{10}) from each smelt tank shall be limited to 5.8 pounds per hour and 25.3 tons per year based on a ratio of 0.895 for PM_{10} to PM. This limit has been established per tank. There are four (4) smelt dissolving tanks.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(c) For Emission Points AA-405 and AA-406, the permittee shall not cause or permit the emission of gas containing sulfur oxides (measured as sulfur dioxide) in excess of 2,000 ppm (volume) from any existing process equipment.

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

(d) For Emission Points AA-405 and AA-406, the permittee shall be limited to sulfur dioxide emissions from each smelt tank of 0.2 pounds per ton of equivalent air-dried Kraft pulp not to exceed 6.5 pounds per hour and 28.3 tons per year. This limit has been established per tank. There are four (4) smelt dissolving tanks.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(e) For Emission Points AA-405 and AA-406, the emission of total reduced sulfur (TRS) compounds shall not exceed 0.016 grams / kilogram (or 0.032 lbs. / ton) (expressed as hydrogen sulfide on a dry gas basis per kilogram of black liquor solids by dry weight) not to exceed 1.17 pounds per hour and 5.1 tons per year. This limit has been established per tank. There are four (4) smelt dissolving tanks.

(Ref. 11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(g).)

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(f) For Emission Points AA-405 and AA-406, the permittee shall not discharge into the atmosphere any gases from existing smelt dissolving tanks, which contain a concentration of particulate matter (PM) in the exhaust gases discharged to the atmosphere in excess of 0.2 lbs. / ton (or 0.10 kg /Mg) of black liquor solids fired.

(Ref.: 40 CFR 63. 862(a)(i)(B), Subpart MM)

3.B.20 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-405, AA-406, and AA-501

(a) For Emission Points AA-405, AA-406 and AA-501, when spent pulping liquor or lime mud (as applicable) is being fired, there shall be no more than six (6) recorded parametric monitoring values (based on a 3-hour block average) that are outside of the parametric ranges established during the initial compliance demonstration as required by 40 CFR 63.865(b), Subpart MM and Condition 5.B.1 of this document

within any 6-month reporting period; with the exception of pressure drop during startup and shutdown. The established parametric ranges may be revised during any subsequent compliance testing.

(Ref.: 40 CFR 63.864(k)(2)(v), Subpart MM)

(b) For Emission Points AA-405, AA-406, and AA-501, when spent pulping liquor or lime mud (as applicable) is being fed, corrective action shall be taken when any 3-hour average parameter value is outside the range of values established as specified in Subpart MM, with the exception of pressure drop during start-up and shutdown. Corrective action can include completion of transient start-up and shutdown conditions as expeditiously as possible.

(Ref.: 40 CFR 63.864(k)(1)(ii), Subpart MM)

(c) For purposes of determining the number of non-opacity monitoring exceedances, no more than one (1) exceedance will be attributed in any given 24-hour period.

(Ref.: 40 CFR 63.864(k)(3), Subpart MM)

3.B.21 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-501

(a) For Emission Point AA-501, the emission of PM and PM_{10} from the lime kiln shall not exceed one (1) pound per ton of equivalent air-dried Kraft pulp.

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

(b) For Emission Point AA-501, the emission of PM and PM_{10} from the lime kiln shall be limited to 0.064 grains per dry standard cubic feet corrected to 10% oxygen, not to exceed 29.9 pounds per hour and 131.0 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 and modified March 4, 2005)

(c) For Emission Point AA-501, the permittee shall not discharge into the atmosphere any gases from the existing Kraft lime kiln, which contain a concentration of particulate matter in excess of 0.064 grains per dry standard cubic feet (or 0.15 grams per dry standard cubic meter) corrected to 10% oxygen.

(Ref.: 40 CFR 63. 862(a)(1)(C), Subpart MM)

(d) For Emission Point AA-501, the emission of nitrogen oxides (NO_X) shall be limited to 95.6 pounds per hour and 418.5 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(e) For Emission Point AA-501, the emission of carbon monoxide (CO) shall be limited to 11.7 pounds per hour and 51.1 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(f) For Emission Point AA-501, the emission of sulfuric acid mist shall be limited to 2.5 pounds per hour and 10.8 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005)

(g) For Emission Point AA-501, the emission of sulfur dioxide (SO_2) shall not exceed 50 ppm by volume on a dry basis corrected to 10% oxygen, not to exceed 23.4 pounds per hour and 102.5 tons per year.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued March 14, 2000; modified January 12, 2001 and modified in PSD Permit to Construct issued March 4, 2005)

(h) For Emission Point AA-501, the emission of total reduced sulfur compounds (TRS) shall not exceed twenty (20) parts per million (expressed as hydrogen sulfide on a dry gas basis corrected to 10% oxygen) based on a 12-hour average basis.

(Ref. 11 Miss. Admin. Code Pt. 2, R. 1.4.B(6)(c).)

(i) For Emission Point AA-501, BACT has been determined to be the following:

(1) The use of a Venturi Scrubber; and

(2) Good combustion control and proper operation of the kiln.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003)

(j) Route all gases from the Low Volume, High Concentration (LVHC) system to the Recovery Furnaces (Emission Points AA-401 and AA-402) or the Lime Kiln (Emission Point AA-501). Route all gases from the Tall Oil Recovery System to the Lime Kiln (Emission Point AA-501).

(Ref.: 40 CFR 63.443(d)(4)(i), Subpart S [LVHC System Gases])

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued July 9, 2003 [Tall Oil Recovery System])

(k) For Emission Point AA-501, the permittee shall evaluate and submit a minimum pH for the caustic scrubber liquid (that will apply when burning pet coke), which provides compliance assurance with the SO_2 emissions limitations for the Lime Kiln when burning pet coke. The minimum pH value may be revised during any subsequent compliance testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005)

3.B.22 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-519

(a) For Emission Point AA-519, the emission of particulate matter (PM) and particulate matter less than 10 microns (PM_{10}) shall be limited to 0.14 pounds per hour and 0.60 tons per year.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005)

(b) For Emission Point AA-519, the permittee shall not operate the emission point without the use of the baghouse.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005)

(c) For Emission Point AA-519, the permittee shall not cause or allow the emission from any manufacturing process in any one (1) hour from any point source particulate matter (PM) in total quantities in excess of the amount determined by the relationship:

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

where "**E**" is the emission rate in pounds per hour and "**p**" is the process weight input rate in tons per hour.

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

(d) For Emission Point AA-519, when pet coke is being stored, handled and transferred on site, the permittee shall employ appropriate combinations of paving, surface cleaning, and dust suppression to prevent the generation of fugitive dust in quantities sufficient to be visibly airborne off of the plant property. These procedures should include but are not limited to the following practices:

(1) The handling and placing of pet coke must be performed in a manner to ensure that there is no airborne pet coke material loss outside of the plant property.

(2) Quarterly inspections of all accessible paved areas, storage piles, truck receiving, grinding, pulverizing, and storage areas to ensure equipment is functioning properly and to prevent buildup of fugitive dust.

(3) Maintain records of all inspections, maintenance, and cleanings conducted. Records shall be maintained on-site for a period of two years. Retain records of all required monitoring data and support information in accordance with Section 5.C of this document. Records shall be made available upon request from MDEQ personnel.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5., as established in the PSD Permit to Construct issued March 4, 2005)

3.B.23 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-703, AA-704, and AA-706

(a) For Emission Points AA-703, AA-704, and AA-706, for purposes of Subpart ZZZZ, these engines are existing compression ignition (CI) emergency stationary RICE with a site rating less than 500 brake HP located at a major source of HAP emissions as defined in 40 CFR Part 63 – Subpart ZZZZ. These engines must comply with the following requirements except during periods of start-up:

(1) Change oil and filter every 500 hours of operation or annually (whichever comes first);

(2) Inspect air cleaner every 1,000 hours of operation or annually (whichever comes first);

(3) Inspect all hoses and belts every 500 hours of operation or annually (whichever comes first) and replace as necessary.

During periods of start-up, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine (not to exceed 30 minutes) after which time the non-start-up emission limitations apply.

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

(b) For Emission Point AA-703, the maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.B.24 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-705

(a) For Emission Point AA-705, this engine is a new compression ignition (CI) emergency RICE with a site rating less than 500 brake HP located at a major source of HAP emissions as defined in 40 CFR 63 Subpart ZZZZ. Therefore, compliance with 40 CFR Part 63 Subpart ZZZZ shall be achieved by meeting all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585, 63.6590, Subpart ZZZZ)

(b) For Emission Point AA-705, the permittee must comply with the emission standards for new CI engines in 40 CFR 60.4201 for their 2007 year model and later stationary CI ICE (as applicable).

(Ref.: 60.4204(b), Subpart IIII)

(c) For Emission Point AA-705, the permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in 60.4204 and 60.4205, Subpart IIII over the entire life of the engine.

(Ref.: 40 CFR 60.4206, Subpart IIII)

(d) For Emission Point AA-705, the maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

3.B.25 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-707 and AA-708

(a) For purposes of Subpart DDDDD, Emission Points AA-707 and AA-708 are existing small boilers that are in the "Gas 1" fuel subcategory. The permittee shall comply with all applicable Work Practice Requirements for such a unit found in Table 3 of Subpart DDDDD.

(Ref.: 40 CFR 63.7485, 63.7499, 63.7500(a)(1), Subpart DDDDD)

(b) For Emission Point AA-707 and AA-708, the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are used will be based on information available to the MDEQ that 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 63.7500(a)(3), Subpart DDDDD)

(c) For Emission Point AA-707 and AA-708, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

(e) For Emission Point AA-707 and AA-708, 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 MMBTU heat input.

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

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs. / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO_2	4.8 lbs. / MMBTU
40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 40 CFR 60.110b, Subpart Kb	3.C.3	VOCs	Recordkeeping

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

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide or SO_2) per MMBTU heat input.

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

3.C.3 The permittee shall comply all applicable requirements found in 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

(Ref.: 40 CFR 60.110b, Subpart Kb)

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	3.D.1	Fugitive Dust	Conduct quarterly inspections, maintenance, and cleaning
AA-100	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	3.D.2	Fugitive Dust	Paving, surface cleaning, and dust suppression
AA-206 AA-208	40 CFR 63.454, Subpart S	3.D.3	HAPs	For each applicable enclosure opening, closed vent system, and closed collection system, prepare and maintain a site-specific inspection plan
AA-401 AA-402	40 CFR 63.864(e)(1), Subpart MM	3.D.4	Metal HAPs	Maintain proper operation of the ESP's automatic voltage control (AVC) beginning October 11, 2019
AA-403	40 CFR 63.7510(e), 63.7515(d), 63.7540(a)(10), and Table 3, Subpart DDDDD	3.D.5	HAPs	Conduct a tune-up of annually
AA-404 AA-707 AA-708	40 CFR 637510(e), 63.7515(d), 63.7540(a)(12), and Table 3, Subpart DDDDD	3.D.6	HAPs	Conduct a tune-up every 5 years

3.D.1 For Emission Point AA-000 (Facility-Wide), the permittee shall conduct quarterly inspections (or more frequently as needed) to monitor the generation of fugitive dust and to prevent the generation of excess fugitive dust. Maintenance and cleaning shall be performed to remove excess dust build-up.

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

3.D.2 For Emission Point AA-100, the permittee shall employ appropriate combinations of paving, surface cleaning, and dust suppression to prevent the generation of fugitive dust in quantities sufficient to be visibly airborne off of the plant property. These procedures should include (but are not limited to) the following practices:

(a) The handling and placing of chips, bark, or any other wood refuse must be performed in a manner to ensure that there is no airborne wood fiber loss outside of the plant property; and

(b) Quarterly inspection of all accessible paved areas, storage piles, log handling, truck receiving, debarking, slashing, shredding, chipping, screening, wood fuel processing, and purchased chip/bark unloading areas to ensure equipment is functioning properly and to prevent buildup of fugitive dust;

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

3.D.3 For Emission Points AA-206, and AA-208, the permittee shall prepare and maintain a site-specific inspection plan for each applicable enclosure opening, closed-vent system, and closed collection system. The plan must include a drawing or schematic of the

components of applicable affected equipment and shall record the following for each inspection:

(a) The date each inspection is conducted;

(b) The equipment type and identification;

(c) The results of negative pressure tests;

(d) The results of leak detection tests;

(e) The nature of the defect or leak and the method of detection (i.e. visual inspection or instrument detection);

(f) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;

(g) The repair methods applied in each attempt to repair the defect or leak;

(h) The reason for the delay if the defect or leak is not repaired within 15 days after discovery of the problem;

(i) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;

(j) The date of successful repair of the defect or leak;

(k) The position and duration of opening of bypass line valves and the condition of any valve seals; and

(l) The duration of the use of bypass valves on computer controlled valves.

(Ref.: 40 CFR 63.454, Subpart S)

3.D.4 For Emission Points AA-401 and AA-402, beginning October 11, 2019, the permittee must maintain proper operation of the ESP's automatic voltage control (AVC).

(Ref.: 40 CFR 63.864(e)(1), Subpart MM)

3.D.5 For Emission Point AA-403 the permittee shall complete an annual tune-up in accordance with paragraphs (a) – (f) below. Each annual tune-up should be completed no more than 13 months after the previous tune-up. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down.

(a) Inspect the burner and clean or replace any components of the burner as necessary (as applicable) (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(b) 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);

(c) 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). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

(d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications (if available) and with any NO_X requirement to which the unit is subject;

(e) 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; and

(f) Maintain on-site and submit, if requested by the MDEQ, an annual report containing the information in 40 CFR 63.7540(a)(10)(vi)(A) – (C).

(Ref.: 40 CFR 63.7510(e), 63.7515(d), 63.7540(a)(10), and Table 3, Subpart DDDDD)

3.D.6 For Emission Points AA-404, AA-707, and AA-708, the permittee shall complete a tune-up every five (5) years in accordance with Condition 3.D.5(a) – (f). Each tune-up must be conducted no more than sixty-one (61) months after the previous tune-up. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shut down.

(Ref.: 40 CFR 63.7510(e), 63.7515(d), 63.7540(a)(12), and Table 3, Subpart DDDDD)

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices by January 31 of each calendar year for the preceding calendar year. Each compliance certification shall include the following:

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

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

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

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

(a) The date, place as defined in the permit, and time of sampling or measurements;

(b) The date(s) analyses were performed;

(c) The company or entity that performed the analyses;

(d) The analytical techniques or methods used;

(e) The results of such analyses; and

(f) The operating conditions existing at the time of sampling or measurement.

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each year 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 Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

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

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

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

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

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

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

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1(a) and (b)	Fugitive Dust	Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.1 and 5.B.1 (b) of this document.
		5.B.1(c)	Test Methods and Requirements	Demonstrate compliance with emission limitations identified in Section 3 by conducting performance testing in accordance with the frequency and methods identified in 5.B.1(c)(1) – (12).
AA-405 AA-406 AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1(d)	Visible Emissions	Perform visible emissions inspections in accordance with the tiered inspection schedule detailed in Condition 5.B.1(d). Maintain records of all inspections conducted and any VEE's that are performed.
AA-100	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.2	Fugitive Dust	Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.2 of this document.
AA-201	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3(a)	Pulp Production Rate	Maintain records of the throughput of air dried virgin pulp in tons per day, calculated daily as a rolling 365-day average, and in tons per year calculated daily as a 365-day rolling total.
	40 CFR 52.21(r)(6)(iii) and (v), Subpart A	5.B.3(b)	$PM_{2.5}$	Monitor emissions of $PM_{2.5}$ for the 5-year period, 2018 through 2022, as a result of the "Installation of the Advance Process Control (APC) system" project submitted to MDEQ on November 10, 2015.
AA-203	40 CFR 60.284(d)(3), Subpart BB	5.B.4	Excess Emissions	Maintain records of any occurrence of excess emissions from any multiple effect evaporator system and flash evaporator system.
AA-206	40 CFR 63.453(k), Subpart S	5.B.5(a)	Enclosures and Closed Vent System	Monitor, inspect, and record the requirements of 40 CFR 63.453(k) for each enclosure and closed vent system used to comply with 40 CFR 63.450(a).
AA-206 AA-208	40 CFR 63.453(m), Subpart S	5.B.5(b)	HAPs	If the permittee elects to use a control device, technique, or an alternative parameter other than those specified in Section 5.B.6 of this document, the permittee must obtain prior approval from the MDEQ. In addition, the permittee shall install a CMS, and establish appropriate operating parameters to be monitored that sufficiently demonstrate continuous compliance with the applicable control requirements.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-206 AA-208	40 CFR 63.453(n)(1) through (n)(4), Subpart S	5.B.5(c)	Operating Parameters	The permittee may establish or reestablish the value for each operating parameter required to be monitored as specified in Section 5.B.6 of this document as detailed in 40 CFR 63.453(n).
	40 CFR 63.453(o), Subpart S	5.B.5(d)	Control Device	For each control device subject to the monitoring provisions of this 40 CFR 63.453, the permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored as specified 40 CFR 63.453(a) – (n) (as applicable).
	40 CFR 63.454(b), Subpart S	5.B.5(e)	Site-Specific Inspection Plan	The permittee shall maintain records of all information required by the site-specific inspection plan developed in accordance with Section 3.D.4 of this document.
AA-206	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6(a)	NCG Collection System	Perform monthly inspections and corrective maintenance.
		5.B.6(b)	Operating Time	Maintain daily records of the operating time of the NCG system.
		5.B.6(c)	NCG Venting	Maintain daily records of the NCG System venting to atmosphere.
AA-207 AA-208	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.7	CCA Parameters	Maintain records to demonstrate compliance with the Clean Condensate Alternative in accordance with Condition 5.A.3.
AA-208	40 CFR 63.453(g), Subpart S	5.B.8(a)	Steam Stripper Parameters	Install, calibrate, certify, operate, and maintain a CMS to measure the parameters specified by 40 CFR 63.453(g) for each steam stripper used to comply with the treatment requirements in 40 CFR 63.446(e)(4).
	40 CFR 63.453(i), Subpart S 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.8(b)	Operational Parameters	Install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a CMS to measure the appropriate parameters determined in accordance with 40 CFR 63.446(e)(4) used to comply with the condensate applicability requirements specified in 40 CFR 63.446(c).
	40 CFR 63.453(l)(1), Subpart S	5.B.8(c)	Pulping Process Condensate Closed Collection System	Monitor, Inspect, and Record the Requirements of 40 CFR 63.453(l) (1) for each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d)
	40 CFR 63.453(1)(2), Subpart S	5.B.8(d)	Condensate Tank	Each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in 40 CFR 63.446(d)(2)(i) measured initially and annually, thereafter, by the procedures specified in 40 CFR 63.457(d).

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-208	40 CFR 63.453(l)(3), Subpart S	5.B.8(e)	Pulping Process Condensate Closed Collection System	If an inspection required by 40 CFR 63.453(l) identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured; then corrective actions specified in 40 CFR 63.964(b) of subpart RR of this part shall be taken.
AA-301	40 CFR 52.21(r)(6)(iii) and (v)	5.B.9	$PM_{2.5}$	Monitor emissions of $PM_{2.5}$ as a result of the "No. 1 Paper Machine improvement" for the 5-year period 2016 through 2020, and No. 2 Paper Machine improvement" projects for the 5-year period 2015 through 2019 submitted to MDEQ on March 18, 2014 (No. 2 Paper Machine) and November 4, 2014 (No. 1 Paper Machine).
AA-302	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.10	Pulp Production Rate	Maintain records of the throughput of Air Dried Secondary Pulp in tons per day, as a rolling 365-day average calculated daily, and tons per year, as a rolling 365-day total calculated daily.
AA-401 AA-402 AA-405 AA-406 AA-501	40 CFR 63.865, Subpart MM 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.11(a)	HAP Metals	The facility must conduct an initial performance test and periodic performance tests using the test methods and procedures listed in 40 CFR 63.7 and 63.865(b) and 5.B.1 of this document. The permittee must conduct the first of the periodic performance tests by October 13, 2020, and thereafter within 5 years following the previous performance test.
	40 CFR 63.864(j), Subpart MM	5.B.11(b)	Operating Ranges for Parametric Monitoring	During the initial performance test for HAP Metals, the permittee must establish operating ranges for the monitoring parameters specified in 40 CFR 63.864(e)(10), (13), and (14). The permittee may base operating ranges on values recorded during previous performance tests. Expanded or replacement operating ranges may be established during subsequent performance tests.
	40 CFR 63.866(b), 63.864(k)(1)(i) – (ii), and 63.864(k)(2)(i), (iii), Subpart MM	5.B.11(c)	Corrective Action	The facility must maintain records of any occurrence when corrective action is required under 40 CFR 63.864(k)(1) and when a violation is noted under 40 CFR 63.864(k)(2).
	40 CFR 63.866(b), Subpart MM	5.B.11(d)	Parametric Monitoring	The facility must maintain the general records required by 40 CFR 63.10(b)(2)(iii), (vi), and (vii) through (xiv) plus any parameter monitoring data required under 40 CFR 63.864; all records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(b); and records of any monitoring parameter ranges established for each affected source or process unit.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-401 AA-402 AA-405 AA-406 AA-501	40 CFR 63.864(e)(10), Subpart MM	5.B.11(e)	Scrubbing Liquid Flow rate	Monitor and Record the Scrubbing Liquid Flow Rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(c)(10). The monitoring device must be accurate to within ±5 percent of the design scrubbing liquid flow rate.
	40 CFR 63.8(c), Subpart A 63.864(e)(10), Subpart MM	5.B.11(f)	Pressure Drop	Monitor and Record the Pressure Drop utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(e)(10). The monitoring device must be certified by the manufacturer to be accurate to within a gauge pressure of ±500 pascals (±2 inches of water gauge pressure.
	40 CFR 63.866(d), Subpart MM	5.B.11(g)	Metal HAPs	On and after October 11, 2019, the following requirements must be met: (1) In the event that an affected unit fails to meet an applicable standard, including any emission limit in 40 CFR 63.862 or any opacity or CPMS operating limit in 40 CFR 63.864, record the number of failures. For each failure, record the date, start time, and duration of each failure. (2) For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, and the following information: (i) For any failure to meet an emission limit in 40 CFR 63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions. (ii) For each failure to meet an operating limit in 40 CFR 63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the MDEQ. (3) Record actions taken to minimize emissions in accordance with 40 CFR 63.860(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-401 AA-402	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(a)(1) 5.B.1(c)	PM / PM_{10}	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Methods 1-5
AA-401 AA-402	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(a)(2) 5.B.1(c)	SO_2	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 8
		5.B.12(a)(3) 5.B.1(c)	TRS	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 16 or 16A
		5.B.12(a)(4) 5.B.1(c) 5.B.13(c)	NO_X	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 7
		5.B.12(a)(5) 5.B.1(c)	CO	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 10
		5.B.12(b)	ESP Inspections	Perform weekly inspections and corrective action (as necessary) on the electrostatic precipitator (ESP) control device(s).
		5.B.12(c)	ESP Operation and Maintenance Plan	Maintain an Operation and Maintenance (O & M) Plan for the electrostatic precipitator (ESP) control device(s).
AA-401 AA-402	11 Miss. Admin. Code Pt. 2, R. 1.4.D(2). 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(d)	O_2	Continuously monitor the oxygen concentration in the furnace(s) using 40 CFR 60 Appendix B, Performance Specification 3.
	11 Miss. Admin. Code Pt. 2, R. 1.4.D(1)(b). 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(e)	TRS	The permittee shall monitor the TRS concentration in the furnace(s) Flue Gas by performance of EPA Method 16, 16A, or 16C on a quarterly basis. Each successive quarter's testing shall be separated from the previous quarter by a period of not less than sixty (60) days and prior notice to the MDEQ of all testing shall be made.
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6). 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(f)	O_2	Calculate and record on a daily basis, 12-hour average O_2 concentrations from the two recovery furnace(s) for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 continuous 1-hour average concentrations.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). 40 CFR 63.866(c)(1), Subpart MM	5.B.12(g)	Black Liquor Solids	Record and maintain records of the black liquor solids (BLS) firing rate in tons/day (or megagrams per day) daily.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-401 AA-402	40 CFR 63.864(d)(3), Subpart MM	5.B.12(h)	Opacity	The facility must Install, Maintain, Operate, and Calibrate a continuous opacity monitoring system for the recovery furnace to record opacity at least once every successive 10-second period and Calculate and Record each successive 6-minute average opacity using the procedures set forth in 40 CFR 63.6(h) and 63.8.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12(i)	Non-Condensable Gases	Maintain records of the hours of incineration of NCGs, on both a daily and an annual (calendar year) basis.
	40 CFR 63.866(c)(8), Subpart MM	5.B.12(j)	Metal HAPs	On and after October 11, 2019, maintain records demonstrating compliance with the requirement in 40 CFR 63.864(e)(1) to maintain proper operation of an ESP's AVC.
AA-403	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.13(a)(1) 5.B.1(c)	PM	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Methods 1-5
		5.B.13(a)(2) 5.B.1(c)	SO_2	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 8
		5.B.13(a)(3) 5.B.1(c)	NO_X	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 7
		5.B.13(a)(4) 5.B.1(c)	CO	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 10
		5.B.13(a)(5) 5.B.1(c)	VOC	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 25 or 25A
		5.B.13(a)(6) 5.B.1(c)	H_2SO_4	One Time per life of the Permit; EPA Reference Method 8
		5.B.13(b)	Fuel Records	Maintain records of the monthly usage rates of amount of tire derived fuel (TDF), other solid fuels (OCC rejects, plywood residuals, WWTS sludge, wood and bark combined), and natural gas based on a 12-month rolling total.
		5.B.13(c)	Fuel Feed Rate	Maintain records of the total fuel feed rate to the boiler monthly and the percentage of TDF in the total feed rate to the boiler monthly and annually.
		5.B.13(d)	Opacity	Perform continuous emission monitoring of Opacity and maintain records of the opacity readings. The monitors shall be operated in accordance with 40 CFR Part 60, Appendix B – Performance Specification 1.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-403	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.13(e)	ESP Inspections	Perform weekly inspections and corrective action (as necessary) on the electrostatic precipitator (ESP) control device(s).
		5.B.13(f)	ESP Operation and Maintenance Plan	Maintain an Operation and Maintenance (O & M) Plan for the ESP control device(s).
	40 CFR 63.7505, 63.7510, 63.7515, 63.7520, and 63.7530, Subpart DDDDD	5.B.13(g)	HAPs	Demonstrate compliance with the applicable emission limits in Condition 3.B.17(k) using performance stack testing, fuel analysis, or continuous monitoring systems (CMS).
	40 CFR 63.7525, Subpart DDDDD	5.B.13(h)	HAPs	Conduct all applicable monitoring, installation, operation, and maintenance requirements in accordance with 40 CFR 63.7525.
	40 CFR 63.7540 and 63.7541, Subpart DDDDD	5.B.13(i)	HAPs	Demonstrate continuous compliance with all applicable emission limits, fuel specifications and work practice standards in accordance with 40 CFR 63.7540 and 63.7541.
	40 CFR 63.7555 and 63.7560, Subpart DDDDD	5.B.13(j)	HAPs	Keep all applicable records according to 40 CFR 63.7555. Records must be kept in a form suitable and ready for expeditious review and for the length of time according to 40 CFR 63.10(b)(1).
AA-404	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.14(a)(1) 5.B.1(c)	NO_X	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 7
	40 CFR 52.21(r)(6)(iii and v), Subpart A	5.B.14(d)		Monitor emissions of NOx as a result of the project for increasing the steam production in the No. 1 Turbine Generator Set submitted to the MDEQ on March 07, 2019 for the 5-year period 2020 through 2024.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.14(a)(2) 5.B.1(c)	CO	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 10
		5.B.14(c) 5.B.1(c)	Opacity	Perform continuous emission monitoring of Opacity and maintain records of the opacity readings. The monitors shall be operated in accordance with 40 CFR 60, Appendix B, Performance Specification 1.
		5.B.14(b)	Fuel Consumption	Maintain monthly records of the consumption of natural gas.
AA-405 AA-406	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.15(a)(1) 5.B.1(c)	PM / PM_{10}	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Methods 1-5 (each tank)
		5.B.15(a)(2) 5.B.1(c)	SO_2	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 8 (each tank)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-405 AA-406	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.15(a)(3) 5.B.1(c)	TRS	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2003; EPA Reference Method 16 or 16A (each tank)
		5.B.15(b)	Inspections	Perform weekly inspections and corrective maintenance on the four (4) smelt dissolving tanks to assure their performance achieves compliance.
	40 CFR 63.864(e)(10), Subpart MM	5.B.15(c)(1)	Scrubbing Liquid Flow Rate	Monitor and record the scrubbing liquid flow rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 63.864(e)(10). The monitoring device must be accurate to within ±5 percent of the design scrubbing liquid flow rate.
	40 CFR 63.864(e)(10), Subpart MM	5.B.15(c)(2)	Pressure Drop	Monitor and record the pressure drop utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 63.864(a)(2)(ii). The monitoring device must be certified by the manufacturer to be accurate to within a gauge pressure of ±500 pascals (±2 inches of water gauge pressure).
AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(a)(1) 5.B.1(c)(12)	PM / PM_{10}	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Methods 1-5
		5.B.16(a)(2) 5.B.1(c)(12)	SO_2	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Method 8
		5.B.16(a)(4) 5.B.1(c)(12)	NO_x	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Method 7
		5.B.16(a)(5) 5.B.1(c)(12)	CO	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Method 10
		5.B.16(a)(6) 5.B.1(c)(12)	Opacity	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Method 9
		5.B.16(a)(7) 5.B.1(c)(12)	Sulfuric Acid Mist	Biennial Stack Test as determined by timing of initial test conducted prior to December 31, 2005; EPA Reference Method 8
		5.B.16(b)	Scrubber Inspections	Perform weekly inspections and corrective maintenance of the Lime Kiln Scrubber as necessary to ensure compliance. The inspection shall include verification of the venturi scrubber pressure drop, and the scrubber liquid flow rate.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(c)	Non-Condensable Gases	Maintain records of the hours of incineration of NCGs, on both a daily and an annual (calendar year) basis.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). 40 CFR 63.866(c)(2), Subpart MM	5.B.16(d)	CaO Production Rates	Record the CaO production rate in tons / day (or megagrams per day).
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(e)	O_2	Continuously monitor the oxygen concentration in the lime kiln flue gas in accordance with 40 CFR Part 60, Appendix B – Performance Specification 3.
	11 Miss. Admin. Code Pt. 2, R. 1.4.D(1)(b). 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(f)	TRS	Continuously monitor the TRS concentration in the lime kiln flue gas in accordance with 40 CFR Part 60, Appendix B – Performance Specification 5. Instrument accuracy must be verified at least once every five (5) years, as well as anytime there is cause to question instrument reliability.
	11 Miss. Admin. Code Pt. 2, R. 1.4.B(6). 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(g)	TRS O_2	Calculate and record on a daily basis, 12-hour average TRS and O_2 concentrations from the lime kiln for the two consecutive periods of each operating day. The calculations should be corrected to 10% by volume oxygen. Per MDEQ letter of October 25, 2004, CEM accuracy verification for the TRS/O_2 CEMs is to be performed no less than once every 5 years, as well as any time there is cause to question CEM reliability.
	40 CFR 63.864(e)(10), Subpart MM	5.B.16(h)(1)	Scrubbing Liquid Flow Rate	Monitor and Record the Scrubbing Liquid Flow Rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(e)(10). The monitoring device must be accurate to within ±5 percent of the design scrubbing liquid flow rate.
	40 CFR 63.864(e)(10), Subpart MM	5.B.16(h)(2)	Pressure Drop	Monitor and Record the Pressure Drop utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(a)(2)(ii). The monitoring device must be certified by the manufacturer to be accurate to within a gage pressure of ±500 pascals (±2 inches of water gage pressure).
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(i)	pH	Submit a minimum pH for the caustic scrubber liquid, which provides compliance assurance with the SO_2 emissions limitations for the Lime Kiln when firing pet coke. The minimum pH shall be established using the correlation of pH monitoring collected during the performance test required in this permit.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16(j)	pH	Monitor and record the scrubbing liquid pH on a once per shift basis when pet coke is fired in unit.
AA-401 AA-402 AA-501	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.17(a)	LVHC Waste Streams	Maintain records of the following: (1) Periods when either the Lime Kiln or the Recovery Furnaces serve as the primary control device for LVHC waste streams; (2) Periods when the Recovery Furnaces and the Lime Kiln are all out-of-service and the LVHC waste streams are vented directly to the atmosphere; Such records shall include the date, time, duration, and operating conditions under which the scenario occurred. All records shall be kept in accordance with Condition 5.A.3 of this document. The permittee shall report these records on a quarterly basis. These reports shall be submitted within twenty (20) days following the end of the reporting period.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.17(b)	Maintenance & Upsets	Maintain daily records of maintenance and upsets. The items to be recorded include but are not limited to the following: (1) The date, time, and details of scheduled outages and excess emissions of any equipment during the outage or upon restart of the equipment; (2) The loss of function of any control device; (3) The occurrence of any extreme increases and/or decreases in the loading to a control device not otherwise caused by an outage as referenced in item (a) above; (4) All routine inspections, any maintenance performed, and the determination of the cause of an upset in operations.
AA-405 AA-406 AA-501	40 CFR 64 – Compliance Assurance Monitoring 40 CFR 64.2	5.B.18	SO_2	CAM Plan Requirements.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-519	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.19(a)	Opacity	Perform monthly opacity observations. Perform visible emission observations during truck unloading once per month and maintain a log of the results. If conditions are such that visible emissions are observed during that time period, then the permittee shall perform an EPA Method 9 test. If conditions are such that readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. If no truck unloading operations occur during a month, the permittee shall make note of this in the log.
		5.B.19(b)	Baghouse	Perform inspections each month when the baghouse has been operated, or more often as needed, and maintenance shall be performed as dictated by inspection results so that proper operation of the baghouse is maintained. Records of any inspections and/or maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by Office of Pollution Control personnel. If no truck unloading operations occur during a month, the permittee shall make note of this in the log.
		5.B.19(c)	Maintenance and Upsets	Maintain sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of failure of pollution control equipment, the permittee shall be subject to the provisions with respect to upsets, start-ups, shutdowns, and maintenance.
AA-703	40 CFR 63.6625(e), (f), and (i), Subpart ZZZZ	5.B.20(a)	HAPs	Monitoring, Recordkeeping and Reporting
	40 CFR 63.6640(f)(1)(i) – (iii), Subpart ZZZZ	5.B.20(b)		Monitoring, Recordkeeping and Reporting
	40 CFR 63.6655(e), (f) and 63.6660 (b), (c), Subpart ZZZZ	5.B.20(c)		Monitoring, Recordkeeping and Reporting

5.B.1 FACILITY-WIDE TESTING AND INSPECTION REQUIREMENTS

(a) Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.1 of this document. Records should be maintained on-site in accordance with Condition 5.A.3 of this document. Records should be made available upon request from the MDEQ personnel.

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

(b) The permittee shall maintain daily records of maintenance and upsets on all emission points cited in this permit. Information to be recorded include the following:

(1) The dates and details of scheduled outages and excess emissions of any equipment during the outage or upon restart of the equipment.

(2) The loss of function of any control device.

(3) Any extreme increases or decreases in the loading to control devices not otherwise caused by outages referenced by item (1) above.

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

(c) Except as otherwise specified herein, the permittee shall demonstrate compliance with the emissions limitations identified in Section 3 of this document by conducting performance testing in accordance with the frequency and methods identified in Section 5.B, or an otherwise approved method, and with the procedures outlined below:

(1) All required performance testing must be conducted biennially as determined by the initial testing.

(2) Performance testing for Emission Points AA-401 and AA-402 for total reduced sulfur compounds shall be performed on a quarterly basis using EPA Reference Methods 16, 16A, or 16C. Each successive quarter's testing shall be separated by a period of not less than sixty (60) days, and prior notice to MDEQ must be made.

(3) Performance testing for Emission Point AA-208 must be conducted in accordance with the requirements set forth in 40 CFR 63.453, Subpart S and 5.B.8(a) of this document. Testing must be performed at the maximum capacity of the applicable unit.

(4) Documentation of operating conditions during testing for process equipment and control devices shall be provided with the test report. Such documentation includes but is not limited to, fuel quality analyses; fuel flow/firing rates; steam production rates; scrubbing liquid flow rate and pressure; electrostatic precipitator field electrical data; production rate of air-dried pulp; and production rate of CaO from the lime kiln.

(5) The permittee may request a pretest conference to discuss the test methods and procedures, if needed. The pretest conference should be scheduled at least thirty (30) days prior to the test date.

(6) For emission units and/or pollutants that have associated periodic / parametric monitoring, the required monitoring shall be performed during the performance testing and the results recorded.

(7) For VOC emissions testing conducted in accordance with EPA Reference methods 25 or 25A, the permittee must convert the emissions results,

measured "as carbon", to the equivalent standard "as VOC" emissions. Note that Method 25 measures total gaseous non-methane organic compound and Method 25A measures total hydrocarbon concentrations in terms of the gas used to calibrate the analyzer.

(8) For sources subject to standards outlined in 40 CFR 63, the permittee shall perform any required initial performance testing within 180 days after the compliance date specified in the applicable subpart, as specified herein, and in accordance with 63.7(a)(2), Subpart A.

(9) The permittee must provide adequate and safe sampling facilities for the purpose of compliance demonstration with the provisions of this permit.

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

(Ref.: 40 CFR 60, Subpart A, and 40 CFR 63.7, Subpart A)

(10) Special Testing Requirements:

(i) For Emission Points AA-401 and AA-402, record the black liquor solids firing rate during each performance test.

(ii) For Emission Point AA-404, determine the maximum average fuel-firing rate during testing.

(iii) For Emission Point AA-501, performance testing must be performed while controlling NCGs.

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

(11) For Emission Point AA-404, the permittee shall demonstrate compliance with nitrogen oxide emission limitation by stack testing in accordance with EPA Reference Method 7. After the economizer is installed on Emission Point AA-404, the permittee shall conduct the stack test within 60 days of attaining the maximum production rate, but no later than 180 days of startup, and biennially thereafter as determined by timing of initial test conducted prior to December 31, 2003 (The most recent tests was conducted on October 26, 2017). For the purpose of compliance demonstration, the permittee shall operate the source at maximum capacity. The permittee shall submit the stack test report within 60 days of performing the test.

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

(12) For Emission Point AA-501, all performance testing required by this permit must be conducted within 180 days of certifying construction and biennially thereafter as determined by timing of initial test conducted prior to December 31, 2005 (The most recent test for SO_2, NO_x, CO, PM, Opacity and Sulfuric Acid Mist were conducted on October 26, 2017). Testing should be performed for gas-firing only as long as the Mill is not burning pet coke. If the Mill chooses to burn pet coke in the future, stack testing would be conducted firing pet coke within 180 days of starting to fire pet coke.

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

(d) For Emission Points AA-405, AA-406, and AA-501 (subject to Condition 3.A.1 of this document), the permittee shall follow the following procedure:

(1) Conduct weekly inspections for visible emissions.

(2) If any visible emissions greater than 40% are detected (one-minute interval), with the exception of steam plumes, conduct a minimum of one six-minute observation in accordance with EPA Reference Method 9.

(3) Upon observation of visible emissions from an emission point, the frequency of observation for that emission point shall become daily until no emissions are observed for seven consecutive days.

(4) After seven consecutive days of no visible emission observations, the inspection frequency may be reduced to weekly.

(5) If no visible emissions are observed after three consecutive months of weekly observations, the frequency may be reduced to monthly. However, if emissions are observed during a monthly inspection, the frequency of inspection shall revert to the daily schedule as specified above.

(6) The permittee shall maintain records of all applicable opacity inspections and any VEE's that are performed in accordance with Condition 5.A.3 of this document.

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

5.B.2 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-100

Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.2 of this document. Records should be maintained on-site in accordance with Condition 5.A.3 of this document. Records should be made available upon request from MDEQ personnel.

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

5.B.3 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-201

(a) For Emission Point AA-201, the permittee shall maintain records of the throughput of Air Dried Virgin Pulp in tons per day, calculated daily as a rolling 365-day average, and in tons per year calculated daily as a 365-day rolling total.

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

(b) For Emission Point AA-201, the permittee shall monitor the emissions of particulate matter less than 2.5 microns ($PM_{2.5}$) that could increase as a result of the "Installation of the Advance Process Control (APC) system" project submitted to MDEQ on November 10, 2015. The permittee shall calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis for a period of

five (5) years following resumption of regular operations after the change in accordance with 40 CFR 52.21(r)(6)(iii).

This requirement would be satisfied in 2022. The permittee shall submit a report to the MDEQ if the annual emissions, in tons per year, exceed the baseline actual emissions by a significant amount, and if such emissions differ from the preconstruction projection. This report shall contain the information outlined in 40 CFR 52.21(r)(6)(v) and shall be submitted within 60 days after the end of each year.

The permittee shall make the information required to be documented and maintained pursuant to 40 CFR 52.21(r)(6) available for review upon a request for inspection by MDEQ or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii).

(Ref.: 40 CFR 52.21(r)(6), Subpart A)

5.B.4 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-203

For Emission Point AA-203, maintain records of any occurrence of excess emissions from any multiple effect evaporator system and flash evaporator system. Excess emissions shall be defined as follows:

(a) All twelve-hour average TRS concentrations above five (5) ppm by volume unless the provisions of 40 CFR 60.283(a)(1)(i), (ii), or (iv), Subpart S apply; or

(b) All periods in excess of five (5) minutes and their duration, which the combustion temperature at the point of incineration is less than 1200ºF where the provisions of 40 CFR 60.283(a)(1)(iii) apply.

(Ref.: 40 CFR 60.284(d)(3), Subpart BB)

5.B.5 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-206 and AA-208

(a) For Emission Points AA-206, the permittee shall meet the following requirements for each enclosure and closed-vent system used to comply with 40 CFR 63.450(a), Subpart S:

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b), Subpart S shall be performed at least once monthly, with at least fifteen (15) days elapsed time between inspections, to ensure the opening is maintained in the closed position and sealed.

(2) Each closed-vent system specified by 40 CFR 63.450(a), Subpart S shall be visually inspected monthly with at least 15 days elapsed time between inspections, and as necessary to ensure proper function. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, the permittee must demonstrate that there were no detectable leaks as specified in 40 CFR 63.450(c), Subpart S to be measured initially and

annually, thereafter, in accordance with the procedures specified in 40 CFR 63.457(d), Subpart S.

(4) The permittee must demonstrate initially and annually, thereafter, that each applicable enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e), Subpart S.

(5) The valve or closure mechanism specified in 40 CFR 63.450(d)(2), Subpart S shall be inspected at least monthly, with at least 15 days elapsed time between inspections, to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

(6) If an inspection required by items (a)(1) – (5) of this condition identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, Subpart S; or, if an instrument reading of 500 parts per million by volume or greater above background is measured; or, if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

(i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than five (5) calendar days after the problem is identified.

(ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

(Ref.: 40 CFR 63.453(k), Subpart S)

(b) For Emission Points AA-206 and AA-208, if the permittee elects to use a control device, technique, or an alternative parameter other than those specified in Sections 5.B.6 of this document, the permittee must obtain prior approval from the MDEQ. In addition, the permittee shall install a CMS, and establish appropriate operating parameters to be monitored that sufficiently demonstrate continuous compliance with the applicable control requirements. A modification of the Title V permit may be required for implementation of this option.

(Ref: 40 CFR 63.453(m), Subpart S)

(c) For Emission Points AA-206 and AA-208, the permittee may establish or reestablish the value for each operating parameter required to be monitored as specified in Sections 5.B.6 of this document and more specifically detailed in 40 CFR 63.453(n), Subpart S by following the procedures listed below:

(1) During the initial performance test required in 40 CFR 63.457(a), Subpart S or any subsequent performance test, continuously record the operating parameter;

(2) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;

(3) The permittee shall submit for approval by the MDEQ, the rationale for selecting the monitoring parameters necessary to comply with Condition 5.B.5; and

(4) The permittee shall submit for approval by the MDEQ, the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.

(Ref.: 40 CFR 63.453(n)(1) – (n)(4), Subpart S)

(d) For Emission Points AA-206 and AA-208, for each control device subject to the monitoring provisions of this 40 CFR 63.453; Subpart S, the permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored as specified in 40 CFR 63.453(a) – (n), Subpart S (as applicable).

Note, except as provided in 40 CFR 63.443(e) or 63.446(g); Subpart S, operation of the control device below the established minimum operating parameter values or above the established maximum operating parameter values; or failure to perform required procedures set forth in Subpart S shall constitute a violation of the applicable emission standard of Subpart S and must be reported as a period of excess emissions.

(Ref.: 40 CFR 63.453(o), Subpart S)

(e) For Emission Points AA-206 and AA-208, the permittee shall maintain records of all information required by the site-specific inspection plan developed in accordance with Condition 3.D.3 of this document. These records should be made available upon request by MDEQ personnel.

(Ref.: 40 CFR 63.454(b), Subpart S)

5.B.6 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-206

(a) For Emission Point AA-206, the permittee shall perform monthly inspections and as necessary, perform corrective maintenance on the non-condensable gas (NCG) system to assure their performance achieves compliance with the terms and conditions of this permit.

Specifically, the permittee must verify that TRS bearing gases from the flash evaporator hot well vent, multiple effect evaporator, turpentine system, blow tank,

and steaming vessel condenser vent are properly collected, diluted, and fired in the Recovery Furnaces (Emission Points AA-401 and AA-402) or the Lime Kiln (Emission Point AA-501). All records of inspections and maintenance shall be kept in log form in accordance with Condition 5.A.3 of this document and made available for MDEQ review.

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

(b) For Emission Point AA-206, the permittee shall maintain daily records of the operating time of the non-condensable gas (NCG) system. All records shall be maintained in accordance with Condition 5.A.3 of this document and made available for MDEQ review.

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

(c) For Emission Point AA-206, the permittee shall maintain daily records of the amount of time the NCG system is vented to atmosphere. All records shall be maintained in accordance with Condition 5.A.3 of this document and made available for MDEQ review.

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

5.B.7 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-207 and AA-208

The permittee shall maintain records to demonstrate compliance with the Clean Condensate Alternative in accordance with Condition 5.A.3.

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

5.B.8 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-208

(a) For Emission Point AA-208, the permittee shall install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a Continuous Monitoring System (as defined in 40 CFR 63.2, Subpart A) to measure the following parameters for the steam stripper used to comply with the treatment requirements in 40 CFR 63.446(e)(4), Subpart S:

(1) The process wastewater feed rate (foul condensates);

(2) The steam feed rate; and

(3) The process wastewater column feed temperature.

To establish or reestablish the value for each operating parameter required to be monitored under 40 CFR 63.453(g); Subpart S, the procedures specified in 40 CFR 63.453(n), Subpart S are to be followed.

(Ref.: 40 CFR 63.453(g), Subpart S)

(b) For Emission Point AA-208, to comply with the condensate applicability requirements specified in 63.446(c); Subpart S, the permittee shall install, calibrate,

certify, operate, and maintain, in accordance with the manufacturer's specifications, a Continuous Monitoring System (as defined in 40 CFR 63.2, Subpart A) to measure the flow and density of methanol to the recovery furnaces.

(Ref.: 40 CFR 63.453(i), Subpart S)

Per the MDEQ's 2005 approval of the Mill's Compliance Plan for the CCA (40 CFR 63.447, Subpart S):

(1) Methanol flow going from the methanol storage tank to the recovery furnaces is measured using a CMS.

(2) Methanol flow is converted to mass using a density obtained by the same CMS. This amount represents the quantity of methanol that is to be treated per 40 CFR 63.446(e), Subpart S.

(3) Methanol collection is determined by dividing the quantity of methanol treated by the stripper efficiency.

(4) Daily pulp production is calculated on an oven-dried ton (ODT) basis. Compliance is demonstrated by dividing methanol collected and treated by daily pulp production (ODT) as a 15-day rolling average.

(5) 85% of the methanol treated is allocated to Phase I compliance (40 CFR 63.446, Subpart S) and the remaining 15% is allocated to Phase II compliance (CCA – 40 CFR 63.447, Subpart S). These allocations may be revised upon demonstrated justification by the Mill and approval by the MDEQ.

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

(c) For Emission Point AA-208, the permittee shall meet the following requirements for each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d), Subpart S:

(1) Each pulping process condensate closed collection system shall be visually inspected monthly and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964, Subpart RR, except:

(i) The permittee shall comply with the recordkeeping requirements of 40 CFR 63.454, Subpart S instead of the requirements specified in 40 CFR 63.964(a)(1)(vi) and (b)(3), Subpart RR.

(ii) Owners or operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in 40 CFR 63.453(a) and (k); Subpart S, instead of the requirements specified in 40 CFR 63.964(a)(2), Subpart RR.

(Ref.: 40 CFR 63.453(l)(1), Subpart S)

(d) For Emission Point AA-208, each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in § 63.446(d)(2)(i), Subpart S measured initially and annually, thereafter, by the procedures specified in 40 CFR 63.457(d), Subpart S.

(Ref.: 40 CFR 63.453(1)(2), Subpart S)

(e) For Emission Point AA-208, if an inspection required by 40 CFR 63.453(l), Subpart S identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured; then corrective actions specified in 40 CFR 63.964(b), Subpart RR shall be taken.

(Ref.: 40 CFR 453(l)(3), Subpart S)

5.B.9 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-301

For Emission Point AA-301, the permittee shall monitor the emissions of particulate matter less than 2.5 microns ($PM_{2.5}$) that could increase as a result of the "No. 1 Paper Machine improvement" and "No. 2 Paper Machine improvement" projects submitted to the MDEQ on November 4, 2014, and March 18, 2014, respectively. The permittee shall calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis for a period of five (5) years following resumption of regular operations after the change in accordance with 40 CFR 52.21(r)(6)(iii), Subpart A.

This requirement would be satisfied in 2020 for the No. 1 Paper Machine Project and in 2019 for the No. 2 Paper Machine Project. The permittee shall submit a report to the DEQ if the annual emissions, in tons per year, exceed the baseline actual emissions by a significant amount, and if such emissions differ from the preconstruction projection. This report shall contain the information outlined in 40 CFR 52.21(r)(6)(v), Subpart A and shall be submitted within 60 days after the end of each year.

The permittee shall make the information required to be documented and maintained pursuant to 40 CFR 52.21(r)(6) available for review upon a request for inspection by the MDEQ or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii).

(Ref.: 40 CFR 52.21(r)(6), Subpart A)

5.B.10 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-302

For Emission Point AA-302, the permittee shall maintain records of the throughput of Air Dried Secondary Pulp in tons per day (as a rolling 365-day average calculated daily) and tons per year (as a rolling 365-day total calculated daily).

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

5.B.11 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-401, AA-402, AA-405, AA-406, and AA-501

(a) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the facility must conduct an initial performance test and periodic performance tests for HAP metals using the test methods and procedures listed in 40 CFR 63.7; Subpart A, and 63.865(b); Subpart MM, and Condition 5.B.1. The permittee must conduct the first of the periodic performance tests by October 13, 2020, and within 5 years following

the previous performance test thereafter. Performance tests shall be conducted based on representative performance (i.e. performance based on normal operating conditions) of the affected source for the period being tested. Representative conditions exclude periods of start-up and shutdown.

The permittee may not conduct performance tests during periods of malfunction. The permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support such conditions represent normal operation. Upon request the permittee shall make available to the MDEQ such records as may be necessary to determine the conditions of performance tests. The permittee seeking to comply with the emission limit under 40 CFR 63.862(a)(1)(ii)(A), Subpart MM must use the procedures in 63.865(a)(1) and (2), Subpart MM.

(Ref.: 40 CFR 63.865, Subpart MM)

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

(b) For Emission Points AA-405, AA-406, and AA-501, during the initial performance test for HAP Metals (as specified in Condition 5.B.11), the permittee must establish operating ranges for the monitoring parameters specified in 40 CFR 63.864(e)(10), (13), or (14), Subpart MM; or

(1) The permittee may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required by MACT – Subpart MM. The permittee must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained.

(2) The permittee may establish expanded or replacement operating ranges for the monitoring parameter values specified in 40 CFR 63.864(e)(10), (13), or (14); Subpart MM, and established in accordance with 40 CFR 63.864(j), Subpart MM during subsequent performance tests using the test methods set forth in 40 CFR 63.865, Subpart MM.

(Ref.: 40 CFR 63.864(j), Subpart MM)

(c) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee must maintain records of any occurrence when corrective action is required under 40 CFR 63.864(k)(1)(i) and (ii), Subpart MM and when a violation is noted under 40 CFR 63.864(k)(2)(i) and (iii), Subpart MM. The following conditions shall be considered violations:

(1) For an existing Kraft recovery furnace equipped with an ESP, when spent liquor is being fed, when opacity is greater than 35% for six (6) percent or more of the operating time within any quarterly period;

On and after October 11, 2019, during periods when spent liquor is fed, excess opacity emissions shall not exceed 35% for two (2) percent or more of the operating time within any semi-annual period.

(2) For an existing Kraft smelt dissolving tank or Kraft lime kiln equipped with a wet scrubber, when six or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established in accordance with 40 CFR 63.864(b)(2), Subpart MM.

(Ref.: 40 CFR 63.864(c)(i) and (iii), Subpart MM)

(d) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee must maintain the general records required by 40 CFR 63.10(b)(2)(iii), (vi), and (vii) – (xiv), Subpart A plus the following parametric monitoring data:

(1) Records of the parameter monitoring data required under 40 CFR 63.864; Subpart MM including the following information:

(i) Any period when the operating parameter levels were inconsistent with the levels established during the initial or the most recent performance test;

(ii) A brief explanation of the cause of the deviation;

(iii) The time the deviation occurred;

(iv) The time corrective action was initiated and completed; and

(v) The corrective action taken;

(2) All records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865 (a) through (e); and

(3) Records of any monitoring parameter ranges established for each affected source or process unit.

(Ref.: 40 CFR 63.866(b), Subpart MM)

(e) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the Smelt Dissolving Tank(s) Scrubber(s) and the Lime Kiln Scrubber, the permittee shall install, maintain, operate, and calibrate a CMS to monitor and record the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(e)(10). The monitoring device must be certified by the manufacturer to an accuracy of ±5 percent of the design scrubbing liquid flow rate. The monitoring device should be calibrated in accordance with the manufacturer's specifications.

(Ref.: 40 CFR 63.864(e)(10), Subpart MM)

(f) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the Smelt Dissolving Tank(s) Scrubber(s) and the Lime Kiln Scrubber, the permittee shall install, maintain, operate, and calibrate a CMS to determine and record the pressure drop across the scrubber at least once every successive 15-minute period using the

procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(a)(2)(i). The monitoring device must be certified, by the manufacturer, to an accuracy of ±2 inches water gage pressure (±500 Pascal's).

(Ref.: 40 CFR 63.864(a)(2), Subpart MM)

(g) On and after October 11, 2019, the following requirements must be met:

(1) In the event that an affected unit fails to meet an applicable standard, including any emission limit in 40 CFR 63.862; Subpart MM or any opacity or CPMS operating limit in 40 CFR 63.864; Subpart MM, record the number of failures. For each failure record the date, start time, and duration of each failure;

(2) For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, and the following information:

(i) For any failure to meet an emission limit in 40 CFR 63.862; Subpart MM, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.

(ii) For each failure to meet an operating limit in 40 CFR 63.864; Subpart MM, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the MDEQ.

(3) Record actions taken to minimize emissions in accordance with 40 CFR 63.860(d), Subpart MM and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(Ref.: 40 CFR 63.866(d), Subpart MM)

5.B.12 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-401 and AA-402

(a) For Emission Points AA-401 and AA-402, the permittee shall conduct biennial performance testing as determined by the timing of initial test conducted prior to December 31, 2003 for the following parameters in accordance with the test methods specified and Condition 5.B.1(c):

(1) Particulate Matter (PM): 40 CFR Part 60, Appendix A, EPA Test Methods 1 – 5;

(2) Sulfur Dioxides (SO_2): 40 CFR Part 60, Appendix A, EPA Test Method 8;

(3) Total Reduced Sulfur (TRS): 40 CFR Part 60, Appendix A, EPA Test Method 16, 16A, or 16C;

(4) Nitrogen Oxides (NO_X): 40 CFR Part 60, Appendix A, EPA Test Method 7;

(5) Carbon Monoxide (CO): 40 CFR Part 60, Appendix A, EPA Test Method 10;

(6) Opacity: Continuous Emission Monitor

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

(b) For Emission Points AA-401 and AA-402, the permittee shall perform weekly inspections, and as necessary, perform corrective maintenance on the two (2) recovery furnace electrostatic precipitators to assure their performance achieves compliance with the terms and conditions of this permit. Specifically, the permittee must verify that the individual recovery furnace electrostatic precipitators have the proper voltage and current supply to all fields. All records of inspections and maintenance shall be kept in log form in accordance with Condition 5.A.3.

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

(c) For Emission Points AA-401 and AA-402, the permittee shall maintain an Operation and Maintenance (O & M) Plan for the ESP control device. The O & M Plan should be maintained on-site in accordance with Condition 5.A.3. The plan should include, but is not limited to the following information:

(1) An operational checklist (i.e. number of fields energized, minimum voltage level);

(2) Operational procedures;

(3) Documentation of maintenance schedules and maintenance activity performed;

(4) The permittee shall maintain records of any operational and/or maintenance activities associated with the ESP's O&M plan in accordance with Condition 5.A.3. All records shall be made available upon request by MDEQ personnel.

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

(d) For Emission Points AA-401 and AA-402, the permittee shall monitor the oxygen concentration in the furnace(s) flue gas continuously by a device which meets the requirements of 40 CFR Part 60 – Performance Specification 3.

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

(e) For Emission Points AA-401 and AA-402, the permittee shall monitor the TRS concentration in the furnace(s) flue gas by performance of EPA Method 16, 16A, or 16C on a quarterly basis. Each successive quarter's testing shall be separated from the previous quarter by a period of not less than sixty (60) days and prior notice to the MDEQ of all testing shall be made.

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

(f) For Emission Points AA-401 and AA-402, the permittee shall calculate and record, on a daily basis, the 12-hour average O_2 concentration for the two consecutive operating periods of each operating day for both recovery furnaces (if continuously monitored). Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 continuous 1-hour average concentrations.

(Ref. 11 Miss. Admin. Code Pt. 2, R. 1.4.B(6).)

(g) For Emission Points AA-401 and AA-402, the permittee shall record and maintain records of the black liquor solids (BLS) firing rate in tons per day (or megagrams per day) daily.

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

(Ref.: 40 CFR 63.866(c)(1), Subpart MM)

(h) For Emission Points AA-401 and AA-402, the permittee must install, maintain, operate, and calibrate a CMS for the recovery furnace to record the opacity of the gases discharged into the atmosphere at least once every successive 10-second period. The permittee must also calculate and record each successive 6-minute average opacity, using the procedures set forth in 40 CFR 63.6(h) and 40 CFR 63.8, Subpart A.

(Ref.: 40 CFR 63.864(a)(1), Subpart MM)

(i) For Emission Point AA-401 and AA-402, the permittee shall maintain records of the hours of incineration of NCG gases, on both a daily and an annual (calendar year) basis.

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

(j) On and after October 11, 2019, the permittee shall maintain records demonstrating compliance with the requirement in 63.864(e)(1) to maintain proper operation of an ESP's automatic voltage control (AVC).

(Ref.: 40 CFR 63.866(c)(8), Subpart MM)

5.B.13 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-403

(a) For Emission Point AA-403, the permittee shall conduct biennial performance testing determined by timing of initial test conducted prior to December 31, 2003 (except as otherwise specified) for the following parameters in accordance with the test methods specified below and Condition 5.B.1(c):

(1) Particulate Matter (PM): 40 CFR Part 60, Appendix A, EPA Test Methods 1 – 5;

(2) Sulfur Dioxides (SO_2): 40 CFR Part 60, Appendix A, EPA Test Method 8;

(3) Nitrogen Oxides (NO_X): 40 CFR Part 60, Appendix A, EPA Test Method 7;

(4) Carbon Monoxide (CO): 40 CFR Part 60, Appendix A, EPA Test Method 10;

(5) Volatile Organic Compounds (VOCs): 40 CFR Part 60, Appendix A, EPA Test Method 25 or 25A;

(6) Sulfuric Acid Mist (H_2SO_4): 40 CFR Part 60, Appendix A, EPA Test Method 8 (The testing shall be conducted once per the life of the permit for sulfuric acid mist); and

(7) Opacity: Continuous Emission Monitor.

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

(b) For Emission Point AA-403, the permittee shall maintain records of the monthly usage rates of amount of tire derived fuel (TDF), other solid fuels [old corrugated container (OCC) rejects, waste water treatment system (WWTS) sludge, wood and bark combined, and plywood residuals], and natural gas based on a 12-month rolling total. The permittee shall maintain the records in accordance with Condition 5.A.3.

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

(c) For Emission Point AA-403, the permittee shall maintain records of the total fuel feed rate (in tons per day) to the boiler monthly and the percentage of TDF in the total feed rate to the boiler monthly and annually. The permittee shall maintain records in accordance with Condition 5.A.3.

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

(d) For Emission Point AA-403, the permittee shall perform continuous emission monitoring of Opacity and maintain records of the opacity readings. The monitors shall be operated in accordance with 40 CFR Part 60, Appendix B – Performance Specification 1. The permittee shall maintain records in accordance with Condition 5.A.3.

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

(f) For Emission Point AA-403, the permittee shall perform weekly inspections, and as necessary, perform corrective maintenance on the combination boiler electrostatic precipitators to assure that the performance achieves compliance with the terms and conditions of this permit.

Specifically, the permittee must verify that the boiler's ESP control devices have the proper voltage and current supply to all fields. All records of inspections and maintenance shall be kept in log form in accordance with Condition 5.A.3.

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

(f) For Emission Point AA-403, the permittee shall maintain an Operation and Maintenance (O & M) Plan for the ESP control devices. The O & M Plan should be maintained on-site in accordance with Requirement 5.A.3. The plan should include (but is not limited to) the following information:

(1) An operational checklist (i.e. number of fields energized, minimum voltage level);

(2) Operational procedures;

(3) Documentation of maintenance schedules and maintenance activity performed;

(4) The permittee shall maintain records of any operational and/or maintenance activities associated with the ESP's O&M plan in accordance with Condition 5.A.3 of this document. All records shall be made available to MDEQ personnel upon request.

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

(g) For Emission Point AA-403, the permittee shall demonstrate compliance with the applicable emission limits in Condition 3.B.17(k) using performance stack testing, fuel analysis, or continuous monitoring systems (CMS) in accordance with 40 CFR 63.7505, Subpart DDDDD. Subsequent annual performance tests shall be conducted in accordance with 40 CFR 63.7515 and 63.7520, Subpart DDDDD. Annual performance tests must be completed no more than 13 months after the previous performance test, except as specified in 40 CFR 63.7515(b) – (e), (g), and (h), Subpart DDDDD.

(Ref.: 40 CFR 63.7505, 63.7510, 63.7515, and 63.7530, Subpart DDDDD)

(h) For Emission Point AA-403, the permittee shall conduct all applicable monitoring, installation, operation, and maintenance requirements in accordance with 40 CFR 63.7525, Subpart DDDDD.

(Ref.: 40 CFR 63.7525, Subpart DDDDD)

(i) For Emission Point AA-403, the permittee shall demonstrate continuous compliance with all applicable emission limits, fuel specifications and work practice standards in accordance with 40 CFR 63.7540 and 63.7541, Subpart DDDDD.

(Ref.: 40 CFR 63.7540 and 63.7541, Subpart DDDDD)

(j) For Emission Point AA-403, the permittee shall keep all applicable records according to 40 CFR 63.7555, Subpart DDDDD. Records must be kept in a form suitable and ready for expeditious review and for the length of time according to 40 CFR 63.10(b)(1), Subpart A.

(Ref.: 40 CFR 63.7555 and 63.7565, Subpart DDDDD)

5.B.14 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-404

(a) For Emission Point AA-404, the permittee shall conduct biennial performance testing as determined by timing of initial test conducted prior to December 31, 2003 for the following parameters in accordance with the test methods specified below and Condition 5.B.1(c):

(1) Nitrogen Oxides (NO_x): 40 CFR Part 60, Appendix A, EPA Test Method 7;

(2) Carbon Monoxide (CO): 40 CFR Part 60, Appendix A, EPA Test Method 10;

(3) Opacity: Continuous Emission Monitor.

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

(b) For Emission Point AA-404, the permittee shall maintain monthly records of the consumption of natural gas.

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

(c) For Emission Point AA-404, the permittee shall perform continuous emission monitoring of opacity and maintain records of the opacity readings. The monitors shall be operated in accordance with 40 CFR 60, Appendix B – Performance Specification 1. The permittee shall maintain records in accordance with Condition 5.A.3.

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

(d) For Emission Point AA-404, the permittee shall monitor the NOx emissions as a result of the project for increasing the steam production in the No. 1 Turbine Generator Set submitted to MDEQ on March 07, 2019. The permittee shall calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis for a period of five (5) years following resumption of regular operations after the change in accordance with 40 CFR 52.21(r)(6)(iii). This requirement would be satisfied in 2024.

The permittee shall submit a report to the MDEQ if the annual emissions, in tons per year, exceed the baseline actual emissions by a significant amount, and if such emissions differ from the preconstruction projection. This report shall contain the information outlined in 40 CFR 52.21(r)(6)(v) and shall be submitted within 60 days after the end of each year.

The permittee shall make the information required to be documented and maintained pursuant to 40 CFR 52.21(r)(6) available for review upon a request for inspection by the MDEQ or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii).

(Ref.: 40 CFR 52.21(r)(6), Subpart A)

5.B.15 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-405 and AA-406

(a) For Emission Points AA-405 and AA-406, the permittee shall conduct biennial performance testing as determined by timing of initial test conducted prior to December 31, 2003 for the following parameters in accordance with the test methods specified below and Condition 5.B.1(c):

(1) Particulate Matter (PM and PM_{10}): 40 CFR Part 60, Appendix A, EPA Test Methods 1 – 5;

(2) Sulfur Dioxides (SO_2): 40 CFR Part 60, Appendix A, EPA Test Method 6;

(3) Total Reduced Sulfur (TRS): 40 CFR Part 60, Appendix A, EPA Test Method 16 or 16A.

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

(b) For Emission Points AA-405 and AA-406, the permittee shall perform weekly inspections, and as necessary, perform corrective maintenance on the four (4) smelt dissolving tanks to assure their performance achieves compliance with the terms and conditions of this permit. All records of inspections and maintenance shall be kept in log form in accordance with Condition 5.A.3.

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

(c) For Emission Points AA-405 and AA-406, the permittee shall maintain measuring devices as are necessary for the continuous monitoring and/or measurement of the following smelt tank scrubber parameters:

(1) Monitor and record the scrubbing liquid flow rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 63.864(e)(10). The monitoring device must be accurate to within +/- 5 percent of the design scrubbing liquid flow rate.

(2) Monitor and record the pressure drop utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c), Subpart A and 40 CFR 63.864(e)(10), Subpart MM. The monitoring device must be accurate to within a gage pressure of +/- 500 pascals (+/- 2 inches of water gage pressure).

(Ref.: 40 CFR 63.864(e)(10), Subpart MM)

5.B.16 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-501

(a) For Emission Point AA-501, the permittee shall conduct biennial performance testing as determined by timing of the initial test conducted prior to December 31, 2005 for the following parameters in accordance with the test methods specified below and Condition 5.B.1(c):

(1) Particulate Matter (PM): 40 CFR Part 60, Appendix A, EPA Test Methods 1 – 5;

(2) Sulfur Dioxides (SO_2): 40 CFR Part 60, Appendix A, EPA Test Method 6;

(3) Total Reduced Sulfur (TRS): Continuous Emission Monitoring;

(4) Nitrogen Oxides (NO_x): 40 CFR Part 60, Appendix A, EPA Test Method 7;

(5) Carbon Monoxide (CO): 40 CFR Part 60, Appendix A, EPA Test Method 10;

(6) Opacity: 40 CFR Part 60, Appendix A, EPA Test Method 9;

(7) Sulfuric Acid Mist, 40 CFR Part 60, Appendix A, EPA Test Method 8.

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

(b) For Emission Point AA-501, the permittee shall perform weekly inspections of the Lime Kiln Scrubber, and perform corrective maintenance as necessary to ensure compliance with all the applicable terms and conditions set forth in the federally enforceable permit to construct issued on March 14, 2000 and modified on January 12, 2001. The inspection shall include verification of the venturi scrubber pressure drop, and the scrubber liquid flow rate. bAll records of inspections and maintenance shall be kept in log form in accordance with Condition 5.A.3.

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

(c) For Emission Point AA-501, maintain records of the hours of incineration of NCG gases, on both a daily and an annual (calendar year) basis.

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

(d) For Emission Point AA-501, record the CaO production rate in tons per day (or megagrams per day).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)
(Ref.: 40 CFR 63.866(c)(2), Subpart MM)

(e) For Emission Point AA-501, the permittee shall monitor the oxygen concentration in the Lime Kiln flue gas continuously in accordance with 40 CFR Part 60, Appendix B – Performance Specification 3.

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

(f) For Emission Point AA-501, the permittee shall monitor the TRS concentration in the lime kiln flue gas continuously in accordance with 40 CFR Part 60, Appendix B – Performance Specification 5. Instrument accuracy must be verified at least once every five (5) years as well as any time there is cause to question instrument reliability.

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

(g) For Emission Point AA-501, the permittee shall calculate and record (on a daily basis) the 12-hour average TRS and O_2 concentrations for the two (2) consecutive operating periods of each operating day (based on the standard operating day from 7:00 A.M. to 7:00 A.M.). Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 continuous 1-hour average concentrations. Each 12-hour average TRS concentration shall be corrected to 10% O_2 using the equation defined in 40 CFR 60.284(c)(3), Subpart BB. CEM accuracy verification for the TRS / O_2 CEMs is to be performed no less than once every 5 years as well as any time there is cause to question CEM reliability.

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

(h) For Emission Point AA-501, the permittee shall maintain measuring devices as are necessary for the continuous monitoring and/or measurement of the following lime kiln scrubber parameters:

(1) Monitor and record the scrubbing liquid flow rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c), Subpart A and 63.864(e)(10), Subpart MM. The monitoring device must be accurate to within +/- 5 percent of the design scrubbing liquid flow rate.

(2) Monitor and record the pressure drop utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c), Subpart A and 40 CFR 63.864(e)(10), Subpart MM. The monitoring device must be accurate to within a gage pressure of +/- 500 pascals (+/- 2 inches of water gage pressure).

(Ref.: 40 CFR 63.864(e)(10), Subpart MM)

(i) For Emission Point AA-501, the permittee shall submit a minimum pH for the caustic scrubber liquid, which provides compliance assurance with the SO_2 emissions limitations for the Lime Kiln. The minimum pH shall be established using the correlation of pH monitoring collected during the performance test required in this permit. The chosen pH minimum value and supporting correlation data shall be submitted to the MDEQ on an annual basis within 60 days of conducting the performance test required in this permit.

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

(j) For Emission Point AA-501, the permittee shall monitor and record the scrubbing liquid pH on a once per shift basis when pet coke is fired in the unit. All records shall be kept in accordance with Condition 5.A.3.

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

5.B.17 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-401, AA-402 AND AA-501

(a) For Emission Points AA-401, AA-402 AND AA-501, the permittee shall maintain records of the following:

(1) Periods when either the Lime Kiln or the Recovery Furnaces serve as the primary control device for LVHC waste streams;

(2) Periods when the Recovery Furnaces and the Lime Kiln are all out-of-service and the LVHC waste streams are vented directly to the atmosphere;

Such records shall include the date, time, duration, and operating conditions under which the scenario occurred. All records shall be kept in accordance with Condition 5.A.3. The permittee shall report these records to the MDEQ on a quarterly basis. These reports shall be submitted within twenty (20) days following the end of the reporting period.

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

(b) For Emission Points AA-401, AA-402, and AA-501, the permittee shall maintain daily records of maintenance and upsets. The items to be recorded include (but are

not limited) to the following:

(1) The date, time, and details of scheduled outages and excess emissions of any equipment during the outage or upon restart of the equipment;

(2) The loss of function of any control device;

(3) The occurrence of any extreme increases and/or decreases in the loading to a control device not otherwise caused by an outage as referenced in item (a) above;

(4) All routine inspections, any maintenance performed, and the determination of the cause of an upset in operations.

All records shall be kept in accordance with Condition 5.A.3.

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

5.B.18 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-405, AA-406, and AA-501

For Emission Points AA-405, AA-406, and AA-501, the permittee is subject to and shall comply with 40 CFR Part 64, Compliance Assurance Monitoring. The permittee shall comply with the CAM Plan contained in Appendix C. In addition, the permittee shall conduct monitoring and fulfill all other obligations specified in 40 CFR Parts 64.7 through 64.9. For each excursion, the permittee shall document the event and the corrective action taken.

(Ref.: 40 CFR Part 64.2)

5.B.19 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-519

(a) For Emission Point AA-519, the permittee shall perform visible emission observations during truck unloading once per month and maintain a log of the results. If conditions are such that visible emissions are observed during that time period, then the permittee shall perform an EPA Method 9 test. If conditions are such that readings cannot be taken using evaluations of Method 9, the permittee shall note these conditions in the record and provide an explanation of why it was not possible to perform opacity readings/observations. If no truck unloading operations occur during a month, the permittee shall make note of this in the log.

(b) For Emission Point AA-519, inspections shall be performed each month when the baghouse is in operation, or more often as needed, and maintenance shall be performed as dictated by inspection results so that proper operation of the baghouse is maintained. Records of any inspections and/or maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by MDEQ personnel.

(c) For Emission Point AA-519, the permittee shall maintain access at all times to sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the

permittee shall be subject to the provisions established in Condition 1.24 with respect to upsets, startups, shutdowns, and maintenance.

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

5.B.20 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-703

(a) For Emission Point AA-703, the permittee shall comply with the following monitoring, operating, and maintenance requirements:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;

(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first;

(4) Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;

(5) The permittee must install a non-resettable hour meter; if one is not already installed;

(6) The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty (30) minutes;

(7) The permittee may utilize an oil analysis program in order to extend the specified oil change requirements from Condition 3.B.23(a)(1) provided the analysis analyzes the parameters identified in 63.6625(i), Subpart ZZZZ.

(Ref.: 40 CFR 63.6602, 63.6625(e), (f), (i), and 63.6640(a), Subpart ZZZZ)

(b) For Emission Point AA-703, the permittee shall operate the engine according to the following:

(1) There is no time limit on the use of the engine during an emergency situation;

(2) The engine may be operated for the purpose of maintenance checks and readiness testing in accordance with vendor, manufacturer, State or Federal recommendations. Such testing is limited to one hundred (100) hours per year;

(3) The engine may be operated up to fifty (50) hours per year in non-emergency situations. However, those 50 hours count towards the 100 hour limit in paragraph (2) above. The 50 hours per year for non-emergency operations cannot be used for the power usage provisions outlined in 63.6640(f)(1)(iii), Subpart ZZZZ.

Any operation other than what is provided for in paragraphs (1) – (3) above is prohibited.

(Ref.: 40 CFR 63.6640(f)(1)(i through iii), Subpart ZZZZ)

(c) For Emission Point AA-703, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:

(1) All maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in Condition 5.B.19(a);

(2) The hours of operation of the engine recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operations, including what classified the event as an emergency, and how many hours are spent for non-emergency operation.

(Ref.: 40 CFR 63.6640(a), 63.6655(e), (f), and 63.6660(b), (c), Subpart ZZZZ)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.2	Upsets	Report by telephone, electronic communication, or facsimile within 24-hours of the occurrence, any upsets in excess of (4) hours, which cause or appear to cause an exceedance of emissions limitations. The report must include the estimated duration of the upset.
AA-201	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.3(a)	Production	Submit records of the maximum rolling 365-day average Air Dried Virgin Pulp throughput in tons per day during the reporting period in accordance with Condition 5.A.4
	40 CFR 52.21, Subpart A	5.C.3(b)	$PM_{2.5}$	Submit a report if annual emissions (in tons per calendar year) from the APC project exceed the baseline actual emissions. This requirement would be satisfied in the year 2022.
AA-203	40 CFR 60.284(d) & (e), Subpart BB	5.C.4	TRS, or Combustion Temperature	Submit a semi-annual report of any periods of excess emissions that occurred as indicated in 40 CFR 60.284(d)(3), Subpart BB. Each excess emission report shall include the information required in 40 CFR 60.7(c), Subpart A.
AA-206 AA-207 AA-208	40 CFR 63.455(a), Subpart S	5.C.5(a)	HAPs	Submit all applicable notifications from 40 CFR 63, Subpart A as detailed in 40 CFR 63.440 – Table 1, Subpart S. (See Appendix C of this permit)
AA-206 AA-208	40 CFR 63.454, Subpart S; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5(b)	Site-Specific Inspection Plan	Submit a semi-annual report of compliance with the site-specific inspection plan including a summary of the information specified in Condition 3.D.4.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5(c)	Corrective Actions	Submit a semi-annual report of any corrective action(s), violation, and/or maintenance required as detailed in Condition 5.B.6.
	40 CFR 63.453, Subpart S 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5(d)	CMS and/or Control Device	Submit a semi-annual excess emissions report. Each excess emission report shall include the information required in 40 CFR 63, Subpart A – General Provisions. Periods of excess emissions allowed by Conditions 3.B.12(c) and 3.B.13(d) are not considered deviations which require submittal of deviation reporting as required in Condition 5.A.5.
	40 CFR 63.453(k), Subpart S 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5(e)	Enclosures and Closed Vent Systems	Submit a semi-annual report of compliance with the requirements set forth in Conditions 5.B.5, 5.B.6, and 5.B.8.
	40 CFR 63.457(a), Subpart S 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	HAPs	Submit all pretest notifications, an initial compliance test report, and all applicable annual or biennial reports thereafter.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-208	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5(f)	Condensate Collection System	Submit a semiannual report of compliance with the requirements set forth in Condition 5.B.8(d) and (e).
AA-302	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.6	Pulp Production Rate	Submit the records of the maximum rolling 365-day average Air Dried Secondary Pulp throughput in tons per day during the reporting period in accordance with Condition 5.A.4.
AA-401 AA-402 AA-405 AA-406 AA-501	40 CFR 63.864(j), Subpart MM 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.7(a)	HAP Metals	Submit report of the operating ranges for any monitoring parameters determined during the Initial Compliance Test. Expanded or replacement operating ranges for the monitoring parameter values may be reset during subsequent performance tests.
	40 CFR 63.867(a), Subpart MM	5.C.7(b)	HAPs	Submit all applicable notifications from 40 CFR Part 63, Subpart A as detailed in 40 CFR 63.860 – Table 1, Subpart MM.
	40 CFR 63.867(c), Subpart MM	5.C.7(c)	Excess Emissions	Submit semi-annual excess emissions reports Periods of excess emissions allowed by Conditions 3.B.16(a) and 3.B.20(a) are not considered deviations which require submittal of deviation reporting as required in Condition 5.A.5 or 1.25(a)(1)(iv).
	40 CFR 63.863(c)(2) and 63.867(d)(1), Subpart MM	5.C.7(d)	PM Stack Testing Reporting	The date to submit performance test data through the CEDRI is within 60 days after the date of completing each performance test. The permittee must upload an electronic copy of each stack test reporting for testing required after October 11, 2019.
	40 CFR 63.867(d)(2), (3), and (4), Subpart MM	5.C.7(e)	Electronic Reporting	Submit the notifications required in 63.9(b) and 63.9(h), Subpart A [including any information specified in 5.C.7(d)] and semi-annual reports to the EPA via the CEDRI. The permittee mush upload an electronic copy of each notification in CEDRI beginning with any notification specified in Condition 5.C.7 that is required after October 11, 2019.
AA-401 AA-402	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).	5.C.1	PM/PM_{10} SO_2 NO_X CO TRS Opacity	Pretest notifications and stack test report
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.8(a)	O_2	Submit semi-annual records of the O_2 concentration in the furnace(s) flue gas and the 12-hour average O_2 concentration for the two (2) consecutive operating periods of each operating day for both recovery furnace(s).

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-402 AA-403	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.C.8(b)	TRS	The permittee shall submit records of the test results of TRS concentration in the furnace(s) flue gas by performance of EPA Method 16, 16A, or 16C on a quarterly basis. Each quarterly testing shall be submitted within thirty (30) days following the end of each calendar quarter.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.8(c)	Non-Condensable Gases	Submit semi-annual records of the hours of incineration of NCGs in the recovery furnaces based on a 365-day rolling total.
AA-403	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).	5.C.1	PM / PM_{10} SO_2 NO_X CO VOCs Sulfuric Acid Mist Opacity	Pretest notifications and stack test report
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.9(a)	Fuel Usage	Submit a semi-annual report summarizing the amount(s) and type(s) of fuels combusted as specified in Condition 5.B.13(b) for the preceding 6-month period in accordance with Condition 5.A.4. The feed rates and percentages should be provided as 12-month rolling totals for each month in the preceding 6-month reporting period.
		5.C.9(b)	Opacity	Submit a semi-annual summary of opacity monitor records maintained in Condition 5.B.13(d).
		5.C.9(c)	Inspections and/or Maintenance	Submit a semi-annual summary of the weekly inspections and/or maintenance conducted in accordance with 5.B.13(g) and (h).
	40 CFR 63.9(h)(2)(ii), Subpart A	5.C.9(d)	HAPs	Notification of Compliance Status
	40 CFR 63.7545(e), Subpart DDDDD	5.C.9(e)		Submit all applicable compliance reports in accordance with 40 CFR 63.7550, Subpart DDDDD.
AA-404	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).	5.C.1	NO_X CO Opacity	Pretest notifications and Stack test report
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.10(a)	Fuel Consumption	Submit a semi-annual report of the monthly natural gas throughputs during the reporting period as specified in Condition 5.B.14(b).

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-404	40 CFR 63.9 (h)(2)(ii), Subpart A 40 CFR 63.7545(e) and 63.7550, Subpart DDDDD	5.C.10(b)	HAPs	Submit all applicable compliance reports in accordance with 40 CFR 63.7550, Subpart DDDDD.
AA-405 AA-406	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).	5.C.1	PM / PM_{10} SO_2 TRS	Pretest notifications and stack test report
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.11(a)	Inspections and/or Maintenance	Submit a semi-annual summary of the weekly inspections and/or maintenance conducted in accordance with Condition 5.B.15(b).
	40 CFR 63.864(a)(2), Subpart MM	5.C.11(b)	Scrubber Parameters	Submit a semi-annual monitoring system performance report including scrubbing liquid flow rate and pressure drop.
AA-501	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).	5.C.1	PM / PM_{10} SO_2 NO_x CO Sulfuric Acid Mist Opacity	Pretest notifications and stack test report
	40 CFR 60.284(d) and (e), Subpart S	5.C.12(a)	TRS O_2	Submit quarterly reports of the Lime Kiln CEMs monitoring data for TRS and oxygen.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.12(b)	TRS O_2	Submit records of the O_2 concentration in the flue gas, the TRS concentration in the flue gas, and the 12-hour average TRS and O_2 concentration for the two (2) consecutive operating periods of each operating day for the lime kiln.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.12(c)	Non-Condensable Gases	Submit semi-annual records of the hours of incineration of NCGs based on a 365-day rolling total.
		5.C.12(d)	Inspections and/or Maintenance	Submit a semi-annual summary of the weekly inspections and/or maintenance conducted in accordance with Condition 5.B.16(b).
	40 CFR 63.864 and 63.866, Subpart MM	5.C.12(e)	Scrubber Parameters	Submit a semi-annual monitoring system performance report including a summary of the average scrubbing liquid supply pressure and the pressure loss across the scrubber.
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.12(f)	Scrubber Parameters	Submit a semi-annual monitoring report including a summary of the scrubbing liquid pH that is collected on a once per shift basis. Per Condition 5.B.16(j), monitoring and recordkeeping is only required when pet coke is being fired.

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-519	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.13	Opacity	Submit a semi-annual summary of the monthly opacity observations conducted in accordance with Condition 5.B.18.
AA-703 AA-704	40 CFR 63.7550, Subpart DDDDD	5.C.14	HAPs	Submit all applicable compliance reports in accordance with 40 CFR 63.7550, Subpart DDDDD.

5.C.1 STACK TEST REPORTING AND PRE-TEST PROTOCOLS

The permittee shall submit the following notifications, information, and reports for each required performance test on or before the date(s) specified in Section 5.B:

(a) For MACT subject emission sources, a notification of the intent to conduct a performance test must be submitted to the MDEQ sixty (60) calendar days prior to the intended test date or as otherwise specified in 40 CFR 63.7(b), Subpart A and the applicable subpart. For all other emissions sources, a notification of the scheduled test date(s) should 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).

(b) For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ. For emission sources subject to a MACT standard, the test plan must meet the requirements of 40 CFR 63.7(c)(2), Subpart A.

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

(d) The permittee shall submit the results of all required emissions testing in the units specified by the limitations set forth in section 3.B of this document. For VOC emissions testing conducted in accordance with EPA Reference methods 25 or 25A, the permittee must convert the emissions results, measured "as carbon" to the equivalent standard as VOC emissions.

(e) The permittee shall submit the results (in summary) of any periodic and/or parametric monitoring required in Condition 5.B.1.

(f) The performance test results must be submitted to the MDEQ within sixty (60) days following completion of the performance test.

(g) Special Testing Requirements:

(1) For Emission Points AA-401 and AA-402, report the average black liquor solids firing rate during each performance test.

(2) For Emission Point AA-404, report the maximum average fuel-firing rate during testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(5) and (6).)

5.C.2 REPORTING REQUIREMENTS FOR THE ENTIRE FACILITY

The permittee shall report by telephone, electronic communication, or facsimile within 24-hours of the occurrence, any upsets in excess of (4) hours, which cause or appear to cause an exceedance of emissions limitations. The report must include the estimated duration of the upset.

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

5.C.3 REPORTING REQUIREMENTS FOR EMISSION POINT AA-201

(a) For Emission Point AA-201, the permittee shall submit records of the maximum rolling 365-day average Air Dried Virgin Pulp throughput in tons per day during the reporting period, in accordance with Condition 5.A.4.

(b) For Emission Point AA-201, the permittee shall submit a report to MDEQ if the annual emissions of particulate matter less than 2.5 microns ($PM_{2.5}$), in tons per calendar year, from the APC project [as documented and maintained pursuant to Condition 5.B.3(b)] exceed the baseline actual emissions by a significant amount for any regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented in the associated document. The report shall be submitted to the MDEQ within 60 days after the end of such calendar year. This requirement would be satisfied in the year 2022. The report shall contain the following:

(1) The name, address and telephone number of the Mill;

(2) The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii); and

(3) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emission differ from the preconstruction projection).

(Ref.: 40 CFR 52.21(r)(6), Subpart A)

5.C.4 REPORTING REQUIREMENTS FOR EMISSION POINT AA-203

For Emission Point AA-203, the permittee shall submit a semiannual report of any periods of excess emissions that occurred as indicated in 40 CFR 60.284(d)(3) in accordance with Condition 5.A.4 for the most recent semiannual period, except where the provisions of 40 CFR 60.283(a)(1)(i), (ii), or (iv), Subpart BB apply.

Each excess emission report shall include the information required in 40 CFR 60.7(c), Subpart A. Periods of excess emissions will not be considered indicative of a violation of 40 CFR 60.11(d), Subpart A provided that the facility can demonstrate to the MDEQ that the affected facility (including air pollution control equipment) is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

(Ref.: 40 CFR 60.284(d) and (e), Subpart BB)

5.C.5 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-206, AA-207, and AA-208

(a) For Emission Points AA-206, AA-207, and AA-208, the permittee shall submit all applicable notifications from 40 CFR Part 63, Subpart A as detailed in 40 CFR 63.440 – Table 1, Subpart S.

(Ref.: 40 CFR 63.455(a), Subpart S)

(b) For Emission Points AA-206 and AA-208, the permittee shall submit a semi-annual report of compliance with the Site-Specific Inspection Plan in accordance with Condition 5.A.4 for the most recent semiannual period. The report should include a summary of the information specified in Condition 3.D.3.

(Ref.: 40 CFR 63.454(b), Subpart S)

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

(c) For Emission Points AA-206 and AA-208, the permittee shall submit a semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in Section 5.B.6. The report should be submitted in accordance with Condition 5.A.4 for the most recent semi-annual period.

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

(d) For Emission Points AA-206 and AA-208, the permittee shall submit a semiannual report indicating periods of excess emissions for each applicable CMS or Control Device specified in 40 CFR 63.454, Subpart S.

The report should be submitted in accordance with Condition 5.A.4 for the most recent semiannual period. Each excess emission report shall include the information required in 40 CFR Part 63, Subpart A. Periods of excess emissions allowed by Conditions 3.B.12(c) and 3.B.13(d) are not considered deviations, which require submittal of deviation reporting as required in Condition 5.A.5 or 1.25(iv).

(Ref.: 40 CFR 63.453, Subpart S)

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

(e) For Emission Points AA-206 and AA-208, the permittee shall submit a semiannual report of compliance with the requirements set forth in Conditions 5.B.5, 5.B.6, and 5.B.8. The report should be submitted in accordance with Condition 5.A.4 for the most recent semi-annual period.

(Ref.: 40 CFR 63.453(k), Subpart S)

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

(f) For Emission Point AA-208, the permittee shall submit a semi-annual report of compliance with the requirements set forth in Conditions 5.B.8(d) and 5.B.8(e). The report should be submitted in accordance with Condition 5.A.4 for the most recent semi-annual period.

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

5.C.6 REPORTING REQUIREMENTS FOR EMISSION POINT AA-302

For Emission Point AA-302, the permittee shall submit the records of the maximum rolling 365-day average Air Dried Secondary Pulp throughput in tons per day during the reporting period in accordance with Condition 5.A.4.

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

5.C.7 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-401, AA-402, AA-405, AA-406, and AA-501

(a) No later than June 13, 2004, for Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee shall submit a report of the operating ranges for any monitoring parameters determined during the Initial Compliance testing for HAP Metals in accordance with Condition 5.C.1.

In addition, the permittee has the option to update the applicable parameters based on testing and those updates must be submitted concurrently with the subsequent compliance test reports required by Condition 5.C.1.

(Ref.: 40 CFR 63.864(j), Subpart MM)

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

(b) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee shall submit all applicable notifications from 40 CFR Part 63, Subpart A as detailed in 40 CFR 63.860 – Table 1, Subpart MM.

(Ref.: 40 CFR 63.867(a), Subpart MM)

(c) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee shall submit semi-annual excess emission reports containing the information specified in 40 CFR 63.867(c)(1) – (c)(5), Subpart MM. The permittee must submit semi-annual excess emission reports following the procedure specified in 40 CFR 63.867(d)(2), Subpart MM as specified in 40 CFR 63.10(e)(3)(v), Subpart A and as required in Condition 5.A.5.

Periods of excess emissions allowed by Conditions 3.B.16(a) and 3.B.20(a) are not considered deviations which require submittal of deviation reporting as required in Condition 5.A.5 or 1.25(a)(1)(iv).

(Ref.: 40 CFR 63.867(b), Subpart MM)

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

(d) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, within sixty (60) days after the date of completing each performance test required by Subpart MM, the permittee shall submit the results of the performance test following the procedures specified in 40 CFR 63.867(d)(i) or (ii), Subpart MM. The permittee must upload an electronic copy of each stack test reporting for testing required after October 11, 2019.

(Ref.: 40 CFR 63.863(c)(2) and 63.867(d)(1), Subpart MM)

(e) For Emission Points AA-401, AA-402, AA-405, AA-406, and AA-501, the permittee must submit the notifications required in 40 CFR 63.9(b) and (h) [including any information specified in Condition 5.C.7(d)] and semi-annual reports to the EPA via the CEDRI.

The permittee must upload an electronic copy of each notification in CEDRI beginning with any notification specified in Condition 5.C.7 that is required after October 11, 2019. Additional requirements in the use of CEDRI are specified in 40 CFR 63.867(d)(2) – (4), Subpart MM.

(Ref.: 40 CFR 63.867(d)(2) – (4), Subpart MM)

5.C.8 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-401 and AA-402

(a) For Emission Points AA-401 and AA-402, the permittee shall submit records of the oxygen concentration in the boiler(s) flue gas and the 12-hour average O_2 concentration for the two consecutive operating periods of each operating day for both recovery furnace(s) in accordance with Condition 5.A.4.

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

(b) For Emission Points AA-401 and AA-402, the permittee shall submit records of the test results of TRS concentration in the boiler(s) flue gas by performance of EPA Methods 16, 16A, or 16C on a quarterly basis. Each quarterly testing shall be submitted within thirty (30) days following the end of each calendar quarter.

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

(c) For Emission Points AA-401 and AA-402, the permittee shall submit semiannual records of the hours of incineration of NCGs in the recovery furnaces based on a 365-day rolling total as specified in Condition 5.B.12(j) in accordance with Condition 5.A.4.

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

5.C.9 REPORTING REQUIREMENTS FOR EMISSION POINT AA-403

(a) For Emission Point AA-403, the permittee shall submit a semi-annual report summarizing the amount(s) and type(s) of fuels combusted as specified in 5.B.13(b) for the preceding 6-month period in accordance with Condition 5.A.4. The feed rates and percentages should be provided as 12-month rolling totals for each month in the preceding 6-month reporting period.

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

(b) For Emission Points AA-403, the permittee shall submit the opacity monitor records maintained in Condition 5.B.13(d) in accordance with Condition 5.A.4.

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

(c) For Emission Points AA-403, the permittee shall submit a summary in accordance with Condition 5.A.4 of the weekly inspections and/or maintenance conducted in accordance with Condition 5.B.13(g) and (h).

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

(d) For Emission Point AA-403, the permittee shall provide a notification of compliance status with the emission limitations for Emission Point AA-403 (found in Condition 3.B.17) before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations in accordance with 40 CFR 63.10(d)(2), Subpart A. These reports shall include the following:

(1) A description of the affected source(s) including identification of which subcategory the source is in, the capacity of the source, a description of add-on controls used on the source description of the fuel(s) burned, and justification for the fuel(s) burned during the performance test.

(2) Summary of the results of all performance tests, fuel analyses, and calculations conducted to demonstrate initial compliance, including all established operating limits.

(3) Identification of whether you are complying with the particulate matter emission limit, or the alternative total selected metals emission limit.

(4) Identification of whether you plan to demonstrate compliance with each applicable emission limit through performance testing or fuel analysis.

(5) Identification of whether you plan to demonstrate compliance by emissions averaging.

(6) A signed certification that you have met all applicable emission limits and work practice standards.

(7) A summary of the carbon monoxide emissions monitoring data and the maximum carbon monoxide emission levels recorded during the performance tests, to show that you have met applicable work practice standards in Table 1 of Subpart DDDDD.

(8) If you had a deviation from any emission limit or work practice standard, you must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance status report.

(e) For Emission Point AA-403, the permittee shall submit all applicable compliance reports in accordance with 40 CFR 63.7550. Unless a different schedule for submission of reports has been approved under 40 CFR 63.10(a); Subpart A, the permittee must submit each report according to 40 CFR 63.7550(h), Subpart DDDDD by the date in Table 9 of Subpart DDDDD and according to the requirements in 40 CFR 63.7550(b)(1) – (4).

(Ref.: 40 CFR 63.9(h)(2)(ii), Subpart A; 40 CFR 63.7545(e), Subpart DDDDD)

5.C.10 REPORTING REQUIREMENTS FOR EMISSION POINT AA-404

(a) For Emission Point AA-404, the permittee shall submit a semiannual report of the natural gas throughputs during the reporting period as specified in Condition 5.B.14(b) in accordance with Condition 5.A.4.

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

(b) For Emission Point AA-404, the permittee shall submit all applicable compliance reports in accordance with 40 CFR 63.7550, Subpart DDDDD. Unless a different schedule for submission of reports has been approved under 40 CFR 63.10(a); Subpart A, the permittee must submit each report according to 40 CFR 63.7550(h), Subpart DDDDD by the date in Table 9 of Subpart DDDDD and according to the requirements in 40 CFR 63.7550(b)(1) – (4), Subpart DDDDD.

For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to 40 CFR 63.7540(a)(10), (11), or (12), Subpart DDDDD (respectively) and not subject to emission limits or Table 4 operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report (as applicable) as specified in 40 CFR 63.7550(b)(1) – (4), Subpart DDDDD instead of a semi-annual compliance report.

(Ref.: 40 CFR 63.9 (h)(2)(ii), Subpart A)

(40 CFR 63.7545(e) and 63.7550, Subpart DDDDD)

5.C.11 REPORTING REQUIREMENTS FOR EMISSION POINT AA-405 and AA-406

(a) For Emission Points AA-405 and AA-406, the permittee shall submit a semi-annual summary of the weekly inspections and/or maintenance conducted in accordance with Condition 5.B.15(b) of this document in accordance with Condition 5.A.4.

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

(b) For Emission Points AA-405 and AA-406, the permittee shall submit a semi-annual monitoring system performance report including a summary of the pressure drop and scrubbing liquid flow in accordance with Condition 5.A.4 for the most recent semi-annual period.

(Ref.: 40 CFR 63.864(a)(2), Subpart MM)

5.C.12 REPORTING REQUIREMENTS FOR EMISSION POINT AA-501

(a) For Emission Point AA-501, the permittee shall submit quarterly reports of the lime kiln continuous emissions monitoring data for TRS and oxygen. The reports shall be submitted no later than twenty (20) days following the end of the reporting period.

(Ref.: 40 CFR 60.284(d) and (e), Subpart S)

(b) For Emission Point AA-501, the permittee shall submit records of the oxygen concentration in the flue gas, the TRS concentration in flue gas, and the 12-hour

average TRS and O_2 concentration for the two (2) consecutive operating periods of each operating day for the lime kiln in accordance with Condition 5.A.4.

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

(c) For Emission Point AA-501, the permittee shall submit records of the hours of incineration of NCG gases based on a 365-day rolling total in accordance with Condition 5.A.4.

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

(d) For Emission Points AA-501, the permittee shall submit a semiannual summary of the weekly inspections and/or maintenance required by Condition 5.B.16(b) in accordance with Condition 5.A.4.

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

(e) For Emission Point AA-501, the permittee shall submit a semi-annual monitoring system performance report including a summary of the average scrubbing liquid supply pressure and the pressure loss across the scrubber in accordance with Condition 5.A.4 for the most recent semi-annual period.

(Ref.: 40 CFR 63.864 and 63.866, Subpart MM)

(f) For Emission Point AA-501, the permittee shall submit a semiannual monitoring report including a summary of the scrubbing liquid pH that is collected on a once per shift basis, in accordance with Condition 5.A.4 for the most recent semiannual period. Per Condition 5.B.16(j), monitoring and recordkeeping is only required when pet coke is being fired.

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

5.C.13 REPORTING REQUIREMENTS FOR EMISSION POINT AA-519

For Emission Point AA-519, the permittee shall submit a semiannual summary of the monthly opacity observations conducted in accordance with Condition 5.B.18. The reports shall be submitted in accordance with Condition 5.A.4.

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

5.C.14 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-703 and AA-704

For Emission Points AA-703 and AA-704, the permittee shall submit all applicable compliance reports in accordance with 40 CFR 63.7550, Subpart DDDDD. Unless a different schedule for submission of reports has been approved under 40 CFR 63.10(a); Subpart A, the permittee must submit each report according to 40 CFR 63.7550(h), Subpart DDDDD by the date in Table 9 of Subpart DDDDD and according to the requirements in 40 CFR 63.7550(b)(1) – (4), Subpart DDDDD.

For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to 40 CFR 63.7540(a)(10), (11), or (12), Subpart DDDDD (respectively) and not subject to emission limits or Table 4 operating limits, the permittee

may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in 40 CFR 63.7550(b)(1) – (4) instead of a semi-annual compliance report.

(Ref.: 40 CFR 63.7550, Subpart DDDDD)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

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

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

Approval of Exemption in 40 CFR 60.283a(a)(1)(iv), Subpart BB for the Brown Stock Washing System (dated May 26, 2015)

FILE COPY

STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIKARD, EXECUTIVE DIRECTOR

May 26, 2015

Mr. Brent Collins
Vice President of Manufacturing
Georgia Pacific Monticello LLC
604 N A Sandifer Highway
Monticello, MS 39654

Dear Mr. Collins:

Re: Georgia Pacific Monticello LLC
Exemption from Control of TRS under
40 CFR 60.283a(a)(1)(iv)
Ref. No.1500-00007
Lawrence County

We have received and reviewed you minor modification application submitted on January 28, 2015. Part of this application includes plans to install a new "brownstock washer system" consisting of two brownstock washers, referred to as Chemi-washers and two (2) new filtrate tanks. Your application states that these will replace the three existing vacuum drum brownstock washers (Emission Point AA-202(a)) and six associated filtrate tanks which will be permanently shut down. Your submittal requests concurrence with your determination that the brownstock washer system being installed would qualify for exemption from control of TRS as allowed in 40 CFR 60.283a(a)(1)(iv). Your submittal indicates that the cost of collecting and controlling TRS emissions from the new brownstock washing system would be in excess of $550,000/ton. Based on previous determinations of economic infeasibility, an exemption from the TRS standard is appropriate for the brownstock washer system being installed at Georgia Pacific Monticello LLC. Please note that the brownstock washer system will be subject to the Subpart BBa standard for TRS if future changes in the mill make the control of TRS emission cost effective, as required by 60.283a(a)(1)(iv).

If you have any questions regarding this determination, please Scott Hodges of my staff at (601) 961-5672.

Sincerely,

Harry M. Wilson III, P.E.,DEE
Chief, Environmental Permits Division

1631 PER20150001

APPENDIX C

Compliance Assurance Monitoring (CAM) Plan

Table 2. Proposed CAM Plan for Smelt Dissolving Tank Vent Scrubbers Sulfur Dioxide and Lime Kiln Scrubber Sulfur Dioxide when Burning Pet Coke

Criteria	Indicator No. 1	Indicator No. 2
General Criteria Monitoring Approach	Monitoring of Scrubbing Liquid Flow Rate (as already required by 40 CFR 63, Subpart MM)	Monitoring of pH
General Criteria Indicator Range	Maintain 3-hour average parameter at or above the average value observed during a performance test conducted within 180 days of operating permit renewal to demonstrate compliance with applicable sulfur dioxide emission limit (option exists to conduct performance test at the flow determined for particulate matter parametric monitoring as part of Subpart MM compliance demonstration). The parametric limit may be reestablished based on subsequent compliance tests.	Maintain 3-hour average parameter at or above the minimum value observed during a performance test conducted within 180 days of operating permit renewal to demonstrate compliance with the applicable sulfur dioxide emission limit. The parametric limit may be reestablished based on subsequent compliance tests.
General Criteria Quality Improvement Plan Threshold	Excursions occurring greater than 5% of process operating time during each semi-annual reporting period. An excursion would be defined as a 3-hour average scrubber liquid flow rate measurement less than the normal operating range demonstrated during compliance testing other than periods of startup, shutdown, or malfunction.	Excursions occurring greater than 5% of process operating time during each semi-annual reporting period. An excursion would be defined as a 3-hour average pH less than the normal operating range demonstrated during compliance testing other than periods of startup, shutdown, or malfunction.
Performance Criteria Data Representativeness Rationale and Justification	Operation of the scrubber with a scrubber liquid flow rate below the value observed during a compliance test could indicate an abnormal operating condition for the scrubber and possibly a reduced SO_2 control efficiency.	Operation of the scrubber at a pH value below the value observed during a compliance test would indicate a reduced SO_2 control efficiency. Given the acidity of SO_2, reacting it with a alkaline material, such as caustic, converts the SO_2 to sodium sulfite. pH is an indicator of the amount of caustic that is present in the scrubbing liquid. Relying on pH provides feedback that there is sufficient caustic present to react with the SO_2.
Performance Criteria Verification Procedures	Install, calibrate, and operate a monitoring device that meets the requirements of 40 CFR 63, Subpart MM and operate it in accordance with manufacturer's specifications.	Install, calibrate, and operate monitoring devices in accordance with manufacturer's specifications.
Performance Criteria Quality Assurance Practices and Criteria	Perform QA/QC and calibration per manufacturer's specifications and recommended operation and maintenance practices.	Perform QA/QC and calibration per manufacturer's specifications and recommended operation and maintenance practices.
Performance Criteria Monitoring Frequency Data Averaging Periods	Measurement of scrubber liquid flow rate at least once every successive 15-minute period. The device must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate (per specifications in 40 CFR 63, Subpart MM). Recorded data would be reduced to 3-hour averages.	Measurements of pH at least once per hour. Recorded data would be reduced to 3-hour averages.
Performance Criteria Data Collection Procedures	Scrubber liquid flow rate data will be recorded in the Mill's data acquisition system.	pH data will be recorded in the Mill's data acquisition system.