

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Winston Plywood and Veneer, LLC
1160 South Church Avenue
Louisville, Winston County, Mississippi

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

Permit Issued: December 20, 2018

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: November 30, 2023

Permit No.: 2980-00039

Modified: July 14, 2021; October 27, 2021

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (d) The fee shall be due September 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 MDEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

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

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

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

- (a) The changes are not modifications under any provision of Title I of the Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:
 - (1) A brief description of the change(s);
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in Part (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of the emergency the permittee took all reasonable steps to

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

- (4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

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

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

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

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

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

- 1.27 Regarding compliance testing (if applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

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

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide (Winston Plywood and Veneer, LLC)
AA-001	99.72 MMBTU / Hour Natural Gas-Fired Boiler [equipped with an oxygen trim system; constructed in February 2015]
AA-002	Debarking Operations
AA-003	Block Saw Operations
AA-004	Log Conditioning Operations
AA-005	Veneer Peeling and Clipping Operations
AA-006	Veneer Drying Operations [consists of three (3) dryers; Zone 1 of “Dryer M-208” contains a direct natural gas-fired burner (the remaining zones are indirect-fired); emissions from all dryers are routed to a regenerative thermal oxidizer (RTO)]
AA-007	Gluing and Pressing Operations
AA-008	Finishing Operations
AA-009	Cyclone System No. 1 [controls particulate matter (PM) emissions from the panel saw system and the saw trim hog in the Finishing Operations]
AA-010	Cyclone System No. 2 [controls particulate matter (PM) emissions from the Gluing and Pressing Operations and the spec. saw system in the Finishing Operations]
AA-011	Bag Filter System No. 3 [controls particulate matter (PM) emissions from the sander system and the sizer system in the Finishing Operations]
AA-012	99.72 MMBTU / Hour Natural Gas-Fired Boiler [equipped with an oxygen trim system; constructed in February 2015]
AA-013	99.72 MMBTU / Hour Natural Gas-Fired Boiler [equipped with an oxygen trim system; constructed in February 2015]
AA-014	Miscellaneous Coating Operations [includes (but not limited to) logo painting, edge sealing, and grade stamping]
AA-015	617 HP (460 kW) Diesel-Fired, Compression-Ignition Emergency Fire Water Pump Engine [heat input capacity: 1.57 MMBTU / hour; manufactured in 2016]
AA-016	Sander Dust Silo [equipped with a baghouse that controls particulate matter (PM) emissions from the sander system and the sizer system in the Finishing Operations]
AA-017	West Residuals Dust Bin [equipped with a cyclone that controls particulate matter (PM) emissions from Gluing and Pressing Operations and trimming operations associated with Finishing Operations]

Emission Point	Description
AA-018	29.5 HP Propane-Fired, Spark Ignition Emergency Generator Engine [4-stroke, rich burn; manufactured after June 2006]
AA-019	49 HP (36.5 kW) Diesel-Fired, Compression Ignition-Non-Emergency Generator Engine [heat input capacity: 0.13 MMBTU / hour; constructed after January 2021; provides combustion air to the Air Curtain Incinerator]
AA-020	Firebox Air Curtain Incinerator [used to dispose of clean lumber waste, wood waste, and yard waste generated on-site with a maximum charge rate of 6 tons/hour]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

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

- (a) Start-up operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations (i.e. ash removal) shall be permitted provided such emissions do not exceed sixty percent (60%) opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

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

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

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

3.A.3 The permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued August 4, 2015 and modified February 7, 2017 (PSD Avoidance Limit)	3.B.1	VOCs (as WPP1)	249.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.2	PM (filterable)	$E = 4.1(p^{0.67})$
AA-001 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.3	SO ₂	4.8 Pounds / MMBTU
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.4	PM (filterable)	$E = 0.8808(I^{-0.1667})$
	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued August 4, 2015 and modified February 7, 2017 (PSD Avoidance Limit)	3.B.5	Heat Input Rate	249.0 MMBTU / Hour (Rolling 3-Hour Average; For Combined Boilers)
	40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.40c(a); Subpart Dc	3.B.6	PM SO ₂	General Applicability
40 CFR Part 63, Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources 40 CFR 63.7485, 63.7490(a)(2) and (b), 63.7499(1), 63.7500(a)(1), and 63.7575; Subpart DDDDD	3.B.7	HAPs	General Applicability	
AA-006 AA-007 AA-014	40 CFR Part 63, Subpart DDDD – NESHAP for Plywood and Composite Wood Products 40 CFR 63.2231, 63.2232, and 63.2292; Subpart DDDD	3.B.8	HAPs	General Applicability
AA-006	40 CFR 63.2240(b) and Table 1B (Item 1); Subpart DDDD	3.B.9	HAPs	90% Reduction Efficiency (for RTO)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-006	40 CFR 63.2240(b) and Table 2 (Item 1); Subpart DDDD	3.B.10	HAPs	Maintain 3-Hour Block Average Firebox Temperature (for RTO)
	40 CFR 63.2250(d), (f)(1), (2), (4), and (5); Subpart DDDD	3.B.11		General Requirements
AA-009 AA-010 AA-011 AA-016 AA-017	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021 (PSD Avoidance Limit)	3.B.12	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirements (Control Devices)
AA-015 AA-018 AA-019	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.13	PM (filterable)	0.6 Pounds / MMBTU
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a) – (b), 63.6590(a)(2)(i) – (ii), (b)(1), (c)(4) and (7); Subpart ZZZZ	3.B.14	HAPs	General Applicability
AA-015 AA-018	40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ 40 CFR 60.4211(f)(1) – (3); Subpart IIII 40 CFR 60.4243(d)(1) – (3); Subpart JJJJ	3.B.15	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
AA-015 AA-019	40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i) – (ii); Subpart IIII	3.B.16	NMHC + NO _x PM CO	General Applicability
	40 CFR 60.4207(b); Subpart IIII	3.B.17	Fuel Requirement	15 ppm Sulfur Content (Max.); and 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
AA-015	40 CFR 60.4205(c), 60.4206, 60.4211(c), and Table 4; Subpart IIII	3.B.18	NMHC + NO _x	4.0 Grams per Kilowatt-Hour (or 3.0 Grams per Horsepower-Hour)
			PM	0.20 Grams per Kilowatt-Hour (or 0.15 Grams per Horsepower-Hour)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-018	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iv); Subpart JJJJ	3.B.19	HC + NO _x CO	General Applicability
	40 CFR 60.4231(c), 60.4233(c), and 60.4234; Subpart JJJJ 40 CFR 90.103 – Table 1; Subpart B	3.B.20	HC + NO _x	13.4 Grams / Kilowatt-Hour
			CO	519 Grams / Kilowatt-Hour
AA-019	60.4201(a), 60.4204(b), 60.4206, and 60.4211(c); Subpart IIII 40 CFR 1039.101 – Table 1; Subpart B	3.B.21	PM	0.03 Grams / Kilowatt-Hour
			NO _x + NMHC	4.7 Grams / Kilowatt-Hour
			CO	5.0 Grams / Kilowatt-Hour
AA-020	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(14)(e).	3.B.22	Buffer Zone Criteria	At Least 150 Feet From Any Dwelling or Light Commercial Building
	11 Miss. Admin. Code, Pt. 2, R. 1.3.H(1).	3.B.23	PM (filterable)	0.2 Grains / Dry Standard Cubic Foot (Calculated to 12% CO ₂ by Volume)
	40 CFR Part 60, Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units 40 CFR 60.2010 and 60.2015(a)(1); Subpart CCCC	3.B.24	Opacity	General Applicability
	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021 40 CFR 60.2265; Subpart CCCC	3.B.25	Waste Restriction	Only Incinerate Wood Waste, Clean Lumber, and Yard Waste Generated On-Site
	40 CFR 60.2250; Subpart CCCC	3.B.26	Opacity	≤ 35% During Start-Up Periods; and ≤ 10% During Operations
	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021	3.B.27	Maximum Hours of Operation	3,650 Hours / Year (Rolling 12-Month Total)

- 3.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit emission of volatile organic compounds (VOCs) as determined by the EPA Other Test Method 26 (OTM-26) to no more than 249.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued August 4, 2015 and modified February 7, 2017 – PSD Avoidance Limit)

- 3.B.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein or limited herein, the permittee shall not cause or allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the following relationship:

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

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.3 For Emission Points AA-001, AA-012, and AA-013, the maximum discharge of sulfur oxides shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per million BTU (MMBTU) heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.1.A(1).)

- 3.B.4 For Emission Points AA-001, AA-012, AA-013, the emission of particulate matter (PM) from each boiler shall not exceed an emission rate as determined by the following relationship:

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

Where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in MMBTU per hour.

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

- 3.B.5 For Emission Points AA-001, AA-012, and AA-013, the permittee shall limit the total heat input rate from the three (3) boilers combined to no more than 249.0 million BTU (MMBTU) per hour based on a rolling 3-hour average.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in Permit to Construct issued August 4, 2015 and modified February 7, 2017 – PSD Avoidance Limit)

- 3.B.6 For Emission Points AA-001, AA-012, and AA-013, the permittee is subject to and shall

comply with the applicable requirements found in 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

(Ref.: 40 CFR 60.40c(a); Subpart Dc)

- 3.B.7 For Emission Points AA-001, AA-012, and AA-013, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources.

For the purpose of this permit, Emission Points AA-001, AA-012, and AA-013 are classified as “new” (i.e. constructed after June 4, 2010) and “units designed to burn gas 1 fuels”.

(Ref.: 40 CFR 63.7485, 63.7490(a)(2) and (b), 63.7499(1), 63.7500(a)(1), and 63.7575; Subpart DDDDD)

- 3.B.8 For Emission Points AA-006, AA-007, and AA-014, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDD – NESHAP for Plywood and Composite Wood Products.

For the purpose of this permit, Emission Point AA-006 contains direct-fired softwood veneer dryer and indirect-fired softwood dryers. For Emission Point AA-007, while considered an affected source under Subpart DDDD, there are no specific requirements that apply to the noted operations.

(Ref.: 40 CFR 63.2231, 63.2232, and 63.2292; Subpart DDDD)

- 3.B.9 For Emission Point AA-006, the permittee shall operate the regenerative thermal oxidizer (RTO) in such a manner as to reduce the emission of hazardous air pollutants (HAPs) in total by ninety percent (90%) [measured as total hydrocarbons (as carbon)].

(Ref.: 40 CFR 63.2240(b) and Table 1B (Item 1); Subpart DDDD)

- 3.B.10 For Emission Point AA-006, the permittee shall maintain the 3-hour block average firebox temperature of the regenerative thermal oxidizer (RTO) above the minimum temperature established during the most recent performance test that demonstrates compliance with the HAP [measured as total hydrocarbons (as carbon)] destruction efficiency standard specified in Condition 3.B.9.

(Ref.: 40 CFR 63.2240(b) and Table 2 (Item 1); Subpart DDDD)

- 3.B.11 For Emission Point AA-006, the permittee shall comply with the applicable compliance options, operating requirements, and the work practice requirements found in Subpart DDDD when the dryers are operating, except for the following periods:

- (a) Prior to the initial start-up of a dryer.
- (b) Safety-related shutdowns conducted in accordance with Condition 3.D.5(a). However, the permittee shall minimize the length of time when compliance options and operating requirements are not met due to safety-related shutdowns.
- (c) The start-up and shutdown of a gas-fired burner in a direct-fired softwood veneer dryer conducted in accordance with Condition 3.D.5(c).

For the purpose of this permit, a gas-fired burner shut-off as a result of a production stoppage (partial or full) or an over-temperature event shall be considered a shutdown and not a malfunction. Likewise, the lighting or re-lighting of a gas-fired burner shall be considered a start-up and not a malfunction.

(Ref.: 40 CFR 63.2250(d), (f)(1), (2), (4), and (5); Subpart DDDD)

- 3.B.12 For Emission Points AA-009, AA-010, AA-011, AA-016, and AA-017, the permittee shall at all times operate each air pollution control device during active gluing and pressing operations and/or finishing operations (as applicable) to minimize the emission of filterable particulate matter. If the event that a control device malfunctions or becomes non-operational, the permittee shall cease activity at the applicable operation(s) until the control device returns to service.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021 – PSD Avoidance Limit)

- 3.B.13 For Emission Points AA-015, AA-018, and AA-019, the maximum permissible emission of ash and/or particulate matter (PM; filterable) shall not exceed 0.6 pounds per MMBTU per hour heat input.

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

- 3.B.14 For Emission Points AA-015, AA-018, and AA-019, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Stationary RICE is classified as “new” if construction or reconstruction commenced on / after December 19, 2002 (for Emission Point AA-015) or on / after June 12, 2006 (for Emission Points AA-018 and AA-019).

For the purpose of this permit, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements found in 40 CFR Part 60, Subpart JJJJ (for Emission Point AA-018) and 40 CFR Part 60, Subpart IIII (for Emission Point AA-019). No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a) – (b), 63.6590(a)(2)(i) – (ii), (b)(1), (c)(4) and (7); Subpart

ZZZZ)

3.B.15 For Emission Points AA-015 and AA-018, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the referenced regulation and shall meet all requirements for a corresponding non-emergency engine.

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
- (c) The permittee may operate an engine 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.

For Emission Point AA-018, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 63.6640(f)(1) – (3); Subpart ZZZZ)

(Ref.: 40 CFR 60.4211(f)(1) – (3); Subpart IIII)

(Ref.: 40 CFR 60.4243(d)(1) – (3); Subpart JJJJ)

3.B.16 For Emission Points AA-015 and AA-019, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

(Ref.: 40 CFR 60.4200(a)(2)(ii), Subpart IIII)

3.B.17 For Emission Points AA-015 and AA-019, the permittee shall only combust diesel fuel within each engine that meet the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) ppm; and
- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-

five (35) volume percent.

(Ref.: 40 CFR 60.4207(b); Subpart IIII)

3.B.18 For Emission Point AA-015, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
- (b) Particulate Matter (PM): 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain the engine in such a manner to achieve the noted emission standards over the entire life of the engine.

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

3.B.19 For Emission Point AA-018, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

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

3.B.20 For Emission Point AA-018, the permittee shall comply with the following emission standards:

- (a) Hydrocarbons + Nitrogen Oxides (HC + NO_x): 13.4 grams per kilowatt-hour; and
- (b) Carbon Monoxide (CO): 519 grams per kilowatt-hour.

The permittee shall operate and maintain the engine in such a manner to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4231(c), 60.4233(c), and 60.4234; Subpart JJJJ)

(Ref.: 40 CFR 90.103 – Table 1; Subpart B)

3.B.21 For Emission Point AA-019, the permittee shall comply with the following emission standards:

- (a) Particulate Matter (PM): 0.03 grams per kilowatt-hour;
- (b) Nitrogen Oxides + Non-Methane Hydrocarbons (NO_x + NMHC): 4.7 grams per kilowatt-hour; and

(c) Carbon Monoxide (CO): 5.0 grams per kilowatt-hour.

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain the engine in such a manner to achieve the noted emission standards over the entire life of the engine.

(Ref.: 60.4201(a), 60.4204(b), 60.4206, and 60.4211(c); Subpart III)

(Ref.: 40 CFR 1039.101 – Table 1; Subpart B)

3.B.22 For Emission Point AA-020, the permittee shall install and operate the air curtain incinerator (ACI) at least one hundred fifty (150) feet from any dwelling or any light commercial building not owned by the permittee and at least 150 feet from the nearest residential or recreational area.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(14)(a) and (e).)

3.B.23 For Emission Point AA-020, the maximum discharge of particulate matter (PM) from the ACI shall not exceed 0.2 grains per standard dry cubic foot calculated to twelve percent (12%) carbon dioxide (CO₂) by volume. This limitation shall apply when the ACI is operating at its designed capacity.

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

3.B.24 For Emission Point AA-020, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units.

(Ref.: 40 CFR 60.2010 and 60.2015(a)(1); Subpart CCCC)

3.B.25 For Emission Point AA-020, the permittee shall only incinerate a 100 percent mixture of wood waste, clean lumber waste, and/or yard waste generated on-site. For the purpose of this permit, the noted wastes are defined as such:

(a) “Wood waste” is defined as untreated wood and untreated wood products, including tree stumps (whole or chipped), trees, tree limbs (whole or chipped), bark, sawdust, chips, scraps, slabs, millings, and shavings.

(b) “Clean lumber waste” is defined as wood or wood products that have been cut or shaped and include wet, air-dried, and kiln-dried wood products (but does not wood products that have been painted, pigment-stained, or pressure-treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote); and

(c) “Yard waste” is defined as grass, grass clippings, bushes, shrubs, and clippings

from bushes and shrubs as a result of maintaining yards owned solely by the permittee.

(Ref.: 40 CFR 60.2245(b) and 60.2265; Subpart CCCC)

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021)

3.B.26 For Emission Point AA-020, the permittee shall comply the following opacity limitations:

- (a) Maintain an opacity of less than or equal to thirty-five percent (35%) during any start-up period in which “start-up” is considered the first thirty (30) minutes of operation; and
- (b) Except as provided in paragraph (a) of this condition and periods of malfunction, maintain an opacity of less than or equal to ten percent (10%) at all times.

(Ref.: 40 CFR 60.2250; Subpart CCCC)

3.B.27 For Emission Point AA-020, the permittee shall limit the hours of operation to no more than 3,650 hours per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

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

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

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

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide or SO₂) per MMBTU 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	Pollutant / Parameter	Work Practice Standard
AA-001 AA-012 AA-013	40 CFR 63.7500(a)(3); Subpart DDDDD	3.D.1	HAPs	Operate and Maintain Each Boiler in a Manner to Minimize Emissions
	40 CFR 63.7515(d), 63.7540(a)(10), (12), and (13); Subpart DDDDD	3.D.2	HAPs CO	Conduct Routine Tune-Ups
	40 CFR 63.7540(a)(12); Subpart DDDDD	3.D.3	Minimum Oxygen Concentration	Set the Level on the Oxygen Trim System
AA-006 AA-014	40 CFR 63.2250(g); Subpart DDDD	3.D.4	HAPs	General Duty Clause
AA-006	40 CFR 63.2241(a) and Table 3 (Items 3, 6, and 8); Subpart DDDD	3.D.5	HAPs	Follow Safety-Related Shutdown Requirements; Minimize Fugitive Emissions (Softwood Veneer Dryers); and Follow Start-Up / Shutdown Requirements (Direct-Fired Softwood Veneer Dryer)
AA-014	40 CFR 63.2241(a) and Table 3 (Item 5); Subpart DDDD	3.D.6	HAPs	Use Non-HAP Coatings in Group 1 Miscellaneous Operations
AA-015 AA-019	40 CFR 60.4211(a); Subpart III	3.D.7	NMHC + NO _x CO PM	Conduct Best Management Practices
AA-020	11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021	3.D.8	PM VOCs	Conduct Best Management Practices

3.D.1 For Emission Points AA-001, AA-012, and AA-013, the permittee shall operate and maintain each boiler (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.7500(a)(3); Subpart DDDDD)

3.D.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall conduct an initial performance tune-up on each boiler no later than September 6, 2021. Thereafter, the permittee shall conduct subsequent tune-ups on each boiler once every five (5) years and no later than sixty-one (61) months after the previously completed tune-up. Each tune-up shall be completed in accordance with the following specifications:

- (a) Inspect the burner (as applicable) and clean or replace any components of the burner as necessary. The permittee may delay the burner inspection specified until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every seventy-two (72) months.

At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspection, inspections are required only during planned entries into the storage vessel or process equipment.

- (b) Inspect the flame pattern (as applicable) and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications (if available).
- (c) Inspect the system controlling the air-to-fuel ratio (as applicable) and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown.
- (d) Optimize the total emission of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications (if available) and with any nitrogen oxides (NO_x) requirement to which the unit is subject.
- (e) Measure the concentrations in the effluent stream of CO in parts per million (by volume) and oxygen in volume percent before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

Additionally, the permittee shall maintain the following information for each boiler tune-up conducted:

- (f) The concentrations of CO in the effluent stream in parts per million by volume and oxygen in volume percent, measured at high fire or the typical operating load, before and after the tune-up of a boiler;
- (g) A description of any corrective actions taken as a part of the tune-up; and
- (h) The type and amount of fuel used over the twelve (12) months prior to the tune-up, but only if the boiler was physically and legally capable of using more than one (1) type of fuel during that period. Units sharing a fuel meter may estimate the fuel

used by each boiler.

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

(Ref.: 40 CFR 63.7515(d), 63.7540(a)(10), (12), and (13); Subpart DDDDD)

- 3.D.3 For Emission Points AA-001, AA-012, and AA-013, the permittee shall set the oxygen level concentration on the oxygen trim system no lower than the concentration measured during the most recent tune-up.

(Ref.: 40 CFR 63.7540(a)(12); Subpart DDDDD)

- 3.D.4 For Emission Points AA-006 and AA-014, the permittee must always operate and maintain the applicable process unit(s) (including air pollution control and monitoring equipment) in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by Subpart DDDD. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

The determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the MDEQ, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.2250(g); Subpart DDDD)

- 3.D.5 For Emission Point AA-006, the permittee shall adhere to the following work practice standards:

- (a) The permittee shall follow documented site-specific safety-related shutdown procedures (i.e. the use of automated controls or other measures that have been developed to protect workers and equipment) to ensure that the flow of raw materials (such as furnish or resin), fuel, or process heat (as applicable) cease and that material is removed from the dryer(s) as expeditiously as possible given the system design to reduce air emissions.
- (b) For a softwood veneer dryer, the permittee shall minimize fugitive emissions from the dryer doors (through proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).
- (c) For a direct-fired softwood veneer dryer during periods of start-up and shutdown, the permittee shall cease feeding green veneer into the dryer and minimize the amount of time the dryer is vented to the atmosphere.

(Ref.: 40 CFR 63.2241(a) and Table 3 (Items 3, 6, and 8); Subpart DDDD)

3.D.6 For Emission Point AA-014, the permittee shall use non-HAP coatings in all Group 1 miscellaneous coating operations. For the purpose of this permit, the following terms are defined as such:

- (a) A “non-HAP coating” is defined as a coating with a hazardous air pollutant (HAP) content below 0.1 percent by mass for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200 and below 1.0 percent by mass for other HAP compounds; and
- (b) A “Group 1 miscellaneous coating operation” is defined as the application of edge seals, nail lines, logo (or other information) paint, shelving edge fillers, trademark / grade-stamp inks, and wood putty patches to plywood (including synthetic patches).

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

3.D.7 For Emission Points AA-015 and AA-019, the permittee shall adhere to the following work practices:

- (a) Operate and maintain each engine and control device (if any) according to the manufacturer’s emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).

(Ref.: 40 CFR 60.4211(a); Subpart IIII)

3.D.8 For Emission Point AA-020, the permittee shall adhere to the following work practices:

- (a) The permittee shall operate and maintain the ACI in accordance with the manufacturer’s specifications to ensure the complete burning of material charged into the firebox. Additionally, the permittee shall maintain the manufacturer’s specifications on-site for review by MDEQ personnel (upon request).
- (b) After sufficient time for cooling, the permittee shall water ash within the ACI prior to its removal to prevent the ash from becoming airborne.
- (c) The permittee shall only utilize gasoline, kerosene, diesel fuel, natural gas, or liquefied petroleum as the fuel source for any start-up fire within the ACI. Additionally, the permittee shall minimize (to the best extent practicable) the amount of fuel necessary to ignite a start-up fire.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued July 14, 2021)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices by January 31 of each calendar year for the preceding calendar year. Each compliance certification shall include the following information:
- (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), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

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

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

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

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

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

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

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

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

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

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

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

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

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

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

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).	5.B.1	VOCs	Calculate and Record Emissions (Monthly and Rolling 12-Month Total)
AA-001 AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	Total Heat Input	Continuous Monitor the Hourly Heat Input of Each Boiler Determine the Total Average Heat Input (3-Hour Average)
	40 CFR 60.48c(g)(2); Subpart Dc	5.B.3	SO ₂	Record the Amount of Fuel Combusted in Each Boiler (Monthly)
	40 CFR 60.7(b); Subpart A	5.B.4	PM SO ₂	Maintain Records on Boiler Start-Up, Shutdown, and Malfunction Events
AA-006 AA-014	40 CFR 63.2271(b)(4), 63.2282(a) – (b) and (f), and Table 8 (Items 3, 5, 6, and 8); Subpart DDDD	5.B.5	HAPs	Recordkeeping Requirements
AA-006	40 CFR 63.2270(a) – (d), (f), and Table 7 (Item 1); Subpart DDDD	5.B.6	Combustion Temperature	Data Collection and Monitoring Requirements
	40 CFR 63.2262(a) – (h), Table 4 (Items 1 – 5), and Table 7 (Items 1 and 7); Subpart DDDD	5.B.7	HAPs	Conduct Routine Performance Testing
	40 CFR 63.2269(a) – (b); Subpart DDDD	5.B.8		Operate, Calibrate, and Maintain a Temperature Monitoring System
AA-009 AA-010 AA-011 AA-016 AA-017	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.9	Opacity	Perform Weekly Visible Emission Observations
		5.B.10	PM / PM ₁₀ / PM _{2.5} (filterable only)	Perform a Monthly Inspection on Each Air Pollution Control Device
AA-015 AA-018 AA-019	40 CFR 60.4214(a)(2)(i) – (iii); Subpart IIII 40 CFR 60.4245(a)(1) – (3); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.11	HC + NO _x NMHC + NO _x CO PM	Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-015 AA-018	40 CFR 60.4214(b), Subpart III 40 CFR 60.4245(b); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.12	Emergency Engine Status	Record Hours of Operation (Emergency and Non-Emergency)
AA-015 AA-019	40 CFR 60.4211(g)(1) and (3); Subpart III	5..B.13	NMHC + NO _x CO PM	Perform Compliance Actions (As Applicable)
AA-018	40 CFR 4243(a)(2)(i); Subpart JJJJ	5.B.14	HC + NO _x CO	Perform Compliance Actions (As Applicable)
AA-020	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.15	PM Opacity	Conduct an Annual Inspection
	40 CFR 60.2255; Subpart CCCC 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.16	Opacity	Conduct Routine Method 9 Testing
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2). 40 CFR 60.2260(b) and (f); Subpart CCCC	5.B.17	Hours of Operation Opacity	Maintain Documentation on Required Information

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall demonstrate compliance with emission limitation specified in Condition 3.B.1 by calculating and recording the total emission of volatile organic compounds (VOCs) from all sources that can reasonably emit the pollutant(s) in tons both on a monthly and rolling 12-month total basis.

Unless otherwise specified herein, the permittee shall include all reference data used to validate calculated emissions from each source (e.g. operational data, applicable emission factors, engineering judgement determinations, performance testing results, etc.).

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

5.B.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall demonstrate compliance with the limitation specified in Condition 3.B.5 by continuously monitoring and recording the heat input of each boiler. This monitoring data shall be utilized to determine the total heat input from the combined boilers based on a rolling 3-hour average.

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

- 5.B.3 For Emission Points AA-001, AA-012, and AA-013, the permittee shall record and maintain the amount of fuel combusted within a boiler during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2); Subpart Dc)

- 5.B.4 For Emission Points AA-001, AA-012, and AA-013, the permittee shall maintain records on the following information (as applicable):

- (a) The occurrence and duration of any start-up, shutdown, or malfunction of a boiler;
- (b) Any malfunction of air pollution control equipment associated with a boiler; and
- (c) Any periods in which a continuous monitoring system or monitoring device associated with a boiler is non-operational.

(Ref.: 40 CFR 60.7(b); Subpart A)

- 5.B.5 For Emission Points AA-006 and AA-014, the permittee shall maintain documentation on the following information (as applicable):

- (a) A copy of each notification and report submitted to comply with Subpart DDDD (including all supporting documentation);
- (b) Records [as specified in 40 CFR 63.2282(a)(2)(i) – (iv), Subpart DDDD] related to start-up and shutdown, failures to meet applicable standards, and actions taken to minimize emissions ;
- (c) A copy of all documentation concerning the approved routine control device maintenance (RCDME);
- (d) The results for all performance tests and continuous monitoring system (CMS) performance evaluations;
- (e) Records that document the procedures to minimize fugitive emissions from the dryers are being followed;
- (f) Records that demonstrate only non-HAP coatings are being used in all Group 1 miscellaneous coating operations;
- (g) Records that demonstrate the requirements for a safety-related shutdown of a dryer and/or the RTO are being followed;
- (h) Records that demonstrate the requirements for undergoing a start-up or shutdown

of a gas-fired burner for a direct-fired softwood veneer dryer are being followed.

- (i) The written CMS quality control procedures and program of corrective action [as specified in 40 CFR 63.8(d)(2), Subpart A] for the life of the process unit (or until the process unit is no longer subject to Subpart DDDD).

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

Instances when the work practice standards outlined in Condition 3.D.5(a) and (c) are used shall not be considered deviations from (or violations of) the otherwise applicable compliance option(s), operating requirement(s), and the work practice standards outlined in Conditions 3.D.5(b) and 3.D.6.

(Ref.: 40 CFR 63.2271(b)(4), 63.2282(a) – (b) and (f), and Table 8 (Items 3, 5, 6, and 8); Subpart DDDD)

5.B.6 For Emission Point AA-006, the permittee shall monitor and collect data from the regenerative thermal oxidizer (RTO) in accordance with the following specifications:

- (a) As appropriate, the permittee shall conduct all monitoring in continuous operation at all times the process unit is operating except during periods of monitor malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments – as applicable)
- (b) For purpose of calculating data averages, the permittee **shall** not use data recorded during periods of monitoring malfunction, associated repair, out-of-control periods, and required quality assurance / control activities. However, the permittee **may** not use data recorded during the following periods:
 - (1) Safety-related shutdown;
 - (2) Start-up and shutdown of a gas-fired burner in a direct-fired softwood veneer dryer; or
 - (3) Periods of control device downtime covered in any approved routine control device maintenance exemption (RCDME) in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling in a minimum data availability requirement (if applicable).

Data collected during all other periods shall be used in assessing compliance and operation of the RTO.

For the purpose of this permit, 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 calibrations constitutes a deviation from the monitoring requirements.

- (c) The permittee shall determine the 3-hour block average of all recorded readings calculated after every three (3) hours of operation as the average of the evenly spaced recorded readings in the previous three (3) operating hours [excluding the periods described in paragraphs (a) and (b) of this condition].
- (d) To calculate the data averages for each 3-hour averaging period, the permittee shall have at least seventy-five percent (75%) of the required recorded readings for that period using only recorded readings that are based on valid data.

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

- 5.B.7 For Emission Point AA-006, the permittee shall demonstrate compliance with the hazardous air pollutant (HAP) destruction efficiency limitation specified in Condition 3.B.10 by conducting a performance test no later than August 13, 2023. Thereafter, subsequent performance testing shall take place no later than sixty (60) months after the previously completed test.

Each performance test shall be conducted in accordance with the requirements outlined in 40 CFR 63.2262(a) – (h) and Table 4 (Items 1 – 5); Subpart DDDD.

During a performance test, the permittee shall continuously monitor the firebox temperature during each of the required 1-hour test runs. However, the permittee may measure the temperature in multiple locations (e.g. one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature.

The minimum firebox temperature shall then be established as the average of the three (3) minimum 15-minute firebox temperatures monitored during the 3 test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

The permittee may establish a different minimum firebox temperature for the RTO by conducting a repeat performance test (in accordance with the requirements specified in this condition) that demonstrates compliance with the destruction efficiency referenced in Condition 3.B.10.

(Ref.: 40 CFR 63.2262(a) – (h), Table 4 (Items 1 – 5) and Table 7 (Items 1 and 7); Subpart DDDD)

- 5.B.8 For Emission Point AA-006, upon establishing a minimum firebox temperature that demonstrates compliance with Condition 3.B.10, the permittee shall operate and maintain the continuous monitoring system (CMS) for temperature in accordance with the following specifications to demonstrate continuous compliance:
- (a) The continuous monitoring system shall be capable of completing a minimum one cycle of operation (i.e. sampling, analyzing, and recording) for each successive 15-minute period;
 - (b) The permittee shall maintain the equipment for the CMS at all times including (but not limited to) the parts necessary for routine repairs of equipment;
 - (c) The permittee shall record and maintain the results of each inspection and validation check;
 - (d) The permittee shall locate the temperature sensor in a position that provides a representative temperature;
 - (e) The permittee shall use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the minimum required firebox temperature (whichever is larger);
 - (f) The permittee shall validate the temperature sensor's reading at least semi-annually in accordance with the requirements specified in 40 CFR 63.2269(b)(4)(i) – (v), Subpart DDDD;
 - (g) The permittee shall conduct validation checks using the procedures as specified in paragraph (f) any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and
 - (h) The permittee shall inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosions at least quarterly.

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

- 5.B.9 For Emission Points AA-009 through AA-011, AA-016, and AA-017, the permittee shall perform a weekly visible emissions observation in accordance with EPA Test Method 22 on the exhaust of each air pollution control device during daylight hours and during representative operating conditions. Each observation shall be conducted for a minimum period of six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall immediately perform a visible emissions evaluation (VEE) in accordance with EPA Test Method 9. In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE.

The permittee shall maintain all documentation and information specified by EPA Test

Method 22 and/or EPA Test Method 9, any corrective actions taken to prevent or minimize emissions as a result of the evaluation, and the date / time when each observation / evaluation was conducted.

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

- 5.B.10 For Emission Points AA-009 through AA-011, AA-016, and AA-017, the permittee shall perform a monthly inspection on each air pollution control device. If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the control device as originally designed. Additionally, preventative maintenance shall be performed (as necessary) to maintain proper operation of a control device.

The permittee shall maintain documentation that details the date / time each inspection performed, any noted problem experienced, any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed, and any periods of time (including date and duration) in which a control device was non-operational during active operations.

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

- 5.B.11 For Emission Point AA-015, AA-018, and AA-019, the permittee shall maintain records that detail the following information:
- (a) All notifications submitted to comply with either 40 CFR Part 60, Subpart IIII or 40 CFR Part 60, Subpart JJJJ;
 - (b) Any maintenance conducted on an engine;
 - (c) The manufacturer's emission-related written instructions for an engine; and
 - (d) Documentation from the manufacturer that indicate an engine is certified to meet the respective emission standards specified in Conditions 3.B.18, 3.B.20, and 3.B.21.

(Ref.: 40 CFR 60.4214(a)(2)(i) – (iii); Subpart IIII)

(Ref.: 40 CFR 60.4245(a)(1) – (3); Subpart JJJJ)

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

- 5.B.12 For Emission Points AA-015 and AA-018, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall detail (in writing) and maintain what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4214(b), Subpart IIII and 40 CFR 60.4245(b); Subpart JJJJ)

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

- 5.B.13 For Emission Points AA-015 and AA-019, if the permittee does not operate and maintain an engine in accordance with the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance with the respective emission standards specified in Conditions 3.B.18 and 3.B.21 through the following actions:
- (a) Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate an engine in a manner consistent with good air pollution control practice for minimizing emissions.
 - (b) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of start-up, or within one (1) year after an engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.
 - (c) For Emission Point AA-015, in addition to paragraphs (a) and (b) of this condition, the permittee shall conduct subsequent performance testing every 8,760 hours or three (3) years (whichever comes first).

Any required performance test shall be conducted in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart IIII (as applicable).

(Ref.: 40 CFR 60.4211(g)(1) and (3); Subpart IIII)

- 5.B.14 For Emission Point AA-018, if the permittee does not operate and maintain the engine in accordance with the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance with the emission standards specified in Condition 3.B.20 through the following actions:
- (a) Keep a maintenance plan;
 - (b) Maintain records of conducted maintenance; and
 - (c) Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to the extent practicable).

(Ref.: 40 CFR 4243(a)(2)(i); Subpart JJJJ)

- 5.B.15 For Emission Point AA-020, the permittee shall conduct and record an inspection of the ACI in accordance with the manufacturer's recommendations on an annual basis (at a minimum) and not to exceed twelve (12) months after the previously completed

inspection.

If any problem is noted during an inspection, the permittee shall perform and record the necessary maintenance activities to ensure operation of the ACI as originally designed. The records for each inspection (and any maintenance performed) shall be maintained and made available to the MDEQ (upon request).

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

5.B.16 For Emission Point AA-020, the permittee shall demonstrate compliance with the opacity limits specified in Condition 3.B.26 by conducting routine opacity testing on the exhaust emitted from the ACI in accordance with EPA Test Method 9 (i.e. "Method 9") and the following requirements:

- (a) The initial testing shall be conducted no later than sixty (60) days after the ACI reaches the maximum charge rate at which it will operate but no later than January 15, 2022. Thereafter, subsequent testing shall be conducted on an annual basis not to exceed twelve (12) months after the previously completed evaluation.
- (b) Each test (or part of a test) shall be performed during daylight hours and during representative operating conditions.
- (c) Unless otherwise specified herein, the result of each test shall be determined from the average of three (3) 1-hour blocks. Each block shall consist of the average from ten (10) 6-minute evaluations, and each 6-minute evaluation shall be the average of twenty-four (24) total consecutive observations completed once every fifteen (15) seconds.
- (d) For the initial testing to demonstrate compliance with Condition 3.B.26(a), the permittee shall evaluate six (6) separate start-up periods in order to satisfy the criteria outlined in paragraph (c) of this condition.

For any subsequent testing, the permittee may demonstrate compliance with the noted opacity limit by evaluating (at a minimum) one (1) start-up period.

- (e) For the initial testing to demonstrate compliance with Condition 3.B.26(b), the permittee shall evaluate an operational period (or number of operational periods, except for periods of malfunction or start-up) that satisfies the criteria outlined in paragraph (c) of this condition.

For any subsequent testing, the permittee shall evaluate an operational period (or number of operational periods, except for periods of malfunction or start-up) within the applicable 12-month span that satisfies the criteria outlined in paragraph (c) to the best extent practicable. If the total operational period does not satisfy the criteria outlined in paragraph (c), the permittee shall determine a result from the completed testing and maintain documentation that details the duration of the non-

evaluated period (and why the permittee was unable to evaluate the noted period).

(Ref.: 40 CFR 60.2255; Subpart CCCC)

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

5.B.17 For Emission Point AA-020, the permittee shall maintain documentation that contain the following information:

- (a) The hours of operation in which the authorized wastes (as specified in Condition 3.B.25) are incinerated on a monthly basis;
- (b) The results from the initial and annual opacity tests in either paper copy or electronic format for at least five (5) years; and
- (c) A copy of the initial and annual reports on-site for a period of five (5) years.

(Ref.: 40 CFR 60.2260(b) and (f); Subpart CCCC)

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

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOCs	Submit a Semi-Annual Monitoring Report on Emissions
AA-001 AA-012 AA-013	40 CFR 63.7550(b)(1) – (4), (c)(1), and (h)(3); Subpart DDDDD	5.C.2	HAPs	Submit a 5-Year Compliance Report on Tune-Ups
AA-006 AA-014	40 CFR 63.2271(b), 63.2281(a), (b)(1) – (4) and (6), (c) – (e), (h), and Table 9 (Item 1); Subpart DDDD	5.C.3	HAPs	Submit a Semi-Annual Compliance Report
AA-006	40 CFR 63.2280(g); Subpart DDDD	5.C.4	HAPs	Submit Notification on Change of Continuous Monitoring Parameter
	40 CFR 63.2280(c), Subpart DDDD	5.C.5		Submit Notice of Intent for Performance Test
	11 Miss. Admin. Code Pt. 2, R. 2.6.B(5).			Submit 10-Day Notification of Performance Testing Event
	40 CFR 63.2281(a), (i), and Table 9; Subpart DDDD	5.C.6		Submit Performance Test Results
AA-009 through AA-011 AA-016 AA-017	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.7	Opacity PM / PM ₁₀ / PM _{2.5} (filterable only)	Submit a Semi-Annual Monitoring Report on Specific Operational Occurrences
AA-015 AA-018	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.8	Emergency Engine Status	Submit Semi-Annual Monitoring Report on Hours of Operation
AA-020	40 CFR 60.2260(d); Subpart CCCC	5.C.9	Opacity	Submit Method 9 Test Results
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.10	Hours of Operation	Submit a Semi-Annual Monitoring Report on the Hours of Operations

5.C.1 For Emission Point AA-000, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the total emission of volatile organic compounds (VOCs) in tons on a rolling 12-month total basis. The report shall also include all reference data (e.g. operational data, applicable emission factors, engineering judgement determinations, performance testing results, etc.) used to calculate the emissions from each applicable source.

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

- 5.C.2 For Emission Points AA-001, AA-012, and AA-013, the permittee shall submit a five-year compliance report to the MDEQ postmarked no later than January 31 of the following calendar year for the preceding 5-year period for each boiler.

The initial compliance report shall cover the period that begins on the initial start-up of each boiler and ends on December 31 within a five-year period. Thereafter, all subsequent compliance reports shall cover from January 1 to December 31 within each five-year period.

Each compliance report shall contain the following information:

- (a) The company and facility name;
- (b) Applicable process unit information, emissions limitations, and operating parameter limitations;
- (c) The date of the report;
- (d) The beginning and ending dates of the reporting period;
- (e) The date of the most recent tune-up for each boiler and
- (f) The date of the most recent burner inspection for each boiler (if it was not done on a five-year period and was delayed until the next scheduled / unscheduled boiler shutdown); and
- (g) A statement by a responsible official (with that official's name, title, and signature) certifying the truth, accuracy, and completeness of the content of the report.

The permittee shall also submit each compliance report to the EPA via CEDRI, which can be accessed through EPA's CDX website. The electronic submittal shall be made in accordance with 40 CFR 63.7550(h)(3), Subpart DDDDD.

(Ref.: 40 CFR 63.7550(b)(1) – (4), (c)(1), and (h)(3); Subpart DDDDD)

- 5.C.3 For Emission Points AA-006 and AA-014, the permittee shall submit a semi-annual compliance report in accordance with Condition 5.A.4 that contains the following information:

- (a) Each instance in which a compliance option, operating requirement, or work practice requirement in specified Tables 7 and 8 of Subpart DDDD was not met. This includes during a period of start-up, shutdown, malfunction, or a RTO maintenance period. These instances are deviations and must be reported in accordance with Condition 5.A.5.
- (b) The company name and address.

- (c) A statement by a responsible official (with that official's name, title, and signature) certifying the truth, accuracy, and completeness of the content of the report.
- (d) The number of instances and the total amount of time during the reporting period in which each of the start-up / shutdown work practices outlined in Condition 3.D.5(a) and (c) are used in place of the otherwise applicable compliance option(s), operating requirement(s), and work practice(s).

If a noted start-up / shutdown work practice is used for more than a total of one hundred (100) hours during a reporting period, the permittee shall report the date, time and duration of each instance when the start-up / shutdown work practice was used.

- (e) A description of any maintenance performed while the RTO was offline and one or more of the process units controlled by the RTO was operating, including the information specified below:
 - (1) The date and time when the RTO was shut down and restarted;
 - (2) The identification of the process units that were operating and the number of hours that each process unit operated while the RTO was off-line; and
 - (3) A statement of whether or not the RTO maintenance was included in an approved RCDME. If the control device maintenance was included in the RCDME, the report shall include the information specified in 40 CFR 63.2281(c)(5)(iii)(A) – (C), Subpart DDDD.
- (f) If there were no deviations from any compliance option or operating requirement, a statement that there were no deviations during the reporting period.
- (g) If there were no periods during which an applicable CMS was out-of-control, a statement that there were no periods during which the CMS was out-of-control during the reporting period.
- (h) For each deviation from a compliance option or operating requirement where a CMS is not used to comply, the report shall contain the information specified in paragraphs (a) – (e) of this condition as well as sub-paragraphs (1) and (2) below. This includes any periods of start-up, shutdown, malfunction, and routine control device maintenance:
 - (1) The total operating time of each affected process unit during the reporting period; and
 - (2) Information on the number, duration, and cause of deviations (including any unknown cause – if applicable) and the corrective action taken (as applicable).

- (i) For each deviation from a compliance option or operating requirement where a CMS is being used to comply, the report shall contain the information specified in paragraphs (a) – (e) of this condition as well as sub-paragraphs (1) – (13) below. This includes any periods of start-up, shutdown, malfunction, and routine control device maintenance:
 - (1) The date and time that each malfunction started and stopped;
 - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks;
 - (3) The date, time, and duration that each CMS was out-of-control, including the information specified in 40 CFR 63.8(c)(8), Subpart A.
 - (4) The date and time that each deviation started and stopped as well as whether each deviation occurred during one of the following periods:
 - (i) A period of start-up, shutdown, or malfunction;
 - (ii) A period of control device maintenance covered in the approved RCDME; or
 - (iii) During another period.
 - (5) 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.
 - (6) 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.
 - (7) 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.
 - (8) A brief description of the process unit(s).
 - (9) A brief description of the CMS.
 - (10) The date of the latest CMS certification or audit.
 - (11) A description of any changes to the CMS, processes, or controls since the last reporting period.

- (12) For any failure to comply with Condition 3.B.9, provide an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions.
- (13) The total operating time of each affected source during the reporting period.

In addition to submitting the semi-annual compliance reports to the MDEQ, the permittee shall also submit semi-annual compliance reports to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) no later than one (1) year after the reporting template specific to Subpart DDDD has been available. CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov>) and the appropriate reporting template (if available) can be found on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). **Do not use CEDRI to submit any information claimed to be “confidential business information” (CBI).**

If the reporting form for the semi-annual compliance report specific to Subpart DDDD is not available in CEDRI at the time that this report is due, the permittee shall submit the report to the EPA at the appropriate address listed in 40 CFR 63.13, Subpart A. Additionally, the permittee shall refer to 40 CFR 63.2281(h), Subpart DDDD for additional requirements pertaining to the electronic submittal of a semi-annual compliance report (including CBI).

(Ref.: 40 CFR 63.2271(b), 63.2281(a), (b)(1) – (4) and (6), (c) – (e), (h), and Table 9 (Item 1); Subpart DDDD)

- 5.C.4 For Emission Point AA-006, the permittee shall notify the MDEQ in writing at least thirty (30) days before changing a continuous monitoring parameter or the value / range of values for a continuous monitoring parameter.

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

- 5.C.5 For Emission Point AA-006, the permittee shall submit a written notification of intent to conduct a performance test required by Condition 5.B.7 at least sixty (60) days before the performance test is scheduled to begin. The notification shall detail the procedures and test methods to be implemented during the actual testing.

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

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

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

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

- 5.C.6 For Emission Point AA-006, the permittee shall submit the results of a performance test required by Condition 5.B.7 to the MDEQ no later than sixty (60) days after the date the performance test was completed.

Additionally, the permittee shall submit the test results to the EPA electronically in accordance with the procedures outlined in 40 CFR 63.2281(i)(1) – (3), Subpart DDDD.

(Ref.: 40 CFR 63.2281(a), (i), and Table 9 (Item 3); Subpart DDDD)

- 5.C.7 For Emission Points AA-009 through AA-011, AA-016, and AA-017, the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that details the following information:

- (a) Any occurrence when a required visible emission evaluation (VEE) was not conducted and an explanation as to why it was not performed; and
- (b) Any maintenance action(s) performed on an air pollution control device and any periods of time (including date and duration) in which a control device was non-operational.

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

- 5.C.8 For Emission Points AA-015 and AA-018, the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 that details the hours of operation for the engine. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.

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

- 5.C.9 For Emission Point AA-020, the permittee shall submit the results of the initial opacity test required by Condition 5.B.16 no later than sixty (60) days after completing the test in full. Thereafter, the permittee shall submit the results (and any supporting documentation – as applicable) of all subsequent testing no later than twelve (12) months after the previously submitted results.

(Ref.: 40 CFR 60.2260(d); Subpart CCCC)

- 5.C.10 For Emission Point AA-020, the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the hours of operation for the ACI on a rolling 12-month total basis.

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

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