

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Roseburg Forest Products South LP, Taylorsville Composites
105F Smith County Road 25
Taylorsville, Mississippi
Smith 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: July 7, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: June 30, 2025

Permit No.: 2500-00084

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SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the

change;

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

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

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

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

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or

40 CFR 51.166;

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the

Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns

are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

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

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	The East Rock Dropout Screen Operation equipped with a cyclone for pneumatic transfer of material through the screens (Ref. No. CP-102).
AA-002	The West Rock Dropout Screen Operation equipped with a cyclone for pneumatic transfer of material through the screens (Ref. No. CP-112).
AA-003	The No.1 and No.2 Bauer Mills equipped with a cyclone for pneumatic transfer of material to the Face Dryer (Ref. No. CP-201).
AA-004	The No.3 and No.4 Bauer Mills equipped with a cyclone for pneumatic transfer of material to Core Dryer (Ref. No. CP-211).
AA-005	The Screening Process equipped with a baghouse for capture of fine particles for use as burner fuel at GP Plywood (Ref. No. CP-206).
AA-006	The Face Dryer, using the 30 MMBtu/hr wood-fired burner (Emission Point AA-008) and an independent 18 MMBtu/hr natural gas burner for backup. Particulate matter emissions are controlled by a dual cyclone (Ref. No. CP-204).
AA-007	The Core Dryer, using the 30 MMBtu/hr wood-fired burner (Emission Point AA-008) and an independent 18 MMBtu/hr natural gas burner for backup. Particulate matter emissions are controlled by a dual cyclone (Ref. No. CP-205).
AA-008	The 30 MMBtu/hr direct-fired, Roemmc (Ref. No. CP-299) wood burner. Under normal conditions, the dryer exhaust is vented to AA-006 and AA-007 to provide heat to the dryers; however, under throttling, startup, shutdown, and emergency conditions, it vents through an emergency modulating stack.
AA-009	The Former Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-402).
AA-010	The Prepress Reject Operation equipped with a baghouse for capture of material for reuse in the Core Blender (Ref. No. CP-403).
AA-011	The Top Head Sander Operation equipped with a baghouse for capture of dust for use as burner fuel at GP Plywood (Ref. No. CP-506).
AA-012	The Bottom Head Sander Operation equipped with a baghouse for capture of dust for use as burner fuel at GP Plywood (Ref. No. CP-516).
AA-013	The Specialty Saw Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-509B).
AA-014	The First Pass Sander Operation equipped with a baghouse for control of particulate matter emissions (Ref. No. CP-510).
AA-015	The Jenkins Saw Hog Operation equipped with a baghouse for capture of pneumatically conveyed material for reuse in the process(Ref. No. CP-502).
AA-017	The Particleboard Press Operation. Emissions are controlled by a biofilter. (Ref. No. CP-599)

Emission Point	Description
AA-018	The Process Building (Ref. No. CP-600) containing the following emission sources: the Board Cooling Operation (Ref. No. CP-522); the Urea Formaldehyde Storage Tanks; the Particleboard Storage Operation (Ref. No. CP-523).
AA-019	63 HP Back-up Emergency Generator with Propane Fired Engine (Existing Spark Ignition Stationary Reciprocating Internal Combustion Engine)
AA-022	Group 1 Miscellaneous Coating Operations including Logo Painting, Edge Sealing, and Grade Stamping (<i>Fugitive Source</i>)
AA-023	Face and Core Blenders (<i>Fugitive Source</i>)
AA-100	The Warehouse Building containing the following emission source, the Particleboard Storage Operation (Ref. No. CP-523) (<i>Fugitive Source</i>)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

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

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

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

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

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

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 1.3.F.	3.B.1	PM (filterable only)	$E = 4.1 p^{0.67}$
AA-006 AA-007	11 Miss. Admin. Code Pt. 2, R. 1.4.B(1).	3.B.2	SO ₂	500 ppm (volume)
AA-014	Federally Enforceable Construction Permit issued August 8, 1995	3.B.3	PM (filterable only)	1.0 lbs/hr, 4.38 tons/yr
AA-009 AA-014	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.4	PM (filterable only)	CAM Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-006 AA-007 AA-017 AA-022	40 CFR 63, Subpart DDDD NESHAP for Plywood and Composite Wood Products	3.B.5	HAP	General Applicability
	40 CFR 63.2231; 63.2232(a), (b), and (e); 63.2290; and Table 10 to Subpart DDDD			
	40 CFR 63.2250(a)-(c), Subpart DDDD	3.B.6	HAP	General Compliance Requirements
AA-017	40 CFR 63.2240(b) and Tables 1B and 2, Subpart DDDD	3.B.7	HAP	Compliance Options
	40 CFR 63.2251, Subpart DDDD and Appendix C of this permit	3.B.8	HAP	Routine Control Device Maintenance Exemption
AA-019	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines	3.B.9	HAP	General Applicability
	40 CFR 63.6585, 63.6590(a)(1)(ii), 63.6665, and Table 8, Subpart ZZZZ			
	40 CFR 63.6640(f), Subpart ZZZZ	3.B.10	HAP	Engine may be operated up to 100 hours per year in non-emergency situations
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.11	PM (filterable only)	0.6 lbs/MMBTU

3.B.1 For the entire facility, no person shall cause, permit, or allow the emission of particulate matter (filterable only) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship:

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. Conveyor discharge of 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.)

3.B.2 For Emission Points AA-006 and AA-007, the maximum discharge of sulfur oxides (measured as sulfur dioxide) from any process equipment shall not exceed 500 ppm (volume).

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

3.B.3 For Emission Point AA-014, the permittee shall limit emissions of Particulate Matter (filterable only) to 1.0 pounds per hour and 4.38 tons per year.

(Ref.: Federally Enforceable Construction Permit issued August 8, 1995)

3.B.4 For Emission Points AA-009 and AA-014, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

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

3.B.5 For Emission Points AA-006, AA-007, AA-017 and AA-022, the facility is subject to and shall comply with 40 CFR Part 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products and 40 CFR Part 63, Subpart A - General Provisions, as specified in Table 10 of Subpart DDDD.

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

3.B.6 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall comply with the following general compliance requirements:

(a) The permittee shall be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR 63, Subpart DDDD at all times, except during periods of process unit or control device start-up, shutdown, and malfunction; prior to process unit initial start-up, and during the routine control device maintenance exemption specified in 40 CFR 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 are not operating, or during periods start-up, shutdown, and malfunction. Start-up and shutdown periods must not exceed the minimum amount of time necessary for the events.

(b) The permittee shall operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions 40 CFR 63.6(e)(1)(i).

(c) The permittee shall develop a written start-up, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6 (e)(3).

(Ref.: 40 CFR 63.2250 (a)-(c), Subpart DDDD)

3.B.7 For Emission Point AA-017, the permittee shall meet one of the compliance options listed below. In addition, the permittee must also maintain the 24-hour block biofilter bed temperature within the range established during the performance test required in Condition 5.B.13 of this permit.

(a) Reduce emissions of total HAP, measured as THC (as carbon) a, by 90 percent; or

- (b) Limit emissions of total HAP, measured as THC (as carbon) to 20 ppmvd; or
- (c) Reduce methanol emissions by 90 percent; or
- (d) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (e) Reduce formaldehyde emissions by 90 percent; or
- (f) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

If the permittee chooses to comply with one of the concentration-based compliance options for a control system outlet (presented as option (b), (d), and (f) above), the permittee must have a capture device that either meets the definition of wood products enclosure in 40 CFR 63.2292 or achieves a capture efficiency of greater than or equal to 95 percent.

(Ref: 40 CFR 63.2240(b) and Tables 1B and 2, Subpart DDDD)

3.B.8 For Emission Point AA-017, the permittee is not required to comply with the corresponding compliance options or operating requirements during periods of maintenance covered in the approved Routine Control Device Maintenance Exemption (RCDME) found in Appendix C of this permit. Emissions must be minimized to the greatest extent possible when operating during these periods. Under the conditions for which this exemption was approved, the following maintenance activities are allowed under this exemption:

- (a) biofilter nozzle inspection and replacement;
- (b) biofilter plumbing inspection and repair;
- (c) biofilter media cleaning; and
- (d) biofilter media changeout.

The permittee shall limit the total downtime of the control device to less than 0.5 percent of the annual operating uptime.

(Ref.: 40 CFR 63.2251, Subpart DDDD, and Appendix C of this permit)

3.B.9 For Emission Point AA-019, the facility is subject to and shall comply with 40 CFR Part 63, Subpart ZZZZ - the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) and the applicable requirements of Subpart A - General Provisions, as required in Table 8 to Subpart ZZZZ.

(Ref.: 40 CFR 63.6585, 63.6590(a)(1)(ii), 40 CFR 63.6665, and Table 8, Subpart ZZZZ)

3.B.10 For Emission Point AA-019, the engine shall be considered emergency stationary RICE provided the engine only operates in emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate an engine according to the requirements in (a) through (c) below, the engine will not be considered an emergency engine and must meet all applicable requirements for non-emergency engines.

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

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

3.B.11 For Emission Point AA-019, 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).)

C. Insignificant and Trivial Activity Emission Limitations & Standards

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

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-006 AA-007	40 CFR 63.2241(a) and Table 3 of Subpart DDDD	3.D.1	HAP	Inlet Moisture Content \leq 30% and inlet dryer temperature \leq 600°F
AA-022	40 CFR 63.2241(a), 63.2292, and Table 3 of Subpart DDDD	3.D.2	HAP	Use Non-HAP Coatings Only
AA-019	40 CFR 63.6602, 63.6625(j) and Table 2c of Subpart ZZZZ	3.D.3	HAP	Maintenance Requirements
	40 CFR 63.6605(a) and (b), Subpart ZZZZ	3.D.4	HAP	General Compliance Requirements
	40 CFR 63.6625(e), (f) and (h), 63.6640(a), and Table 6, Subpart ZZZZ	3.D.5	HAP	Operating Requirements
AA-006 AA-007 AA-009 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10), as established in the Title V Operating Permit issued herein	3.D.6	PM (filterable only)	Operate and maintain control device at all times

3.D.1 For Emission Points AA-006 and AA-007, the permittee shall process furnish with a 24-hour block average inlet moisture content of less than or equal to 30 percent (by weight, dry basis) and operate with a 24-hour block average inlet dryer temperature of less than or equal to 600 °F.

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

3.D.2 For Emission Point AA-022, the permittee shall only use non-HAP coatings in all Group 1 Miscellaneous Coating operations. A non-HAP Coating is defined as a coating with HAP contents below 0.1 percent by mass for OSHA-defined carcinogens and below 1.0 percent by mass for other HAP compounds.

(Ref.: 40 CFR 63.2241(a), 63.2292, and Table 3 of Subpart DDDD)

3.D.3 Emission Point AA-019 is considered an existing spark ignition (SI) emergency stationary RICE with a site rating less than 500 brake HP located at a major source of HAP emissions and, as such, must comply with the following requirements except during periods of startup:

- (a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (b) Inspect spark plugs 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.
- (d) If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements in accordance with the schedule above or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the risk has abated. The work practice should be completed as soon as practicable after the emergency has ended or the risk has abated. The permittee should report any failure to perform the work practice according to the schedule above and describe the conditions for which the delay was necessary.
- (e) The permittee may also utilize the oil analysis program in 40 CFR 63.6625(j) to extend the specified oil change requirement.

(Ref.: 40 CFR 63.6602, 63.6625(j) and Table 2c of Subpart ZZZZ)

3.D.4 For Emission Point AA-019, the permittee shall, at all times, be in compliance with the applicable emission and operating limitations of Subpart ZZZZ and operate and maintain the engine, including associated air pollution control 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 Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the sources.

(Ref.: 40 CFR 63.6605(a) and (b), Subpart ZZZZ)

3.D.5 For Emission Point AA-019, the permittee shall:

- (a) Operate and maintain the engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

- (b) Install a non-resettable hour meter if one is not already installed
- (c) Minimize each engine's time spent at idle during startup and minimize each engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

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

- 3.D.6 For Emission Points AA-006, AA-007, AA-009, AA-013, and AA-014, the permittee shall operate and maintain each control device according to the manufacturer's specifications or develop an operation and maintenance plan which must provide to the extent practicable for the maintenance and operation of the control device in a manner consistent with good air pollution control practices for minimizing emissions.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit herein)

SECTION 4. COMPLIANCE SCHEDULE

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

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	PM (filterable only)	Stack testing once in the life of the permit and once every 5 years thereafter
AA-006 AA-007 AA-009 AA-013 AA-014 AA-017	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	PM (filterable only)	Record of operating and maintenance specifications and maintenance log
AA-006 AA-007 AA-009 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.3	Visible Emissions	Perform weekly visible emissions observations
AA-009 AA-014	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.4	Pressure Drop and Visible Emissions	CAM Requirements: Daily pressure drop and weekly visible emissions observations
	40 CFR 64.7(b) and (c), CAM	5.B.5	Operation & Maintenance	Operation and maintenance requirements for monitoring system(s)
	40 CFR 64.7(d), CAM	5.B.6	Corrective Action	Corrective Action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.7	QIP	Upon request by DEQ, develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b), CAM	5.B.8	CAM Records	Maintain CAM records as specified
AA-019	40 CFR 63.6655(a), (d), (e), and (f), 63.6660(b) and (c), Subpart ZZZZ	5.B.9	HAP	Monitoring and recordkeeping
AA-017	40 CFR 63.2262(a), (b), (c), (d)(1), (e), (g), (h), and (m); 63.2271(a); and Table 7 of Subpart DDDD	5.B.10	HAP	Stack testing biennially

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-006 AA-007 AA-017	40 CFR 63.2269(a), (b), and (c), Subpart DDDD	5.B.11	HAP	CPMS requirements
AA-006 AA-007 AA-017	40 CFR 63.2270 (a), (b), (c), (e), and (f), Subpart DDDD	5.B.12	HAP	Monitor operations at all times when the process is in operation
AA-017	40 CFR 63.2271(a) and Table 7 or Subpart DDDD	5.B.13	Biofilter Bed Temperature	Record it on 24-hour block average and maintain it within the range established in the previous stack test.
	40 CFR 63.2251, as approved December 17, 2007 – MDEQ Approval for RCDME in Appendix C of this permit	5.B.14	HAP	Record biofilter downtime as a result of maintenance
AA-006 AA-007	40 CFR 63.2271(a) and Table 8, Subpart DDDD	5.B.15	Inlet Moisture and Dryer Temperature	Maintain the 24-hour block average inlet moisture \leq 30% and inlet dryer temperature \leq 600°F
AA-022	40 CFR 63.2271(a) and Table 8, Subpart DDDD	5.B.16	HAP	Keep records of coatings
AA-006 AA-007 AA-017 AA-022	40 CFR 63.2282(a) and (b) and 63.2283(a),(b),(c), Subpart DDDD	5.B.17	HAP	Recordkeeping

5.B.1 For Emission Point AA-014, the permittee shall demonstrate compliance with particulate matter limitations and opacity by stack testing in accordance with EPA reference Methods 1-5 and 9 within five (5) years of permit issuance and once every five years thereafter. For the purposes of the compliance demonstration, the permittee shall operate the sander operation within 20% of the maximum rated capacity.

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

5.B.2 For Emission Points AA-006, AA-007, AA-009, AA-013, AA-014, and AA-017, the permittee shall maintain a record of the manufacturer's operation and maintenance specifications or site-specific plan developed by the permittee. The permittee shall maintain a log of maintenance conducted on each control device.

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

5.B.3 For Emission Points AA-006, AA-007, AA-009, AA-013 and AA-014, the permittee shall perform weekly observations for visible emissions for a minimum of six (6) consecutive minutes and maintain a log of the results. These observations shall be performed on each stack, but may be conducted from a location allowing the observation of multiple emission points simultaneously. If any visible emissions are observed, the permittee shall determine the cause of the visible emissions and take immediate corrective action to restore the equipment to normal operating conditions.

The permittee shall maintain a log of the visible emissions observations and any corrective actions taken and make the log available for review upon request from DEQ personnel.

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

- 5.B.4 For Emission Points AA-009 and AA-014, the permittee shall monitor the pressure drop across the baghouses daily and conduct weekly visible emissions observations in accordance with the CAM Plan found in Appendix D of the permit.

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

- 5.B.5 For Emission Points AA-009 and AA-014, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

(a) *Proper maintenance.* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

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

- 5.B.6 For Emission Points AA-009 and AA-014, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

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

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

- 5.B.7 For Emission Points AA-009 and AA-014, based on the results of a determination made under Condition 5.B.6, the DEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

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

- 5.B.8 For Emission Points AA-009 and AA-014, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.7 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

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

- 5.B.9 For Emission Point AA-019, the permittee shall maintain the following records and keep each readily accessible for at least five years after the date of each occurrence:
- (a) Copies of notifications and reports submitted to comply with Subpart ZZZZ;
 - (b) Records of the occurrence and duration of each malfunction;
 - (c) Records of any actions taken to minimize emissions during a malfunction, including corrective actions to restore a malfunctioning engine to its normal or usual manner of operation.
 - (d) All maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in Condition 3.D.5;
 - (e) Records of oil changes for the engine, including the results of any oil analyses performed according to Condition 3.D.3;

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

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

5.B.10 For Emission Point AA-017, the permittee shall conduct performance tests using the applicable method(s) specified in Table 4 of Subpart DDDD within two years following the previous performance test (last conducted January 7, 2019) and within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media. All performance testing shall be done in accordance with the following:

- (a) All tests must not be conducted during periods of startup, shutdown, or malfunction (SSM), and must be conducted under representative operating conditions as defined in 40 CFR 63.2292. The representative conditions must be described in the performance test report and shall include an explanation as to why they are representative.
- (b) Each performance test must contain three separate 1-hour test runs.
- (c) All sampling sites must be located at the inlet and outlet of the control device.
- (d) The permittee must collect operating parameter monitoring system must collect data at least once every 15 minutes during the entire performance test.
- (e) All non-detect data must be treated as one-half the method detection limit.
- (f) The percent reduction across the control device must be calculated using Equation 1 from 40 CFR 63.2262(h).
- (g) The biofilter operating requirements must be established as follows:
 - (1) During the performance test, the permittee must continuously monitor the biofilter bed temperature during each of the required 1-hour test runs. To monitor biofilter bed temperature, the permittee may use multiple thermocouples in representative locations throughout the biofilter bed and calculate the average biofilter bed temperature across these thermocouples prior to reducing the temperature data to 15-minute averages for purposes of establishing biofilter bed temperature limits. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs. The permittee may base the biofilter bed temperature range on values recorded during previous performance tests provided that the data used to establish the temperature ranges have been obtained using the test methods required in this subpart. If data from previous performance tests is used, the permittee must certify that

the biofilter and associated process unit(s) have not been modified subsequent to the date of the performance tests. Replacement of the biofilter media with the same type of material is not considered a modification of the biofilter for purposes of this section. The biofilter bed temperature operating range may be expanded by providing proper notification and conducting a repeat performance test.

(Ref.: 40 CFR 63.2262(a), (b), (c), (d)(1), (e), (g), (h), and (m); 63.2271(a); and Table 7 of Subpart DDDD)

5.B.11 For Emission Points AA-006, AA-007 and AA-017, the permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

- (a) Each CPMS must be able to complete one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
- (b) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment..
- (c) The permittee shall record the results of each inspection, calibration, and validation check.
- (d) For each temperature monitoring device, the permittee shall meet (a) through (c) above and shall meet the following requirements:
 - (1) Locate the temperature monitoring device in a position that provides a representative temperature;
 - (2) Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger;
 - (3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F
 - (4) Perform an electronic calibration at least semiannually in accordance with the manufacturer's owners manual. Following the electronic calibration, you must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.
 - (5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
 - (6) Inspect all components for integrity and all electrical connections for continuity, oxidation and galvanic corrosion at least quarterly.

- (e) For each furnish moisture meter, the permittee shall meet (a) through (c) above and shall meet the following requirements:
- (1) Use a continuous moisture monitor with a minimum accuracy of 1 percent (dry basis) moisture or better in the 25 to 35 percent (dry basis) moisture content range. Alternatively, the permittee may use a continuous moisture monitor with a minimum accuracy of 5 percent (dry basis) moisture or better for dry rotary dryers used to dry furnish with less than 25 percent (dry basis) moisture.
 - (2) Locate the moisture monitor in a position that provides a representative measure of furnish.
 - (3) Calibrate the moisture monitor per the manufacturer's specifications at least once per semiannual compliance period (or more frequently if recommended by manufacturer).
 - (4) Inspect all components of the moisture monitor for integrity and all electrical connections for continuity at least quarterly.
 - (5) Use the Equation 1 from 40 CFR 63.2269(c)(5) to convert percent moisture measurements wet basis to a dry basis.

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

5.B.12 For Emission Points AA-006, AA-007, and AA-017, the permittee shall monitor and collect data according to the following requirements:

- (a) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
- (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered under the routine control device maintenance exemption approved in Condition 3.B.8 in any data average or calculation used to report emission or operating levels, nor may it be used to meet

a minimum data availability requirement. The permittee must use all the data collected during all other periods in assessing the operation of the control system.

- (c) The permittee shall determine the 24-hour block average of all recorded readings, calculated every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours. To calculate the 24-hour data average, the permittee must have at least 75 percent of the required readings for that period using only recorded readings that are based on valid data.

(Ref.: 40 CFR 63.2270 (a), (b), (c), (e), and (f), Subpart DDDD).

- 5.B.13 For Emission Point AA-017, the permittee shall demonstrate continuous compliance by collecting and recording the biofilter bed temperature, reducing the data to the 24-hour block average, and maintaining the average biofilter bed temperature within the range established in accordance with Condition 5.B.10(g).

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

- 5.B.14 For Emission Point AA-017, the permittee shall keep records of the control device downtime that occurs as a result of one of the maintenance activities listed in Condition 3.B.8 during the process operating uptime. Such information shall be maintained on a 365-day rolling total and reported in accordance with Condition 5.C.8.

(Ref.: 40 CFR 63.2251 and December 17, 2007, MDEQ Approval for RCDME in Appendix C of this permit).

- 5.B.15 For Emission Points AA-006 and AA-007, the permittee shall demonstrate continuous compliance by maintaining the 24-hour block average inlet moisture content at less than or equal to 30 percent (by weight, dry basis), maintaining the 24-hour block average inlet dryer temperature at less than or equal to 600°F, and keeping records of both.

(Ref.: 40 CFR 63.2271(a) and Table 8, Subpart DDDD).

- 5.B.16 For Emission Point AA-022, the permittee shall demonstrate continuous compliance by continuing to use non-HAP coatings and keeping records showing that only non-HAP coatings are used.

(Ref.: 40 CFR 63.2271(a) and Table 8, Subpart DDDD)

- 5.B.17 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall keep records of the following (if applicable):

- (a) A copy of each notification and report submitted to comply with Subpart DDDD.
- (b) All records related to startup, shutdown, and malfunction.
- (c) Documentation of the approved RCDME.
- (d) Records of performance tests and performance evaluations

- (e) Records that show continuous compliance with each compliance option, operating requirement and work practice requirement.

These records shall be available for review and must be kept for a period of five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Each record must be kept on site for at least two (2) years after the date and then may be kept offsite for the remaining three (3) years.

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

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-006 AA-007 AA-009 AA-013 AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	Visible Emissions	Report a summary of weekly visual emissions observations
AA-009 AA-014	40 CFR 64.9(a), CAM	5.C.2	CAM Reporting	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.3	CAM Modification	Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring
AA-006 AA-007 AA-017	40 CFR 63.2280 (g)(1) and (3), Subpart DDDD	5.C.4	HAP	Submit a notification 30 days before modifying the control system or changing a monitoring parameter
AA-006 AA-007 AA-017 AA-022	40 CFR 63.2281(a), (b), (c) and Table 9 of Subpart DDDD	5.C.5	HAP	Submit semi-annual report
	40 CFR 63.2271(b), 63.2281(e) and (g), Subpart DDDD	5.C.6	HAP	Submit deviations report
AA-017	40 CFR 63.2281(a) and Table 9, Subpart DDDD	5.C.7	SSM	Immediate report of SSM not consistent with SSMP
	40 CFR 63.2280(c), Subpart DDDD, and 63.7, Subpart A	5.C.8	Performance Test	Performance test notification and reporting
AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c).	5.C.9	Performance Test	Performance test notifications and reporting
AA-019	40 CFR 63.6640(b) and 63.6650(f), Subpart ZZZZ	5.C.10	Work Practice	Deviations reporting
	40 CFR 63.6640(b), 63.6650(c) and (d), Subpart ZZZZ	5.C.11	Operating Limit	Deviations reporting

- 5.C.1 For Emission Points AA-006, AA-007, AA-009, AA-013 and AA-014, the permittee shall submit a report summarizing the weekly visible emissions observations, in accordance with Condition 5.A.4 of this permit.

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

- 5.C.2 For Emission Points AA-009 and AA-014, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

- (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.7. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

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

- 5.C.3 For Emission Points AA-009 and AA-014, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

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

- 5.C.4 For Emission Points AA-006, AA-007 and AA-017, the permittee shall submit a notification within 30 days before taking any of the following actions:

- (a) Modifying or replacing the control system
- (b) Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter.

(40 CFR 63.2280(g)(1) and (3), Subpart DDDD)

5.C.5 For Emission Points AA-006, AA-007, AA-017 and AA-022, the permittee shall submit a compliance report containing the following information (if applicable) in accordance with Condition 5.A.4 of this permit:

- (a) Company name and address.
- (b) Statement by a responsible official certifying the truth, accuracy, and completeness of the report.
- (c) Date of the report and beginning and ending dates of reporting period.
- (d) If there was a startup, shutdown, or malfunction during the reporting period and actions were taken consistent with your SSMP, the compliance report must include the information specified in 40 CFR 63.10(d)(5)(i).
- (e) A description of any control device maintenance performed while the control device was offline and the process controlled was still operating, including the following:
 - (1) The date and time the control device was shut down and restarted;
 - (2) Identification of the process unit(s) that was operating and the number of hours that the process unit operated while the control device was offline;
 - (3) A statement concerning whether or not the control device maintenance was included in the RCDME. If control device maintenance was included in the RCDME, the following additional information must be included in the report:
 - (i) The total amount of time the process unit operated during the semiannual period and during the previous semiannual compliance period;
 - (ii) The total amount of time the process unit operated while the control device was down for maintenance covered by the RCDME during the semiannual period and during the previous semiannual compliance period; and
 - (iii) Based on the information recorded under paragraphs (i) and (ii) above, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of 40 CFR 63.2281(c)(5)(iii)(C)
- (f) The results of any performance tests conducted during the semiannual reporting period.
- (g) If there were no deviations from any applicable compliance option, operating requirement, or work practice requirements in Table 8 of Subpart DDDD, a statement that there were no such deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.

- (h) If there were no periods during which a continuous monitoring system (CMS) was out-of-control, a statement that there were no out-of-control periods during the reporting period.

(Ref.: 40 CFR 63.2281(a), (b), (c), and Table 9 of Subpart DDDD)

5.C.6 For Emission Points AA-006, AA-007, AA-017, and AA-022, the permittee shall report all deviations identified in Condition 5.B.17 in the semiannual report required by Condition 5.A.4 of this permit. For each deviation from an applicable requirement (including those attributable to a startup, shutdown, malfunction and the RCDME), the permittee shall report the following information in addition to (a) through (f) in Condition 5.C.5 in the semiannual report:

- (a) The date and time each malfunction started and stopped
- (b) The date and time each CMS was inoperative, except for zero (low-level) and high-level checks.
- (c) The date and time each CMS was out of control, including the information in 40 CFR 63.8(c)(8).
- (d) The date and time 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 under the RCDME; 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 period.
- (h) A brief description of the process unit(s).
- (i) A brief description of the CMS.
- (j) The date of the last CMS certification or audit.
- (k) A description of any changes in CMS, processes, or controls since the last reporting period.

(Ref.: 40 CFR 63.2271(b), 63.2281(e) and (g), Subpart DDDD)

5.C.7 For Emission Point AA-017, the permittee shall submit an immediate startup, shutdown, and malfunction report if the event is not consistent with the SSMP developed pursuant to Condition 3.B.6. This report shall contain the actions taken for the event and shall be reported to the DEQ by telephone or fax within two (2) working days after starting actions inconsistent with the plan. A letter explaining the circumstances of the event; the reason(s) for not following the startup, shutdown, and malfunction plan; a description of any excess emissions and/or parameter monitoring exceedances which are believed to have occurred; and any actions that were taken to minimize emissions during the event shall be submitted to the DEQ under signature of the responsible official certifying the report's accuracy within seven (7) working days after the end of the event.

(Ref.: 40 CFR 63.2281(a) and Table 9 of Subpart DDDD)

5.C.8 For Emission Point AA-017, the permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, as specified in 40 CFR 63.7(b)(1). The DEQ may request to review the site-specific test plan required by 40 CFR 63.7(c). The permittee shall submit a report of the results of the performance test before the close of business on the 60th day following completion of the performance test.

(Ref.: 40 CFR 63.2280(c), Subpart DDDD, and 63.7, Subpart A)

5.C.9 For Emission Point AA-014, the permittee shall submit the following notifications and/or documents prior to conducting a stack test:

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

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

5.C.10 For Emission Point AA-019, the permittee shall report each deviation from a work practice requirement in Section 3.D of this permit in accordance with the semiannual compliance report required in Condition 5.A.4.

(Ref.: 40 CFR 63.6640(b) and 63.6650(f), Subpart ZZZZ)

5.C.11 For Emission Point AA-019, the permittee shall report each instance in which the operating limit in Table 2c of 40 CFR 63, Subpart ZZZZ was not met. These instances are deviations from the emission and operating limitations of the subpart. These deviations must be reported in a compliance report which shall contain the following information:

- (a) Company name and address.
- (b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) If there was a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.
- (e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
- (f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(Ref.: 40 CFR 63.6640(b), 63.6650(c) and (d), Subpart ZZZZ)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

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

APPENDIX B

List of Regulations Referenced In this Permit

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

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

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

40 CFR 82, Protection of Stratospheric Ozone

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

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

40 CFR 64, Compliance Assurance Monitoring

APPENDIX C

MDEQ APPROVAL OF ROUTINE CONTROL DEVICE MAINTENANCE EXEMPTION

APPENDIX D

CAM PLAN

The table below is the CAM plan for Emission Points AA-009 and AA-014

	Indicator No. 1	Indicator No. 2
I. Indicator Measurement Approach	Pressure Drop	Visible Emissions
	Daily pressure drop across the baghouse	Weekly visible emissions observation at the stack of each control device
II. Indicator Range	AA-009: 0.5- 5.0 in H ₂ O AA-014: 0.5- 5.0 in H ₂ O An excursion is defined as a pressure drop reading outside of the established range, which will trigger an immediate inspection and corrective action to return the baghouse to the appropriate range.	An excursion is defined as the presence of any visible emissions. Excursions trigger an immediate inspection and corrective action with follow-up visible emissions observation.
III. Performance Criteria		
A. Data Representiveness	Differential pressure gauges are located where a representative measurement can be determined through observation of the gauges.	Measurements are made at the emission point (Baghouse Exhaust).
B. Verification of Operational Status	Pressure drop gauges are installed pursuant to the manufacturer's specifications. Gauges are checked periodically as described below.	NA
C. QA/QC Practices and Criteria	The pressure gauges are installed in accordance with the manufacturer's specifications. Gauges are calibrated against a known source of pressure at least once annually or replaced. Calibration records identify the instrument calibrated, the date of calibration, the person who performed the calibration and the measurements observed.	The onsite person performing visible emissions observations is trained using the procedures in EPA Reference Method 22, which may be conducted by Roseburg personnel, or the procedures of Method 9, conducted by a certified third party. Documentation of training is maintained on site for each person trained.
D. Monitoring Frequency	Readings from the pressure drop gauges are recorded daily.	Visual observations are performed for six minutes weekly.
E. Data Collection Procedures	Records are maintained in a log located at the facility. Any corrective action taken in response to an excursion is also noted in the log.	Visible emissions observations are recorded and kept in a log, which includes the date, time, and results of the observations, the person conducting the observation, and any corrective action taken.
F. Averaging Period	Instantaneous, individual measurements are compared directly to the indicator range, without averaging.	Visual observation: 6 minute observation period