# STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

## TO OPERATE AIR EMISSIONS EQUIPMENT

# THIS CERTIFIES THAT

Masonite Corporation 1001 South 4th Avenue Laurel, Mississippi Jones County

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

Permit Issued: June 29, 2013 Permit Modified: MAR 3 1 2015 Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: May 31, 2018

Permit No.: 1360-00028

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## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 (a) This permit shall be reopened and revised under any of the following circumstances:
  - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
  - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
  - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
  - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

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

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

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R.

6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) 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).)
- (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
- (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
  - (a) enter upon the permittee's premises where a Title V source is located or emissionsrelated 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(1).)
- 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.)

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- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)
- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
  - (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)
- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin.

Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
  - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
  - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."
- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial,

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

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private 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 noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
  - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)
- 1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
  - (a) Upsets (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.KK.)
    - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
      - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (ii) the source was at the time being properly operated;
      - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
      - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
      - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.

- (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)
  - (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- (c) Maintenance.
  - (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
- (ii) the source was at the time being properly operated;
- (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
- (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
- (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-009	Woodyard Cyclone
AB-102	<ul> <li>Line I and II dust collection system consisting of:</li> <li>Main Vacuum System Line I with baghouse (Ref. No. AB-003)</li> <li>Scalper &amp; Mat Trim Line I with baghouse (Ref. No. AB-004)</li> <li>Common Reject Line I &amp; II with baghouse (Ref. No. AB-005)</li> <li>Common Rough Trim &amp; Edge Saw Line I &amp; II with baghouse (Ref. No. AB-008)</li> <li>Lines I and II Vacuum System with baghouse (Ref. No. AB-010)</li> <li>Main Vacuum System Line II with baghouse (Ref. No. AC-003)</li> <li>Scalper &amp; Mat Trim Line II with baghouse (Ref. No. AC-004)</li> </ul>
AD-101	<ul> <li>Cut/Coat Line I Preheat and IR Ovens consisting of the following:</li> <li>Preheat Oven (Ref. No. AD-001), rated at 4.6 MMBTU/hr, natural gas fired</li> <li>IR Oven #1 (Ref. No. AD-003), rated at 5.7 MMBTU/hr, natural gas fired</li> <li>IR Oven #2 (Ref. No. AD-005), rated at 5.7 MMBTU/hr, natural gas fired</li> <li>IR Oven #3 (Ref. No. AD-007), rated at 5.7 MMBTU/hr, natural gas fired</li> <li>King Makeup Air Oven (Ref. No. AD-008), rated at 6.325 MMBTU/hr, natural gas fired</li> </ul>
AD-102	<ul> <li>Cut/ Coat Line I, consisting of the following:</li> <li>HVHA Oven #1 (Ref. No. AD-002), rated at 4.5 MMBTU/hr, with two stacks, natural gas fired</li> <li>HVHA Oven #2 (Ref. No. AD-004), rated at 4.5 MMBTU/hr, with two stacks, natural gas fired</li> <li>HVHA Oven #3 (Ref. No. AD-006), rated at 4.5 MMBTU/hr, with two stacks, natural gas fired</li> </ul>
AD-103	<ul> <li>Cut/Coat Line I, consisting of the following:</li> <li>Spray Booth No. 1 (Ref. No. AD-014), with cyclonic separator with disposable filter</li> <li>Spray Booth No. 2 (Ref. No. AD-015), with cyclonic separator with disposable filter</li> <li>Spray Booth No. 3 (Ref. No. AD-016), with cyclonic separator with disposable filter</li> </ul>
AD-104	Dust Collection System consisting of Cut/Coat Line I Saws equipped with a baghouse (Ref. No. AD-011) which controls emissions from sawing of the doorskins.
AD-105	Cut/Coat Line I humidification system equipped with five (5) stacks. Water containing a surfactant is applied to doorskins. The excess water is removed using a fan which exhausts to the atmosphere through the five (5) stacks.
AE-004	The 70" Hog (Cull Hardboard) equipped with a baghouse for control of emissions.
AI-102	<ul> <li>Line III Dust Collection System consisting of the following units:</li> <li>Main Vacuum System Baghouse (Ref. No. AI-003)</li> <li>Scalper and Mat Trim Baghouse (Ref. No. AI-004)</li> <li>Trim and Edge Saw Baghouse (Ref. No. AI-006)</li> <li>Housekeeping Line Cleanup Baghouse (Ref. No. AI-011)</li> </ul>
AJ-101	Cut/Coat Line II Preheat and IR Ovens consisting of the following: • AJ-004 • AJ-007

Emission Point	Description					
u 	• IR Oven #3 (Ref. No. AJ-010), 8.1 MMBTU/hr, natural gas fired					
AJ-102	<ul> <li>Cut/ Coat Line II ovens consisting of the following:</li> <li>HVHA Oven #1 (Ref. No. AJ-003), 4.5 MMBTU/hr, with two stacks, natural gas fired</li> <li>HVHA Oven #2 (Ref. No. AJ-006), 4.5 MMBTU/hr, with two stacks, natural gas fired</li> <li>HVHA Oven #3 (Ref. No. AJ-009), 4.5 MMBTU/hr, with two stacks, natural gas fired</li> </ul>					
AJ-103	Spray Booth	I, consisting of the following: No. 2 (Ref. No. AJ-005), with cyclonic separator with disposable filter No. 3 (Ref. No. AJ-008), with cyclonic separator with disposable filter				
AJ-011	Cut/Coat Line I	I: First Saw, Second Saw, and Third Saw equipped with a single baghouse.				
AL-101	AL-008	Press Line 1 Plastic Composite Doorskin Manufacturing				
	AL-009	Press Line 2 Plastic Composite Doorskin Manufacturing				
	AL-010	Press Line 3 Plastic Composite Doorskin Manufacturing				
	AL-011	Press Line 4 Plastic Composite Doorskin Manufacturing				
	AL-012	Press Line 5 Plastic Composite Doorskin Manufacturing				
	AL-013	Press Line 6 Plastic Composite Doorskin Manufacturing				
	AL-014	Press Line 7 Plastic Composite Doorskin Manufacturing				
	AL-015	Press Line 8 Plastic Composite Doorskin Manufacturing				
AN-001	RTO for the control of emissions from the manufacture of sheet molding compound (SMC).					
AN-002	SMC Maturation Room (Uncontrolled).					
BS-001	A Scheuch SAE	BA Bioscrubber which controls emissions from:				
	AB-101	Line 1: First Stage Dryer (Ref. No. AB-001) and the Second Stage Dryer (Ref. No. AB-002) each equipped with a high efficiency cyclone				
	AB-007	Line 1 Press				
	AC-101	Line 2 First Stage Dryer (Ref. No. AC-001) and the Second Stage Dryer (Ref. No. AC-002) each equipped with a high efficiency cyclone				
	AC-007	Line 2 Press				
	AI-101	Line 3 First Stage Dryer (Ref. No. AI-001) and the Second Stage Dryer (Ref. No. AI-002) each equipped with a high efficiency cyclone				
	AI-005	Line 3 Press Exhaust, equipped with an ultra-high efficiency cyclone system for control of emissions.				

Emission Point	Description
BS-002	Heat Energy Plant with by-pass stack using an electrostatic precipitator for control of particulate matter.
BS-003	Dry Fuels System Baghouse
BS-004	Ash Silo Bin Vent
EG-001	290 brake horsepower Emergency Diesel-Fired Secondary Fire Pump – Diesel fired
EG-002	100 brake horsepower Emergency for Water Removal Pump – Diesel fired
EG-003	Emergency Backup Generator for Catalyst Building A/C Unit – Natural gas fired
EG-004	Emergency Backup Generator for Guard Shack – Natural gas fired
EG-005	412 brake horsepower Emergency Backup Generator for HEP Controls and SABA Aeration – Diesel fired

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

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

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
  - (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
  - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 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 S	Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AB-102	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001, and August 12, 2008.	3.B.3	PM/PM10 (filterable only)	3.54 lbs/hr and 15.51 tons/year
AD-101	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.7	PM (filterable only)	0.6 lb/MMBTU
	11 Miss. Admin Code Pt. 2, R. 1.4.A(1).	3.B.6	SO2	4.8 lb/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AD-102	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	VOC	3.4 lbs/hr and 14.87 tons/yr
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.7	PM (filterable only)	0.6 lb/MMBTU
	11 Miss. Admin Code Pt. 2, R. 1.4.A(1).	3.B.6	SO2	4.8 lb/MMBTU
AD-103	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in	3.B.3	PM/ PM <sub>10</sub> (filterable only)	5.8 lbs/hr and 25.4 tons/year
	TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	VOC	6.43 lbs/hr and 28.15 tons/yr
AD-104	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	PM/ PM <sub>10</sub> (filterable only)	1.48 lbs/hr and 6.48 tons/year
AE-004	Federally Enforceable Permit to Construct issued March 13, 1990, modified February 26, 1991.	3.B.2	PM/ PM <sub>10</sub> (filterable only)	0.07 lbs/hr and 0.3 tons/year
AI-102	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	PM/ PM <sub>10</sub> (filterable only)	1.85 lbs/hr and 8.10 tons/year
AJ-101	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.7	PM (filterable only)	0.6 lb/MMBTU
	11 Miss. Admin Code Pt. 2, R. 1.4.A(1).	3.B.6	SO2	4.8 lb/MMBTU

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AJ-102	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	VOC	2.95 lbs/hr and 12.91 tons/yr
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.7	РМ	0.6 lb/MMBTU
	11 Miss. Admin Code Pt. 2, R. 1.4.A(1).	3.B.6	SO2	4.8 lb/MMBTU
AJ-103	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in	3.B.3	PM/ PM <sub>10</sub> (filterable only)	5.8 lbs/hr and 25.4 tons/year
	TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.		VOC	10.26 lbs/hr and 44.95 tons/yr
AD-102 AD-103	Ũ		HAPs	Applicability
AJ-102 and AJ-103	AJ-102 Part 63, Subpart QQQQ. and	3.B.1	HAPs	0.06 lb HAP/gal solid
AJ-011	Federally Enforceable Permit to Construct issued February 25, 1997, modified July 20, 2000, July 27, 2001 and as modified in TVOP issued December 31, 2003 and Federally Enforceable Permit to Construct modified on August 12, 2008.	3.B.3	PM/ PM <sub>10</sub> (filterable only)	0.6 lbs/hr and 2.3 tons/year
AL-101	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.B.10	HAPs	Applicability
	Federally Enforceable PSD Permit to Construct issued January 28, 2005	3.B.12	VOCs	19.58 lbs/hr and 85.8 tons/year
AN-001 AN-002	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.B.10	HAPs	Applicability
	NESHAP for Reinforced Plastic Composites Production, 40 CFR	3.B.11		• Reduce the total organic HAP emissions from SMC manufacturing by at least 95

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	Part 63, Subpart WWWW, 63.5805(d)(1)			<ul> <li>percent by weight or</li> <li>The alternative organic HAP emission limit of 2.4 pounds per ton of SMC</li> </ul>
AN-001	Federally Enforceable PSD Permit to Construct issued	3.B.12	VOC	4.9 lbs/hr and 13.6 tons/year
	January 28, 2005, modified in TV issued August 25, 2005	3.B.12	Opacity	Not to exceed 40%
BS-001	Federally Enforceable Permit to Construct issued January 14, 2009 and modified on June 25, 2009, January 11, 2010,	3.B.5	PM/PM <sub>10</sub> (filterable only)	49.7 lbs/hr and 200.8 tons/year, as determined by EPA Test Methods 1-5, 40 CFR 60, Appendix A.
	2009, January 11, 2010, December 2, 2010, and <issuance date=""> via modification of the Title V permit.</issuance>		VOC	116.3 lbs/hr and 305.95 tons/year, as determined by EPA Test Method 25A and OTM 26 (also known as WPP1 VOC), 40 CFR 60, Appendix A.
			Nitrogen Oxides	50.0 lbs/hr and 219.0 tons/year, as determined by EPA Test Method 7, 40 CFR 60, Appendix A.
			Opacity	Not to exceed 40%
		3.B.18	Operational Restriction	Urea Formaldehyde or Phenol Formaldehyde Resin may be used in the processes controlled by the Bioscrubber. Wood Furnish used in the process may be a blend of up to 100% pine or hardwood.
BS-002	BS-002 Federally Enforceable Permit to Construct issued January 14, 2009 and modified on June 25, 2009, January 11, 2010, and December 2, 2010.	3.B.5	Opacity	Not to exceed 40%
		3.B.15	Fuel Restriction	Wood fuel is restricted to uncontaminated wood (all forms and species), wood fiber from pollution control devices and waste water treatment units), and bark. All wood products manufactured at the Masonite, Laurel facility may be utilized as fuel in the wood fired heater.
		Add to permit	PM (filterable only)	E = 0.8808*I-0.1667
AB-101 AB-007 AC-101 AC-007 AI-101 AI-	NESHAP for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD.	3.B.14	HAPs	Applicability

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
005 BS- 001 BS- 002				
BS-003	Federally Enforceable Permit to Construct issued January 14, 2009 and modified on June 25, 2009, January 11, 2010, and	3.B.5	PM/PM <sub>10</sub> (filterable only)	3.0 lbs/hr not to exceed 13.0 tons/year
	December 2, 2010.	3.B.5	Opacity	Not to exceed 40%
BS-004	Federally Enforceable Permit to Construct issued January 14, 2009 and modified on June 25, 2009, January 11, 2010, and	3.B.5	PM/PM <sub>10</sub> (filterable only)	0.4 lbs/hr not to exceed 1.8 tons/year
	December 2, 2010.	3.B.5	Opacity	Not to exceed 40%
EG-001 EG-002 EG-003 EG-004 EG-005	NESHAP for Reciprocating Internal Combustion Engines (RICE)	3.B.16	HAPs	Applicability
EG-005	NSPS for Stationary Compression Ignition Internal Combustion Engines	3.B.17	HAPs	Applicability

- 3.B.1. For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall limit organic HAP emission to the atmosphere to no more than 0.06 lbs HAPs/gal solids as stated in Table 2 of Subpart QQQQ. (40 CFR 63, Subpart QQQQ §63.4690(b))
- 3.B.2. The permittee shall comply with the limits established in the Federally Enforceable Permit to Construct issued March 13, 1990, and modified February 26, 1991.
- 3.B.3. The permitted shall comply with the limits established in their Federally Enforceable Permit to Construct issued February 25, 1997, modified on July 20, 2000, July 27, 2001, and modified in TVOP issued December 31, 2003 and modified in Federally Enforceable Permit to Construct modified on August 12, 2008.
- 3.B.4. The permittee shall comply with the limits established in their State of Mississippi Air Pollution Control Permit to Operate issued June 9, 1992, and modified in the Title V Permits issued on September 23, 2004, and August 25, 2005.
- 3.B.5. The permittee shall comply with the limits established in their Federally Enforceable Permit to Construct issued January 14, 2009 and modified on June 25, 2009, January 11, 2010,

December 2, 2010 and modification of the Title V permit on <ISSUANCE DATE>.

- 3.B.6. For Emission Points AD-101, AD-102, AJ-101, and AJ-102, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)
- 3.B.7. The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.B.8. The permittee shall not cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship  $E = 4.1 \text{ p}^{0.67}$  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).)
- 3.B.9. Emission Points AL-101, AN-001, and AN-002, are affected by and shall comply with the applicable requirements and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR Subpart 63, Subpart WWWW and the applicable General Provisions, 40 CFR Subpart A as noted in Table 15 of Subpart WWWW. Subpart WWWW and Subpart A have been what included in Appendices C and D of this permit, respectively. (Ref.: 40 CFR Part 63 Subparts A and WWWW and §63.5925)
- 3.B.10. Emission Points AD-102, AD-103, AJ-102, and AJ-103, are affected by and shall comply with the applicable requirements and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ and the applicable General Provisions, 40 CFR Part 63, Subpart A as noted in Table 4 of Subpart QQQQ.
- 3.B.11. For Emission Point AN-001, the permittee shall reduce the total organic HAP emissions from SMC manufacturing by at least 95 percent by weight or the alternative organic HAP emission limit of 2.4 pounds per ton of SMC. (Ref. 40 CFR 63, Subpart WWWW, §63.5805(d)(1))
- 3.B.12. For Emission Points AL-101 and AN-001, the permittee shall comply with the limits established in their PSD Federally Enforceable Permit to Construct issued January 28, 2005, and modified in the Title V Permit issued August 25, 2005.

3.B.13. The permittee shall comply with the limits established in their Federally Enforceable Permit 1774 PER20140001

to Construct issued January 14, 2009, and modified on June 25, 2009, January 11, 2010, and December 2, 2010.

- 3.B.14. Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-005 BS-001, and BS-002 are affected by and shall comply with the applicable requirements and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD.
- 3.B.15. For Emission Point BS-002, wood fuel is restricted to uncontaminated wood (all forms and species), wood fiber (including wood fiber from pollution control devices and waste water treatment units), and bark. All wood products manufactured at the Masonite, Laurel facility may be utilized as fuel in the wood fired heater.
- 3.B.16. Emission Points EG-001, EG-002, EG-003, EG-004, and EG-005, are affected by and shall comply with the applicable requirements and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ.
- 3.B.17. Emission Point EG-005, is affected by and shall comply with the applicable requirements and any subsequent revisions of the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, NSPS Subpart IIII.
- 3.B.18. For Emission Point BS-001, Urea Formaldehyde or Phenol Formaldehyde resins maybe used in the processes controlled by the bioscrubber. Wood Furnish used in the process may be a blend of up to 100% pine or hardwood. (Ref.: Federally Enforceable Permit to Construct issued January14, 2009 and modified on June 25, 2009, January 11, 2010, December 2, 2010, and <ISSUANCE DATE> via modification of the Title V permit.)

#### C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
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Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	РМ	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	$SO_2$	4.8 lbs/MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AL-101	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.D.1	HAPs	Closed molding, cleaning, and, storage
AN-001 AN-002	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.D.4	HAPs	SMC Manufacturing Operation
AD-102 AD-103 AJ-102 AJ-103	National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ.	3.D.2	HAPs	Storing, mixing, cleaning
AN-001	NESHAP for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW	3.D.3	HAPs	SMC Manufacturing Operation
AN-002	NESHAP for Reinforced Plastic Composites	3.D.4	HAPs	SMC Maturation Room

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	Production, 40 CFR Part 63, Subpart WWWW			
AL-101 AN-001 AN-002	40 CFR Part 63, Subpart A – General Provisions	3.D.5	HAPs	Requirement to operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(3)
AL-101 AN-001	40 CFR Part 63, Subpart A – General Provisions	3.D.6	HAPs	Startup, shutdown, and malfunction (SSM) plan
EG-001 EG-002	NESHAP for Reciprocating Internal Combustion Engine, 40 CFR Part 63, Subpart ZZZZ	3.D.7	HAPs	Work Practice Standards
EG-001 EG-002 EG-003 EG-004	NESHAP for Reciprocating Internal Combustion Engine, 40 CFR Part 63, Subpart ZZZZ	3.D.7 through 3.D.14	HAPs	General Operating Requirements
EG-005	NSPS for Stationary Compression Ignition Internal Combustion Engines	3.D.21 through 3.D.24	Operating Requirements	Work Practice Standards
BS-001 AB-101	NESHAP for Plywood Composite Wood Products, 40 CFR Part	3.D.19 3.D.20	HAPs	Compliance Options
AB-007 AC-101 AC-007 AI-101 AI-007	63, Subpart DDDD	3.D.21 through 3.D.24		General Operating Requirements

- 3.D.1 For Emission Points AL-008, AL-009, AL-010, AL-011, AL-012, AL-013, AL-014, and AL-015, the permittee shall comply with the following work practice standards:
  - (a) The permittee shall uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

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

(Ref.: 40 CFR Part 63, Subpart WWWW, Table 4 and §63.5805(b))

- 3.D.2 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee is not required to meet any work practice standards. (40 CFR Part 63, Subpart QQQQ §63.4693(a))
- 3.D.3 For Emission Points AN-001, the permittee shall comply with the following work practice standards:
  - (a) The permittee shall close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
  - (b) The permittee shall use a nylon containing film or a film with an equal or lower permeability to styrene compared to a nylon containing film to enclose SMC.

(Ref.: 40 CFR Part 63, Subpart WWWW, Table 4 and §63.5805(b))

- 3.D.4 For Emission Point AN-002, the permittee shall comply with the following work practice standards:
  - (a) The permittee shall not uncover, unwrap or expose any material in Maturation Room, other than for sampling.
  - (b) All access doors and openings shall be closed, other than for entry or exit, when Material is in the Maturation Room.

(Ref. Federally Enforceable PSD Permit to Construct issued January 28, 2005)

- 3.D.5 For Emission Points AL-008, AL-009, AL-010, AL-011, AL-012, AL-013, AL-014, AL-015, AN-001, and AN-002, the permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- 3.D.6 For Emission Points AL-008, AL-009, AL-010, AL-011, AL-012, AL-013, AL-014, AL-015, and AN-001, the permittee shall develop and implement a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emissions limits met using an add-on control.

- 3.D.7 For Emission Points EG-001 and EG-002, the permittee shall comply with the work practice standards detailed in 40 CFR 63 Subpart ZZZZ, Table 2C:
  - (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
  - (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
  - (Ref.: 40 CFR 63 Subpart ZZZZ, Table 2C and §63.6602)
- 3.D.8 For Emission Points EG-001 through EG-004, the permitee, at all times, the permittee must 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. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (Ref: §63.6605(b))
- 3.D.9 For Emission Points EG-001 through EG-004, the permitee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop an individual 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. (Ref: §63.6625(e))
- 3.D.10 For Emission Points EG-001 through EG-004, the permittee must install a non-resettable hour meter if one is not already installed. (Ref: §63.6625(f))
- 3.D.11 For Emission Points EG-001 through EG-004, the permittee must 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 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to Subpart ZZZZ apply. (Ref: §63.6625(h))
- 3.D.12 For Emission Points EG-001 and EG-002, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to Subpart ZZZZ. The oil analysis must be performed at the same frequency specified

for changing the oil in Table 2c or 2d to Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (Ref: §63.6625(i))

- 3.D.13 For Emission Points EG-003 and EG-004, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (Ref: §63.6625(j))
- 3.D.14 For Emission Points EG-001 through EG-004, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (d) below, is prohibited.
  - (a) There is no time limit on the use of emergency stationary RICE in emergency situations.

- (b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).
  - (1) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
  - (2) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - (3) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (c) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (b) of this condition. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref: §63.6640(f))

- 3.D.15 The permittee shall meet the compliance options and operating requirements described in Table 1B of Subpart DDDD, through the use of add-on controls, BS-001, the bioscrubber. (Ref: §63.2240(b))
- 3.D.16 For Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-007, and BS-001, the permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in § 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. . (Ref: §63.2250(a))
- 3.D.17 For Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-007, and BS-001, the permitee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in § 63.6(e)(1)(i). (Ref: §63.2250(b))
- 3.D.18 For Emission Points AB-101, AB-007, AC-101, AC-007, AI-101, AI-007, and BS-001, to the extent practical, start-up and shutdown of emission control systems must be scheduled during times when process equipment is also shut down. (Ref: §63.2250(c))
- 3.D.19 For Emission Point BS-001, the continuous parameter monitoring (CPMS) must be capable of completing a minimum of one cycle of operating (sampling, analyzing, and recording) for each successive 15-minute period. (Ref. §63.2269(a))
- 3.D.20 For Emission Point BS-001, at all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs, of the monitoring equipment. (Ref. §63.2269(b))
- 3.D.21 For Emission Point EG-005, a non-resettable hour meter must be installed on the CI ICE. (Ref: §60.4209(b))
- 3.D.22 For Emission Point EG-005, the permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. (Ref: §60.4207(b))
- 3.D.23 For Emission Point EG-005, the permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in §§ 60.4204 and 60.4205 over the entire life of the engine. (Ref: §60.4206)

3.D.24 For Emission Point EG-005, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. (Ref: §60.4214(b))

## SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
  - (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

#### A. <u>General Monitoring, Recordkeeping and Reporting Requirements</u>

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
  - 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
  - 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
  - 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said

report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
BS-001	PM/PM10	Biennial Compliance Testing	5.B.4	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	VOCs	Biennial Compliance Testing	5.B.5	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	NOx	Biennial Compliance Testing	5.B.3	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	Opacity	Weekly Visible Emissions Evaluation	5.B.2	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	Maintenance Records	Weekly Records	5.B.1	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
BS-003 BS-004	Opacity	Weekly Visible Emissions Evaluation	5.B.2	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
AB-102 AD-104 AE-004 AI-102 AJ-011	Maintenance Inspections	Weekly Records	5.B.1	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	Opacity	Weekly Visible Emissions Evaluation	5.B.2	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).
	Pressure Drop	Monitor and record the pressure drop across the baghouse on a weekly basis.	5.B.6	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).

#### B. <u>Specific Monitoring and Recordkeeping Requirements</u>

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Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement	
AD-102 AJ-102 (ovens)	Volatile Organic Compounds	Biennial Compliance Testing	5.B.5	For determination of compliance with limitations set herein.	
AD-103 AJ-103 (spray booths)	PM/PM <sub>10</sub>	Biennial Compliance Testing	5.B.4	For determination of compliance with limitations set herein.	
	VOC	Biennial Compliance Testing	5.B.5		
	Maintenance Weekly Records Inspections		5.B.1	11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).	
AL-101 AN-001 and AN-002	HAPs	General Compliance Requirements	5.B.7	§63.5835	
		Compliance Demonstration	5.B.8	\$63.5900(a)(4), (b), (d)	
		Recordkeeping	5.B.9 5.B.10	§63.5920(a)(1), (d) and (d)	
AD-102	HAPs	s Recordkeeping		§63.4730	
AD-103 AJ-102 AJ-103	HAPs	Continuous Compliance	5.B.12	\$63.4752 \$63.4731	
AN-001 AN-002	HAPs	Testing and Initial Compliance Requirements	5.B.13 5.B.14	\$63.5850, \$63.5840, \$63.5845	
AL-101 AN-001	HAPs	HAPs Testing and Initial Compliance Requirements		5.B.15 5.B.16 5.B.17	For determination of compliance with limitations set herein.
		Startup, Shutdown, and Malfunction Plan(SSMP)	5.B.18	For determination of compliance with limitations set herein.	
AB-102 AI-102 AD-011 AJ-011 & AD-103 AJ-103	PM/PM <sub>10</sub>	CAM Plan Requirements	5.B.20 & 5.B.21	40 CFR 64	

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

Records of weekly inspections and the details of any maintenance performed shall be kept in log form and made available for review upon request by MDEQ personnel, and submitted in accordance with 5.A.4.

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

- 5.B.2 For emission points AB-102, AD-103, AD-104, AE-004, AI-102, AJ-011, BS-001, BS-003, and BS-004, the permittee shall assure compliance with the opacity limitations by weekly observations of emissions from exhaust stacks during periods of operation. If any visible emissions are detected, with the exception of steam plumes, EPA Reference Method 9 shall be performed by a certified observer. The permittee shall maintain records of weekly visible emissions observations and results of any Method 9 observations that are performed in a written or electronic log. If conditions are such that opacity readings cannot be taken using observations of Method 9, the permittee shall note these conditions in the log and provide an explanation of why it was not possible to perform opacity readings/observations. A summary report shall be submitted in accordance with 5.A.4. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.3 For emission points BS-001, the permittee shall demonstrate compliance with nitrogen oxides emission limitation by stack testing in accordance with EPA Reference Methods
  7. The stack test reports for Emission Points BS-001 shall be submitted by December 31, 2013, and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the sources at maximum capacity unless otherwise approved by the Department. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.4 For emission points BS-001, AD-103, and AJ-103, the permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5. Stack test reports for Emission Points AB-007, AB-101, AC-007, AC-101, AD-103, and BS-001 shall be submitted by December 31, 2013, and biennially thereafter. Stack test reports for Emission Point AJ-103 shall be submitted by December 31, 2014 date and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the sources at maximum capacity unless otherwise approved by the Department. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.B.5 For Emission Points BS-001, AD-102, AD-103, AJ-102, and AJ-103, the permittee shall demonstrate compliance with volatile organic compound emission limitations by stack testing in accordance with EPA Reference Method 25A and OTM26 (also known as WPP1 VOC). Stack test reports for Emission Points BS-001, AD-102, and AD-103 shall be submitted by December 31, 2013, and biennially thereafter. Stack test reports for

Emission Points AJ-102, and AJ-103, shall be submitted by December 31, 2014 and biennially thereafter. For the purpose of compliance demonstration the permittee shall operate the sources at maximum capacity unless otherwise approved by the Department. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.6 For Emission Points AB-102, AD-104, AE-004, AI-102, and AJ-011, the permittee shall install measuring devices as are necessary for monitoring and/or measurement of pressure drop across the baghouse control system. The permittee shall record pressure drop readings across each baghouse emission control system on a weekly basis. A summary report shall be submitted in accordance with Section 5.A.4 of this document.

The permittee shall maintain access 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 cease operations of the emission source controlled by the failed pollution control equipment until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)

5.B.7 For Emission Points AL-101, AN-001, and AN-002, the permittee shall be in compliance at all times with the work practice standards in 3.D.1. (Ref.: 40 CFR §63.5835)

- 5.B.8 For Emission Points AL-101, AN-001, and AN-002, the permittee shall demonstrate continuous compliance with 3.D.1 and 3.D.2, as specified below:
  - (a) Compliance with the work practice standards as stated in 3.D.1 and 3.D.2 of this permit is demonstrated by performing the required work practice;
  - (b) The permittee shall report each deviatiosn from 3.D.1 and 3.D.2. The deviation shall be reported according to the requirements in 5.C.5(b) ; and
  - (c) During periods of startup, shutdown or malfunction, the permittee must operate the affected source in accordance with the startup, shutdown, and malfunction plan. (Ref.: 40 CFR §63.5900(a)(4), (b), and (d))
- 5.B.9 For Emission Points AL-101, AN-001, AN-002, the permittee shall keep the following applicable records:
  - (a) A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any initial notification or notification of compliance status submitted, according to the requirements in §63.10(b)(2)(xiv);
(b) The permittee shall keep a certified statement that the permittee is in compliance with the work practice requirements in 3.D.1.

(Ref.: 40 CFR §63.5915(a)(1) and (d))

- 5.B.10 For Emission Points AL-101, AN-001, and AN-002, the permittee shall maintain all applicable records specified in 5.B.10 in the following manner:
  - (a) The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1);
  - (b) As specified in 40 CFR §63.10(b)(1), the permittee shall keep each record for 5 (five) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;
  - (c) The records shall be kept onsite for at least 2 (two) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records offsite for the remaining 3 (three) years; and
  - (d) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR §63.5920)

- 5.B.11 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee shall collect and keep records of the data and information specified below:
  - (a) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, then records of the complete test report must be kept. If information was provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided that was provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
  - (b) For each compliance period, the following records must be kept:
    - 1. A record of the coating operations at which each compliance option was used and the time periods (beginning and ending dates and times) when each option was used.

- 2. For Emission Points AD-102, AD-103, AJ-102, AJ-103, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 in §63.4751; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4); the calculation of the total volume of coating solids used each month, using Equation 2 in §63.4751; and the calculation of each 12-month organic HAP emission rate, using Equation 3 in §63.4751.
- (c) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.
- (d) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
- (e) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (f) A record of the density for each coating used during each compliance period and the density for each thinner and cleaning material used during each compliance period.
- (g) If the permittee uses an allowance in Equation 1 in §63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), the permittee must keep the following records:
  - 1. The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 in §63.4751; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
  - 2. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 in §63.4751.
  - 3. The methodology used in accordance with §63.4751(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- (h) The permittee must keep records of the date, time, and duration of each deviation.

Failure to collect and keep these records is a deviation from the applicable standard. (40 CFR Part 63, Subpart QQQQ §63.4730)

- 5.B.12 For Emission Points AD-102, AD-103, AJ-102 and AJ-103, the permittee shall demonstrate continuous compliance:
  - (a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of §63.4751, must be less than or equal to the applicable emission limit in §63.4690. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4750 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee shall perform the calculations in §63.4751(a) through (g) on a monthly basis using data from the previous 12 months of operation.
  - (b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Condition 3.B.1, this is a deviation from the emission limitations for that compliance period and must be reported as specified in Condition 5.C.7 and 5.C.10.
  - (c) The permittee shall maintain records as specified in Condition 5.B.20 and each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - (40 CFR Part 63, Subpart QQQQ §63.4752 and §63.4731)
- 5.B.13 For Emission Points AN-001, the permittee shall conduct performance tests, performance evaluations, and design evaluations as follows:
  - (a) The permittee shall conduct each performance test, performance evaluation, and design evaluation in 40 CFR Part 63, Subpart SS that applies. The basic requirements for performance test, performance evaluations, and design evaluations are presented in Table 6 of 40 CFR Part 63, Subpart WWWW.
  - (b) Each performance test must be conducted according to the requirements in Sec. 63.7(e)(1) and under the specific conditions that 40 CFR part 63, subpart SS, specifies.
  - (c) Each performance evaluation must be conducted according to the requirements in §63.8(e) as applicable and under the specific conditions that 40 CFR part 63, subpart SS, specifies.

- (d) The permittee may not conduct performance tests or performance evaluations during periods of startup, shutdown, or malfunction, as specified in §63.7(e)(1).
- (e) The permittee shall conduct the control device performance test using the emission measurement methods specified in paragraphs (e)(1) through (5) of this section.
  - (1) Use either Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select the sampling sites.
  - (2) Use Method 2, 2A, 2C, 2D, 2F or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.
  - (3) Use Method 18 of appendix A to 40 CFR part 60 to measure organic HAP emissions or use Method 25A of appendix A to 40 CFR part 60 to measure total gaseous organic emissions as a surrogate for total organic HAP emissions. If Method 25A is used, the permittee shall assume that all gaseous organic emissions measured as carbon are organic HAP emissions. If Method 18 is used and the number of organic HAP in the exhaust stream exceeds five, the permittee shall take into account the use of multiple chromatographic columns and analytical techniques to get an accurate measure of at least 90 percent of the total organic HAP emissions from a combustion device; use instead Method 25A and assume that all gaseous organic mass emissions measured as carbon are organic HAP emissions.
  - (4) The permittee may use American Society for Testing and Materials (ASTM) D6420-99 (available for purchase from at least one of the following addresses: 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959; or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.) in lieu of Method 18 of 40 CFR part 60, appendix A, under the conditions specified in paragraphs (c)(4)(i) through (iii) of this section.
    - i. If the target compound(s) is listed in Section 1.1 of ASTM D6420-99 and the target concentration is between 150 parts per billion by volume and 100 parts per million by volume.
    - ii. If the target compound(s) is not listed in Section 1.1 of ASTM D6420-99, but is potentially detected by mass spectrometry, an additional system continuing calibration check after each run, as detailed in Section 10.5.3 of ASTM D6420-99, must be followed, met, documented, and submitted with the performance test report even if the permittee does not use a moisture condenser or the compound is not considered soluble.

- iii. If a minimum of one sample/analysis cycle is completed at least every 15 minutes.
- (5) Use the procedures in EPA Method 3B of appendix A to 40 CFR part 60 to determine an oxygen correction factor if required by Sec. 63.997(e)(2)(iii)(C). The permittee may use American Society of Mechanical Engineers (ASME) PTC 19-10-1981-Part 10 (available for purchase from ASME, P.O. Box 2900, 22 Law Drive, Fairfield, New Jersey, 07007-2900, or online at www.asme.org/catalog) as an alternative to EPA Method 3B of appendix A to 40 CFR part 60.
- (f) The control device performance test must consist of three runs and each run must last at least 1 hour. The production conditions during the test runs must represent normal production conditions with respect to the types of parts being made and material application methods. The production conditions during the test must also represent maximum potential emissions with respect to the organic HAP content of the materials being applied and the material application rates.
- (g) For a concentrator/oxidizer control device, the permittee shall test the combined flow upstream of the concentrator, and the combined outlet flow from both the oxidizer and the concentrator to determine the overall control device efficiency. If the outlet flow from the concentrator and oxidizer are exhausted in separate stacks, the permittee shall test both stacks simultaneously with the inlet to the concentrator to determine the overall control device.
- (40 CFR Part 63, Subpart WWWW §63.5850)
- 5.B.14 For Emission Points AN-001, the permittee shall conduct performance testing every 5 years following the initial performance test. (40 CFR Part 63, Subpart WWWW §63.5840 and §63.5845)
- 5.B.15 For Emission Point AN-001, if the concentrator portion of the control device is used, the permittee shall follow the guidelines in Condition 5.B.43(f), 5.B.43(g), and the applicable requirements in 40CFR63, Subpart SS. If only the catalytic oxidizer portion is used, the permittee shall follow the guidelines in Condition 5.B.43(f), and the applicable requirements in 40CFR63, Subpart SS.
- 5.B.16 For Emission Point AN-001, if the concentrator portion of the control device is activated, the permittee shall demonstrate compliance with the organic HAP emissions reduction limitation as specified in 40 CFR Part 63, Subpart WWWW §63.5805 within

180 days of the activation of the concentrator portion of the control device. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.17 For Emission Points AL-101 and AN-001, the permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).
- 5.B.18 For Emission Points AL-101 and AN-001, the permittee shall develop and implement a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emissions limits met using an add-on control.
- 5.B.19 For all stack tests, the permittee shall provide properly located sampling ports, adequate for applicable test methods, safe sampling platforms, and safe, ready access for test observers. The sampling platform shall be sufficiently large to provide for at least one observer in addition to personnel performing the test. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 5.B.20 For Emission Points AB-102, AI-102, AD-011, and AJ-011, 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 H and summarized in the table below. 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 actions taken.

Pollutant: PM/PM <sub>10</sub>	Indicator No. 1: Opacity	Indicator No. 2 Pressure Drop (dP)	
Measurement Approach	Perform the weekly Visible Emission Evaluations and follow up with EPA Method 9 Visible Emission Observations if emissions are observed as required by the Title V Operating Permit.	3-hour max pressure drop readings taken electronically utilizing the mill's data acquisition system (PI).	
II. Indicator Range Indicator level is no visible emissions.		Established ranges for photo-helic gauge pressure drop readings are set based on control device manufacturer recommendations. Range is set at 0-5" $H_2O$ .	
III. Performance Criteria			
A. Data Representativeness	Measurements are made at emission point.	Pressure taps are located at the baghouse inlet and outlet.	
B. Verification of Not applicable. Operational Status		Pressure gauges are calibrated quarterly. Pressure taps are checked daily for	

Baghouse for control of Particulate Matter Control

		plugging if required by gauge reading.
C. QA/QC Practices and Criteria	The observer will be a Method 9 trained observer and will follow Method 9 procedures as required.	Pressure gauges are calibrated quarterly. Pressure taps are checked daily for plugging if required by the gauge reading.
D. Monitoring Frequency	Weekly Visible Emission Readings (EPA Method 9) as required by this operating permit.	Pressure drop monitored continuously as well as being recorded manually.
E. Data Collection Procedure	Six Minute Method 9 observations will be performed weekly as necessary.	Data is continuously monitored with the mill's data acquisition system recording data from baghouse photo-helic gauges as well as being recorded manually.
F. Averaging Period 6 min.		3-hour max is used to determine compliance.

5.B.21 For Emission Points AD-103 and AJ-103, 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 H and summarized in the table below. 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 actions taken.

	C*1. C 1		
Cyclone separator with	i filter for control	of Particulate Matter Control	:

Pollutant: PM/PM <sub>10</sub>	Indicator Pressure Drop (dP)
Measurement Approach	3-hour max pressure drop readings taken electronically utilizing the mill's data acquisition system (PI).
II. Indicator Range	Established ranges for photo-helic gauge pressure drop readings are set based on control device manufacturer recommendations. Range is set at 0-5" $H_2O$ .
III. Performance Criteria	
A. Data Representativeness	Pressure taps are located at the filter bank inlet and outlet.
B. Verification of Operational Status	Pressure gauges are calibrated quarterly. Pressure taps are checked daily for plugging if required by gauge reading.
C. QA/QC Practices and Criteria	Pressure gauges are calibrated quarterly. Pressure taps are checked daily for plugging if required by the gauge reading.
D. Monitoring Frequency	Pressure drop monitored continuously as well as being recorded manually.
E. Data Collection Procedure	Data is continuously monitored with the mill's data acquisition system recording data from filter bank photo-helic gauges as well as being recorded manually.
F. Averaging Period	3-hour max is used to determine compliance.

5.B.22 For Emission Point BS-001, the permitte must demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in §§ 63.2240 and 63.2241 that apply by collecting and recording the operating parameter monitoring system data listed in Table 2 to Subpart DDDD for the process unit according to § 63.2269(a) through (b) and § 63.2270; AND reducing the operating parameter monitoring system data to the specified averages in units of the applicable requirement according to calculations in § 63.2270; AND maintaining the average operating parameter at or above the minimum, at or below the maximum, or within the range (whichever applies) established according to § 63.2262. (Ref. §63.2271(a)) and Table 7)

#### C. <u>Specific Reporting Requirements</u>

5.C.1 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 DEQ. Also, the DEQ shall be notified in writing at least ten (10) days prior to the scheduled test date(s) so that an observer may be afforded the opportunity to witness the test(s).

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

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

- 5.C.2 For all required testing, the permittee shall submit a test report of the results of the stack tests within forty-five (45) days of the test date, and by the date(s) otherwise required. (Ref.: 11 Miss. Admin Code Pt. 2, R. 6.3.A(3)(a)(2).)
- 5.C.3 If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the DEQ within 15 (fifteen) calendar days after the change. (Ref.: 40 CFR §63.5905)
- 5.C.4 For Emissions Points AL-101, AN-001, AN-002 the permittee shall submit a compliance report in accordance with 5.A.4 and it shall include the following information:
  - (a) The compliance report shall contain the following information:
    - (1) Company name and address;

- (2) Statement by a responsible official with that officials name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- (3) Date of the report and beginning and ending dates of the reporting period;
- (4) If there are no deviations from the work practice standards in 3.D.1, include a statement that there were no deviations from the work practice standards during the reporting period; and
- (b) For each deviation from a work practice standard in 3.D.1 that occurs, the compliance report shall contain 5.C.7(a)(1) through (3) and the following information:
  - (1) The total operating time of each affected source during the reporting period, and
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken.
- (Ref.: 40 CFR §63.5910(a) through (d))
- 5.C.5 For Emission Points AD-102, AD-103, AJ-102, and AJ-103, the permittee must submit the following notifications:
  - (a) Notification of Compliance Status
    - (1) Before a Title V permit has been issued to the permittee, and each time a notification of compliance status is required under this part, the permittee shall submit to MDEQ a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list:
      - (i) The methods that were used to determine compliance;
      - (ii) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
      - (iii) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
      - (iv) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in

units and averaging times and in accordance with the test methods specified in the relevant standard;

- (v) An analysis demonstrating whether the affected source is a major source or an area source (using the emissions data generated for this notification);
- (vi) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- (vii) A statement by the permittee as to whether the source has complied with the relevant standard or other requirements.
- (2) The notification shall be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in a relevant standard, in which case the letter shall be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). ). For example, the notification shall be sent before close of business on the 60th (or other required) day following completion of the initial performance test and again before the close of business on the 60th (or other required) day following the completion of any subsequent required performance test. If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with an opacity or visible emission standard under this part, the notification of compliance status shall be sent before close of business on the 30th day following the completion of opacity or visible emission observations. Notifications may be combined as long as the due date requirement for each notification is met.
- (3) After a Title V permit has been issued, the permittee shall comply with all requirements for compliance status reports contained in the source's Title V permit, including reports required under this part. After a Title V permit has been issued to the permittee, and each time a notification of compliance status is required under this part, the permittee shall submit the notification of compliance status to the appropriate permitting authority following completion of the relevant compliance demonstration activity specified in the relevant standard.
- (4) If the permittee submits estimates or preliminary information in the application for approval of construction or reconstruction required in §63.5(d) of Subpart A in place of the actual emissions data or control efficiencies required in paragraphs §§63.5(d)(1)(ii)(H) and (d)(2) of Subpart A, the permittee shall

submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section.

- (5) Advice on a notification of compliance status may be obtained from MDEQ. (40 CFR Part 63.9(h))
- 5.C.6 The permittee shall submit semiannual compliance reports for each affected source according to the requirements:
  - (a) The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in Condition 5.C.10(a)(2) of this section.
    - (1) Unless the MDEQ has approved a different schedule for submission of reports under §63.10(a) of Subpart A, the permittee must prepare and submit each semiannual compliance report according to the dates specified in Conditions 5.C.10 (a)(1)(i) through 5.C.10 (a)(1)(iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
      - (i) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
      - (ii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
      - (iii) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in Condition 5.C.10(a)(1)(iii).
    - (2) Inclusion with Title V report. Each affected source that has obtained a Title V operating permit pursuant to 40 CFR Part 70 or 40 CFR Part 71 must report all deviations as defined in Subpart QQQQ in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 71.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).

report includes all required information concerning deviations from any emission limitation in Subpart QQQQ, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

- (3) The semiannual compliance report must contain the information specified in Conditions 5.C.10(a)(3)(i) through 5.C.10(a)(3)(v), and the information specified in Conditions 5.C.10(a)(4) through 5.C.10(a)(6) and 5.C.12(a) of this section that is applicable to the permittee's affected source.
  - (i) Company name and address.
  - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - (iv) Identification of the compliance option or options specified in §63.4691 of Subpart QQQQ that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates the permittee used each option.
  - (v) If the permittee used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.4691(b) or (c) of Subpart QQQQ), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (4) If there were no deviations from the emission limitations in Conditions 5.B.21 and 5.B.24, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If the permittee used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7) of Subpart A, the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of- control during the reporting period.

- (5) For the emission rate without add-on controls option, if there was a deviation from the applicable emission limit, the semiannual compliance report must contain the information in Conditions  $5 \cdot C \cdot 10(a)(5)(i)$  through  $5 \cdot C \cdot 10(a)(5)(iii)$ .
  - The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit.
  - (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in §63.4751; and if applicable, the calculation used to determine the mass of organic HAP in waste materials according to 5.B.22(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
  - (iii) A statement of the cause of each deviation.

The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in Condition 5.C.10. (40 CFR Part 63, Subpart QQQQ §63.4720(a))

- 5.C.7 If the permittee used the emission rate with add-on controls option and the permittee had an SSM during the semiannual reporting period, the permittee must submit the following reports:
- 5.C.8 For Emission Points AL-008, AL-009, AL-010, AL-011, AL-012, AL-013, AL-014, AL-015, AN-001, and AN-002, the permittee shall maintain all applicable records in the following manner:
  - (a) The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1);
  - (b) As specified in 40 CFR §63.10(b)(1), the permittee shall keep each record for 5 (five) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record;
  - (c) The records shall be kept onsite for at least 2 (two) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee may keep the records offsite for the remaining 3 (three) years; and,

(d) The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

(Ref.: 40 CFR §63.5920)

- 5.C.9 For Emission Points AB-102, AI-102, AD-011, AJ-011, AE-004, AD-103, and AJ-103, the permittee shall submit semi-annual reports summarizing the CAM requirements (see Permit Conditions 5.B.53 and 5.B.54 and Appendix H) in accordance with Permit Condition 5.A.4, including each excursion and the associated corrective actions taken. Additionally, in accordance with 40 CFR 64, the permittee shall submit a Quality Improvement Plan (QIP) if there are excursions for a period of time exceeding five (5) percent of the duration of the operating time during a semi-annual reporting period. (Ref.: 40 CFR Part 64)
- 5.C.10 For Emission Points EG-001 through EG-004, except for monitor malfunctions, associated repairs required performance evaluations, and required quality assurance or control activities, the permittee must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (Ref: §63.6635(b))
- 5.C.11 For Emission Points EG-001 through EG-004, the permittee must not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. (Ref: §63.6635(c))
- 5.C.12 For Emission Points EG-001 through EG-004, the permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2c, of Subpart ZZZZ subpart that apply according to methods specified in Table 6 of Subpart ZZZZ.
  - (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - (b) Develop and follow an individual 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.
  - (Ref: §63.6640(a) and Table 6(9))

- 5.C.13 For Emission Points EG-001 through EG-004, the permittee must report each instance in which the operating limitation in Table 2c of Subpart ZZZZ was not met. These instances are deviations from the emission and operating limitations in Subpart ZZZZ. These deviations must be reported according to the requirements in § 63.6650. If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation applicable to the stationary RICE. (Ref: §63.6640(b))
- 5.C.14 For Emission Points EG-001 through EG-004, the permittee must keep records be in a form suitable and readily available for expeditious review according to § 63.10(b)(1). (Ref: §63.6660(a))
- 5.C.15 For Emission Points EG-001 through EG-004, as specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. (Ref: §63.6660(b))
- 5.C.16 For Emission Points EG-001 through EG-004, the permitee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). (Ref: §63.6660(c))
- 5.C.17 For Emission Point BS-001, at all time, the permittee must record the results of each inspection, calibration, and validation check. (Ref. §63.2269(c))
- 5.C.18 For Emission Point BS-001, except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not available for required calculations constitutes a deviation from the monitoring requirements. (Ref. §63.2270(b))
- 5.C.19 For Emission Point BS-001, the permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device

maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system. (Ref. §63.2270(c))

- 5.C.20 For Emission Point BS-001, except as provided in paragraph (e) of this section, determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (b) and (c) of this section). (Ref. §63.2270(d))
- 5.C.21 For Emission Point BS-001, to calculate the data averages for each 3-hour or 24-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data ( i.e. , not from periods described in paragraphs (b) and (c) of this section). (Ref. §63.2270(f))
- 5.C.22 For Emission Point BS-001, the permittee must report each instance in which the permittee did not meet each compliance option, operating requirement, and work practice requirement in Table 7 to Subpart DDDD that applies. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance as described in (b) and (c) below. These instances are deviations from the compliance options, operating requirements, and work practice requirements in Subpart DDDD. These deviations must be reported according to the requirements in § 63.2281.
  - (a) Consistent with §§ 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the Department's satisfaction that the permittee was operating in accordance with § 63.6(e)(1). The Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in § 63.6(e).
  - (b) Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if it is demonstrated to the Administrator's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. (Ref. §63.2271(b))
- 5.C.23 For Emission Point BS-001, the permittee shall submit the following:
  - (a) seminannual compliance report that contains information in §63.2281(c) through (g).
  - (b) immediate startup, shutdown, and malfunction report if the permittee had a startup, shutdown, or malfunction during the reporting period that is not consistent with the SSM Plan. The notification should contain the action taken for the event and should

be received by the Department within 2 working days, by fax or telephone. (Ref. §63.2281(b) and Table 9)

- 5.C.24 For Emission Point BS-001, the following reports are required:
  - (a) The first compliance report must be postmarked or delivered no later than July 31 or January 31 for compliance periods ending on June 30 and December 31, respectively.
  - (b) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - (c) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively.
  - (d) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates (a) through (c) above
- 5.C.25 For Emission Point BS-001, the compliance report must contain the information in paragraphs (a) through (e):
  - (a) Company name and address.
  - (b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - (c) Date of report and beginning and ending dates of the reporting period.
  - (d) If the permittee had a startup, shutdown, or malfunction during the reporting period and the permittee took actions consistent with the SSMP, the compliance report must include the information specified in § 63.10(d)(5)(i).
  - (e) A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in paragraphs (c)(5)(i) through (iii) of this section.
    - (1) The date and time when the control device was shut down and restarted.

- (2) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
- (3) A statement of whether or not the control device maintenance was included in the approved routine control device maintenance exemption developed pursuant to § 63.2251. If the control device maintenance was included in the approved routine control device maintenance exemption, then the permittee must report the information in paragraphs (c)(5)(iii)(A) through (C) of this section.
  - (i) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.
  - (ii) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period.
  - (iii) Based on the information recorded under paragraphs (c)(5)(iii)(A) and (B) of this section for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of this section.

$$RM = \frac{DT_p + DT_c}{PU_p + PU_c}$$

Where:

RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance;

 $PU_p = Process$  unit uptime for the previous semiannual compliance period;  $PU_c = Process$  unit uptime for the current semiannual compliance period;  $DT_p = Control device downtime claimed under the routine control device$ maintenance exemption for the previous semiannual compliance period; $<math>DT_c = Control device downtime claimed under the routine control device$ maintenance exemption for the current semiannual compliance period.

- (f) The results of any performance tests conducted during the semiannual reporting period.
- (g) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice

requirements in Table 8 to Subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.

- (h) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in § 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
  (Ref: §63.2281(c))
- 5.C.26 For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to Subpart DDDD that occurs at an affected source where the permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in Subpart DDDD, the compliance report must contain the information in 5.C.22(a) through (f) and in paragraphs (a) and (b) below. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
  - (a) The total operating time of each affected source during the reporting period.
  - (b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.(Ref: § 63.2281(d)
- 5.C.27 For each deviation from a compliance option or operating requirement occurring at an affected source where the permittee is using a CMS to comply with the compliance options and operating requirements in Subpart DDDD, the permittee must include the information in 5.C.22(a) through (f) and paragraphs (e)(1) through (11) of this section. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
  - (a) The date and time that each malfunction started and stopped.
  - (b) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (c) The date, time, and duration that each CMS was out-of-control, including the information in 63.8(c)(8).
  - (d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in the approved routine control device maintenance exemption; or during another period.

- (e) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
- (f) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
- (g) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
- (h) A brief description of the process units.
- (i) A brief description of the CMS.
- (j) The date of the latest CMS certification or audit.
- (k) A description of any changes in CMS, processes, or controls since the last reporting period.

(Ref: §63.2281(e))

- 5.C.28 For Emission Point BS-001, the permittee must report all deviations as defined in Subpart DDDD in the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to Subpart DDDD along with, or as part of, the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in Subpart DDDD, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. (Ref:§63.2281(g))
- 5.C.29 For Emission Point BS-001, the permittee must keep the records listed in (a) through (d) below:
  - (a) A copy of each notification and report that the permittee submitted to comply with Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in § 63.10(b)(2)(xiv).

- (b) The records in § 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
- (c) Documentation of the approved routine control device maintenance exemption, if the permittee requests such an exemption under § 63.2251.
- (d) Records of performance tests and performance evaluations as required in § 63.10(b)(2)(viii).

(Ref: 63.2282(a))

- 5.C.30 For Emission Point BS-001, the permittee must keep the records required in Tables 7 and 8 to Subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies to the permittee. (Ref: §63.2282(b))
- 5.C.31 For Emission Point BS-001, the permittee must keep all records as described in (a) through (c) below:
  - (a) The records must be in a form suitable and readily available for expeditious review as specified in § 63.10(b)(1).
  - (b) As specified in § 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - (c) The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to § 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.
    (Ref: 63.2283(a) through (c))
- 5.C.32 For Emission Point BS-001, the permittee shall submit a report to the DEQ if the annual emissions (tons/year), from the projects covered by the Permit to Construct issued on January14, 2009 and modified on June 25, 2009 and January 11, 2010, exceed the baseline actual emissions (as documented in the project application for permit to construct), by a significant amount for any regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented in the associated permit application. The permittee shall conduct this monitoring for a period of 10 years following resumption of regular operations after the change. Such report shall be submitted to the DEQ within 60 days after the end of such year.

The report shall contain the following:

- (a) The name, address, and telephone number of the major stationary source;
- (b) The annual emissions as calculated pursuant to 52.21(r)(6)(iii); and,
- (c) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).
- (Ref.: 11 Miss. Admin. Code Pt. 2 R.5.1 and 40 CFR 52.21(r)(6))

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# 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 <u>http://ecfr.gpoaccess.gov</u> 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 Subpart QQQQ 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 Subpart QQQQ are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

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

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

# **APPENDIX** A

### List of Abbreviations Used In this Permit

11 Miss Adm	in Code Pt 2 Ch 1	Air Emission Regulations for the Prevention, Abatement, and Control	
11 Miss. Admin. Code Pt. 2, Ch. 1.		of Air Contaminants	
11 Miss. Adm	nin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air	
		Emissions Equipment	
	nin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes	
	iin. Code Pt. 2, Ch. 4. iin. Code Pt. 2, Ch. 5.	Ambient Air Quality Standards Regulations for the Prevention of Significant Deterioration of Air	
11 Miss. Auf	iiii. Code I t. 2, Cli. J.	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. Adm	nin. 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 7		
CEM	Continuous Emission M		
CEMS	Continuous Emission M		
CFR	Code of Federal Regulat	ions	
CO	Carbon Monoxide		
COM	Continuous Opacity Mon	nitor	
COMS	Continuous Opacity Monitoring System		
DEQ	Mississippi Department	of Environmental Quality	
EPA	United States Environmental Protection Agency		
gr/dscf	Grains Per Dry Standard	Cubic Foot	
HP	Horsepower		
HAP	Hazardous Air Pollutant		
lbs/hr	Pounds per Hour		
M or K	Thousand		
MACT	Maximum Achievable Control Technology		
MM	Million		
	MMBTUH Million British Thermal Units per Hour		
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emissions Stan	dards For Hazardous Air Pollutants, 40 CFR 61	
	or		
		lards For Hazardous Air Pollutants for Source Categories, 40 CFR 63	
NMVOC	Non-Methane Volatile Organic Compounds		
NO <sub>x</sub>	Nitrogen Oxides		
NSPS	New Source Performance		
O&M	Operation and Maintena	nce	
PM	Particulate Matter		
$PM_{10}$	Particulate Matter less than 10 Fm in diameter		
ppm	Parts per Million		
PSD		t Deterioration, 40 CFR 52	
SIP	State Implementation Plan		
$SO_2$	Sulfur Dioxide		
TPY	Tons per Year		
TRS	Total Reduced Sulfur		
VEE	Visible Emissions Evaluation Volatile Hazardous Air Pollutant		
VHAP	Volatile Hazardous Air I Volatile Organic Compo		
VOC	volatile Organic Compo	unu	

#### APPENDIX B

### 40 CFR 63, SUBPART WWWW, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: REINFORCED PLASTIC COMPOSITES PRODUCTION

# APPENDIX C

# 40 CFR 63, GENERAL PROVISIONS

### APPENDIX D

## 40 CFR 63, SUBPART QQQQ, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: SURFACE COATING OF WOOD PRODUCTS

### APPENDIX E

### 40 CFR 63, SUBPART DDDD, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: PLYWOOD AND COMPOSITE WOOD PRODUCTS

#### APPENDIX E

### 40 CFR 63, SUBPART ZZZZ, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)

### APPENDIX G

# 40 CFR 64, COMPLIANCE ASSURANCE MONITORING

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# APPENDIX H

## COMPLIANCE ASSURANCE MONITORING PLANS

# APPENDIX I

# ROUTINE CONTROL DEVICE MAINTENANCE EXEMPTION DOCUMENTS