

# STATE OF MISSISSIPPI AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

## THIS CERTIFIES THAT

Hood Industries Inc, Beaumont  
226 Delta Pine Road  
Beaumont, Mississippi  
Perry County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

*Becky Simonson*

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**AUTHORIZED SIGNATURE**  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued: March 12, 2025**

**Permit No.: 2200-00003**

## SECTION 1. GENERAL CONDITIONS

- 1.1 This permit is for air pollution control purposes only.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
- 1.1 Any activities not identified in the application are not authorized by this permit.  
(Ref.: Miss. Code Ann. 49-17-29(1)(b))
- 1.2 The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
- 1.3 It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
- 1.4 The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
- 1.5 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
- 1.6 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
- 1.7 The permit does not convey any property rights of any sort, or any exclusive privilege.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
- 1.8 The permittee shall furnish to the Department of Environmental Quality (DEQ) within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to

determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

- 1.9 *Design and Construction Requirements:* The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(1)-(3).)

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

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

- 1.11 *Fugitive Dust Emissions from Construction Activities:* The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

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

(a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.

(b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

1.13 *Right of Entry:* The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

- (a) To enter at reasonable times upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- (b) To have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air contaminants or waste waters, fuel, process material, or other material which affects or may affect emission of air contaminants from any source.

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

1.14 *Permit Modification or Revocation:* After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

- (a) Persistent violation of any of the terms or conditions of this permit;
- (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

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

1.15 *Public Record and Confidential Information:* Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

1.16 *Permit Transfer:* This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

- 1.18 *Permit Expiration:* The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance, if construction is suspended for eighteen (18) months or more, or if construction is not completed within a reasonable time. The DEQ may extend the 18-month period upon a satisfactory showing that an extension is justified.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1)., R. 2.5.C(4)., and R. 5.2.)
- 1.19 *Certification of Construction:* A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
- 1.20 *Beginning Operation:* After certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
- 1.21 *Application for a Permit to Operate:* The application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
- 1.22 *Operating Under a Permit to Construct:* Upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.
- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through

properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
  - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

- (3) Where an upset, as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., occurs during startup or shutdown, see the upset requirements above.

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

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

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

1.25 *Compliance Testing:* Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) detailed description of testing procedures;
  - (2) sample calculation(s);
  - (3) results; and
  - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

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

**SECTION 2. EMISSION POINT DESCRIPTION**

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

Emission Point	Description
AA-000	Facility-Wide (“Hood Industries Inc, Beaumont”)
AA-030	Wood-Fired Boiler [hybrid suspension grate burner; max. heat input: 140 MMBTU/hour; equipped with an electrostatic precipitator (ESP)]
AA-036	All Group 1 Miscellaneous Coating Operations: Logo Painting, Edge Sealing, Plyform Oil Application and Grade Stamping
AA-038	583 HP (400 kW) Diesel-Fired Compression Ignition (CI) Emergency Generator Engine [constructed in 2018] for Emission Point AA-030
AA-040	Westmill 6-Deck Softwood Veneer Dryer w/ RTO [natural gas-heated Zone 1 and steam-heated Zones 2 and 3]
AA-041	Westmill 4-Deck Softwood Veneer Dryer w/ RTO [natural gas-heated Zone 1 and steam-heated Zones 2 and 3]
AA-042	Taikei 120-Opening Horizontal Plywood Press
AA-043	Pneumatic Conveyance System
AA-044	220 HP (162kW) Diesel-Fired CI Emergency Fire Pump Engine [constructed in 2024]
AA-045	75 HP (48 kW) Natural Gas-Fired Spark Ignition (SI) Emergency Generator Engine for Lights [constructed in 2024]



**SECTION 3. EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Opacity (smoke)	40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2	Opacity	
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.3	PM (filterable)	$E = 4.1 p^{0.67}$
AA-030	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Fuel Restriction	Combust Only Bark, Wood Residue, and On-Site Generated Process Materials
	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10). <b>(PSD Avoidance Limits)</b>	3.5	Heat Input Rate	140.0 MMBTU/Hour (24-Hour Average)
		3.6	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	28.54 tpy (Rolling 12-Month Total)
		3.7	NO <sub>x</sub>	91.98 tpy (Rolling 12-Month Total)
		3.8	CO	219.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 1.4.A.(1).	3.9	SO <sub>2</sub>	4.8 lb./MMBTU
	40 CFR Part 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.40b(a); Subpart Db	3.10	PM (filterable)  NO <sub>x</sub>	General Applicability
	40 CFR 60.43b(c)(1), (f), and (g); Subpart Db	3.11	PM (filterable)	0.10 lb./MMBTU [or 43 ng. / J]
			Opacity	≤ 20% (6-Minute Average) Except for One 6-minute Period Per Hour of ≤ 27%

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-030	40 CFR Part 63, Subpart DDDDD – NESHAP for Industrial-Commercial-Institutional Boilers and Process Heaters 40 63.7485, 63.7490(a)(1), (d), and 63.7499(h); Subpart DDDDD	3.12	HAPs	General Applicability
	40 CFR 63.7500(a)(1), (f) and Table 2 (Items 1 and 13); Subpart DDDDD	3.13	PM (filterable) [or TSM]	0.44 [or 4.5E-4] lb/MMBTU of Heat Input
			CO [or CEMS]	3,500 ppmvd at 3% Oxygen (based on 3-run average); or [900 ppmvd at 3% Oxygen (based on rolling 30-day average)]
			HCl	0.022 lb/MMBTU of Heat Input (until October 6, 2025) 0.020 lb/MMBTU of Heat Input (after October 6, 2025)
			Hg	5.7E-6 lb/MMBTU of Heat Input (until October 6, 2025) 5.4E-06 lb/MMBTU of Heat Input (after October 6, 2025)
40 CFR 63.7500(a)(2), (f), 63.7525(a)(7) and Table 4 (Items 4.a and 7); Subpart DDDDD	3.14	Oxygen Concentration Opacity Boiler Load	Maintain Operating Limits	
AA-036 AA-040 AA-041 AA-042 AA-043	40 CFR Part 63, Subpart DDDD - NESHAP for Plywood and Composite Wood Products 40 CFR 63.2231, 63.2232(a), (b), (c), and 63.2290; Subpart DDDD	3.15	HAPs	General Applicability

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-038 AA-044 AA-045	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines  40 CFR 63.6585, 63.6665, 63.6590(a)(2)(ii) and (c)(6); Subpart ZZZZ	3.16	HAPs	General Applicability
AA-038 AA-044	40 CFR 60, Subpart III – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  40 CFR 60.4200(a)(2) and 60.4218; Subpart III	3.17	NMHC+NO <sub>x</sub>  CO  PM	General Applicability
AA-045	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  40 CFR 60.4230(a)(4)(iv) and 60.4246; Subpart JJJJ	3.18	NO <sub>x</sub>  CO	General Applicability
AA-038	40 CFR 60.4205(b), 60.4206, 60.4211(c); Subpart III	3.19	NMHC+NO <sub>x</sub>	Emission Standards
AA-044	40 CFR 60.4205(c), 60.4206, 60.4211(c), Table 4; Subpart III	3.20	CO  PM	Emission Standards
AA-038 AA-044	40 CFR 60.4207(b); Subpart III	3.21	Fuel Requirement	15 ppm Sulfur Content (Max.); and  40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by vol.)
AA-038 AA-044 AA-045	40 CFR 60.4211(f); Subpart III;  40 CFR 60.4243(d); Subpart JJJJ	3.22	Operational Requirement	100 Hours/Calendar Year for Maintenance and Readiness Testing;  50 Hours/Calendar Year for Non-Emergency Situations.
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.23	PM (filterable)	0.6 lb. / MMBTU
AA-045	40 CFR 60.4233(d), and 60.4234; Subpart JJJJ	3.24	NO <sub>x</sub>  CO	Emission Standards

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-040 AA-041	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10).  <b>(PSD Avoidance Limits)</b>	3.25	Veneer Production	290,000 MSF/Year (3/8") (Rolling 12-Month Total)
		3.26	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	7.18 tpy (Combined Total; Rolling 12-Month Total)
		3.27	NO <sub>x</sub>	19.54 tpy (Combined Total; Rolling 12-Month Total)
		3.28	CO	55.25 tpy (Combined Total; Rolling 12-Month Total)
		3.29	VOCs	30.96 tpy (Combined Total; Rolling 12-Month Total)
	40 CFR 63.2240(b) and Table 1B; Subpart DDDD	3.30	HAPs	90% Reduction Efficiency [measured as THC (as carbon)]
	40 CFR 63.2240(b) and Table 2 (Item 1); Subpart DDDD	3.31		Maintain 3-Hour Block Average Firebox Temperature
	63.2233(a)(2), 63.2250 (f) and (g); Subpart DDDD	3.32		General Requirements
	AA-042	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10).  <b>(PSD Avoidance Limit)</b>	3.33	Plywood Production
AA-043	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10).  <b>(PSD Avoidance Limits)</b>	3.34	PM <sub>10</sub> (filterable)	2.32 tpy (Rolling 12-Month Total)
		3.35	PM <sub>2.5</sub> (filterable)	1.71 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10).	3.36	PM <sub>10</sub> /PM <sub>2.5</sub> (filterable)	Operate the Pollution Control Device at All Times the Process Equipment is in Operation

3.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty percent (40%) opacity subject to the following exceptions:

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

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

3.2 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant or emissions of such opacity as to obscure an observer's view to a degree in excess of forty 40% opacity, equivalent to that provided in Condition 3.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

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

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

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

3.4 For Emission Points AA-030, the permittee is authorized to combust bark, wood residuals (resinated and unresinated), and on-site generated process materials (e.g., paper products and ESP waste) as fuel within the boiler.

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

3.5 For Emission Points AA-030, the permittee shall limit the total heat input rate of the boiler to no more than 140.0 million BTU (MMBTU) per hour based on a 24-hour average.

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

- 3.6 For Emission Points AA-030, the permittee shall limit the emission of particulate matter less than 10 microns in diameter (PM<sub>10</sub>; filterable and condensable) and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>; filterable and condensable) to no more than 28.54 tons per year (tpy) based on a rolling 12-month total.

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

- 3.7 For Emission Points AA-030, the permittee shall limit the emission of nitrogen oxides (NO<sub>x</sub>) to no more than 91.98 tpy based on a rolling 12-month total.

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

- 3.8 For Emission Points AA-030, the permittee shall limit the emission of carbon monoxide (CO) to no more than 219.0 tpy based on a rolling 12-month total.

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

- 3.9 For Emission Point AA-030, the permittee shall limit the maximum discharge of sulfur oxides to more than 4.8 pounds (measured as sulfur dioxide or SO<sub>2</sub>) per MMBTU heat input.

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

- 3.10 For Emission Point AA-030, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units and 40 CFR Part 60, Subpart A – General Provisions.

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

- 3.11 For Emission Point AA-030, the permittee shall comply with the following limitations at all times except during periods of start-up, shutdown, or malfunction:

- (a) Particulate matter (PM): no more than 0.10 lb. / MMBTU [or 43 nanograms per joule (ng. / J)] of heat input; and
- (b) Opacity: no more than 20% (based on a 6-minute average) except for one (1) 6-minute period per hour of no more than 27%.

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

- 3.12 For Emission Point AA-030, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial-Commercial-Institutional Boilers and Process Heaters and 40 CFR Part 63, Subpart A – General Provisions (as identified in Table 10 of Subpart DDDDD).

For purpose of this permit, Emission Point AA-030 is considered an existing boiler in the “hybrid suspension / grate units designed to burn biomass / bio-based solid” subcategory.

(Ref.: 40 CFR 63.7485, 63.7490(a)(1), (d), and 63.7499(h); Subpart DDDDD)

3.13 For Emission Point AA-030 except during periods of start-up and shutdown, the permittee shall at all times comply with the following emission standards:

- (a) Filterable PM: no more than 0.44 pounds per MMBTU of heat input [or for Total Selected Metals (TSM): no more than  $4.5 \times 10^{-4}$  pounds per MMBTU of heat input].
- (b) Carbon Monoxide (CO): no more than 3,500 parts per million by volume on a dry basis (ppmvd) corrected to 3% oxygen (based on a 3-run average) or 900 ppmvd on a dry basis corrected to 3% oxygen (based on a rolling 30-day average).
- (c) Hydrogen Chloride (HCl): no more than 0.022 pounds per MMBTU of heat input (until October 6, 2025); no more than 0.020 pounds per MMBTU of heat input (after October 6, 2025).
- (d) Mercury (Hg): no more than  $5.7 \times 10^{-6}$  pounds per MMBTU of heat input (until October 6, 2025); no more than  $5.4 \times 10^{-6}$  pounds per MMBTU of heat input (after October 6, 2025).

(Ref.: 40 CFR 63.7500(a)(1), (f), and Table 2 (Items 1 and 13); Subpart DDDDD)

3.14 For Emission Point AA-030, the permittee shall at all times (except during periods of start-up and shutdown) comply with the following operating limits:

- (a) Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the performance test that demonstrates compliance with the CO emission limit specified in Condition 3.13;
- (b) Maintain the opacity to less than or equal to either 10% or the highest hourly average opacity reading measured during the performance test that demonstrates compliance with the PM or Hg emission limit specified in Condition 3.13 (based on a daily block average); and
- (c) Maintain the rolling 30-day average boiler operating load such that it does not exceed 110% of the highest hour average operating load recorded during a performance test conducted to demonstrate compliance with an emission limit specified in Condition 3.13.

(Ref.: 40 CFR 63.7500(a)(2) and (f), 63.7525(a)(7), and Table 4 (Items 4.a and 7); Subpart DDDDD)

- 3.15 For Emission Points AA-036, AA-040, AA-041, AA-042, AA-043, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products and the applicable requirements found in 40 CFR Part 63, Subpart A – General Provisions (as required in Table 10 of Subpart DDDD).

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

- 3.16 For Emission Points AA-038, AA-044 and AA-045, 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). The permittee shall comply with Subpart ZZZZ by complying with the applicable requirements found in 40 CFR Part 60, Subpart IIII and Subpart JJJJ. No further requirements apply for these engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585, 63.6665, 63.6590(a)(2)(ii) and (c)(6); Subpart ZZZZ)

- 3.17 For Emission Points AA-038 and AA-044, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions, as specified in Table 8 to Subpart IIII.

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

- 3.18 For Emission Point AA-045, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and the applicable requirements of 40 CFR Part 60, Subpart A – General Provisions, as specified in Table 3 to Subpart JJJJ

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

- 3.19 For Emission Point AA-038, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO<sub>x</sub>): 4.0 grams per kilowatt-hour;
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour;
- (c) Particulate Matter (PM): 0.20 grams per kilowatt-hour; and
- (d) Smoke standards as specified in 40 CFR 1039.105.

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(b), 60.4206, 60.4211(c); Subpart IIII)

3.20 For Emission Point AA-044, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO<sub>x</sub>): 3.0 grams per horsepower-hour;
- (b) Carbon Monoxide (CO): 2.6 grams per horsepower-hour; and
- (c) Particulate Matter (PM): 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)

3.21 For Emission Points AA-038, and AA-044, 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)

3.22 For Emission Points AA-038, AA-044 and AA-045, 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. Except as specified in 40 CFR 60.4211(f)(3)(i) and 60.4243(d)(3)(i), 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 60.4211(f); Subpart IIII)

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

- 3.23 For Emission Points AA-038, AA-044 and AA-045, the maximum permissible emission of particulate matter (PM) from an installation of less than ten (10) million BTU (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).)

- 3.24 For Emission Point AA-045, the permittee shall comply with the following emission standards:

- (a) Nitrogen Oxides (NO<sub>x</sub>): 10 grams per horsepower-hour; and
- (b) Carbon Monoxide (CO): 387 grams per horsepower-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 60.4233(d), and 60.4234; Subpart JJJJ)

- 3.25 For Emission Points AA-040 and AA-041, the permittee shall limit the total veneer production from both dryers to no more than 290,000.0 thousand square feet (MSF) (3/8 in thickness) per year based on a rolling 12-month total.

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

- 3.26 For Emission Points AA-040 and AA-041, the permittee shall limit the emission of PM<sub>10</sub> (filterable and condensable) and PM<sub>2.5</sub> (filterable and condensable) to no more than 7.18 tpy from both dryers combined based on a rolling 12-month total.

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

- 3.27 For Emission Points AA-040 and AA-041, the permittee shall limit the emission of NO<sub>x</sub> to no more than 19.54 tpy from both dryers combined based on a rolling 12-month total.  
  
(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10). – PSD Avoidance Limit)
- 3.28 For Emission Points AA-040 and AA-041, the permittee shall limit the emission of CO to no more than 55.25 tpy from both dryers combined based on a rolling 12-month total.  
  
(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10). – PSD Avoidance Limit)
- 3.29 For Emission Points AA-040 and AA-041, the permittee shall limit the emission of volatile organic compounds (VOCs) to no more than 30.96 tpy from both dryers combined based on a rolling 12-month total.  
  
(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10). – PSD Avoidance Limit)
- 3.30 For Emission Points AA-040 and AA-041, the permittee shall operate each regenerative thermal oxidizer (RTO) in such a manner as to reduce the emission of hazardous air pollutants (HAPs) in total by 90% [measured as total hydrocarbons (THC) – as carbon].  
  
(Ref.: 40 CFR 63.2240(b) and Table 1B; Subpart DDDD)
- 3.31 For Emission Points AA-040 and AA-041, the permittee shall maintain the 3-hour block average firebox temperature of each RTO above the minimum temperature established during the most recent performance test that demonstrates compliance with the HAP [measured as THC – as carbon] destruction efficiency standard specified in Condition 3.30.  
  
(Ref.: 40 CFR 63.2240(b) and Table 2 (Item 1); Subpart DDDD)
- 3.32 For Emission Points AA-040 and AA-041, the permittee shall comply with the compliance options, operating requirements, and the work practice requirements found in Subpart DDDD when the veneer dryers are operating, except: (1) prior to initial startup; (2) safety-related shutdowns conducted in accordance with Condition 4.7, and (3) startup / shutdown of the gas-fired burners conducted in accordance with Conditions 4.7. However, the permittee shall minimize the length of time when compliance options and operating requirements are not met due to safety-related shutdowns and startup / shutdown of the gas-fired burners.

Additionally, the permittee must always operate and maintain the veneer dryers (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 63.2233(a)(2), 63.2250(f) and (g); Subpart DDDD)

- 3.33 For Emission Point AA-042, the permittee shall limit the total plywood production to no more than 290,000.0 thousand square feet (MSF) (3/8 in thickness) per year based on a rolling 12-month total.

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

- 3.34 For Emission Point AA-043, the permittee shall limit the emission of PM<sub>10</sub> (filterable) to no more than 2.32 tpy based on a rolling 12-month total.

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

- 3.35 For Emission Point AA-043, the permittee shall limit the emission of PM<sub>2.5</sub> (filterable) to no more than 1.71 tpy based on a rolling 12-month total.

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

- 3.36 For Emission Point AA-043, the permittee shall operate the pollution control device (i.e. wet extraction tower) associated with the process equipment (i.e. pneumatic conveyance system) at all times during active operation. The permittee shall operate the control device in accordance with the manufacturer's design, specification requirements and recommendations. In the event the control device malfunctions or becomes non-operational, the permittee shall take actions as expeditiously as possible to bring the device back to normal operation or cease the operation of the associated process equipment.

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

**SECTION 4. WORK PRACTICES**

Emission Point	Applicable Requirement	Condition Number(s)	Work Practice
AA-030	40 CFR 63.7500(a)(3); Subpart DDDDD	4.1	General Duty Clause
	40 CFR 63.7500(a)(1), 63.7515(d), 63.7540(a)(12), (13), and Table 3; Subpart DDDDD	4.2	Conduct Routine Tune-Ups
	40 CFR 40 CFR 63.7525(a)(7); Subpart DDDDD	4.3	Set the Oxygen Concentration Level on the Oxygen Trim System
	40 CFR 63.7500(f), 63.7540(d), Table 3 (Items 5 and 6); Subpart DDDDD	4.4	Follow Start-Up and Shutdown Requirements
AA-036	40 CFR 63.2241(a) and Table 3 (Item 5); Subpart DDDD	4.5	Use Non-HAP Coatings
AA-038 AA-044	40 CFR 60.4211(a); Subpart IIII	4.6	Conduct Best Management Practices
AA-040 AA-041	40 CFR 63.2241(a) and Table 3 (Items 3, 6, and 8); Subpart DDDD	4.7	Minimize Fugitive Emissions; Follow Safety-Related Shutdown Procedures; Gas-Fired Burners Start-Up / Shutdown Requirements

4.1 For Emission Point AA-030, the permittee shall at all times operate and maintain the boiler in a manner consistent with safety and good air pollution control practices for minimizing emissions. 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 boiler.

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

4.2 For Emission Point AA-030, the permittee shall conduct a tune-up of the boiler once every five (5) years and no more than sixty-one (61) months after the previous tune-up. Each tune-up shall be performed in accordance with the following specifications:

- (a) Inspect the burner (as applicable) and clean or replace any components of the burner as necessary. The permittee may delay the burner inspection specified until the next scheduled or unscheduled unit shutdown. If the boiler produces electricity for sale, the permittee may delay the burner inspection until the first outage not to exceed seventy-two (72) months from the previous inspection.

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. If the boiler produces electricity for sale, the permittee may delay the burner inspection until the first outage not to exceed thirty-six (36) months from the previous inspection.
- (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<sub>x</sub>) 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.

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 63.7500(a)(1), 63.7515(d), 63.7540(a)(12), (13), and Table 3; Subpart DDDDD)

- 4.3 For Emission Point AA-030, the permittee shall set the oxygen level on the oxygen trim system no lower than the lowest hourly average oxygen concentration measured during the most recent performance test that demonstrates compliance with the CO emission limitation specified in Condition 3.13(c).

(Ref.: 40 CFR 63.7525(a)(7); Subpart DDDDD)

4.4 For Emission Point AA-030, the permittee shall operate the boiler in accordance with the following requirements during periods of start-up and shutdown (as applicable):

(a) For Periods of Start-Up:

- (1) The permittee shall operate all continuous monitoring systems during start-up.
- (2) The permittee must use one (1) or a combination of the following clean fuels (as defined by Subpart DDDDD where applicable): natural gas; synthetic natural gas; propane; other Gas 1 fuels; distillate oil; syngas; ultra-low sulfur diesel; fuel oil-soaked rags; kerosene; hydrogen; paper; cardboard; refinery gas; liquefied petroleum gas; clean dry biomass; and any fuels meeting the appropriate HCl, mercury, and TSM emission standards by fuel analysis.
- (3) The permittee may use either of the following work practice standards:
  - (i) Once a boiler starts firing a fuel that is not a clean fuel (i.e. non-clean and/or wet biomass), the permittee shall vent emissions to the appropriate main stack and engage all of the applicable control devices. Start-up ends when steam or heat is supplied for any purpose; or
  - (ii) Once a boiler starts firing a fuel that is not a clean fuel, the permittee shall vent emissions to the appropriate main stack and engage all of the applicable control devices so as to comply with the emission limits within four (4) hours of start of supplying useful thermal energy. The permittee must engage and operate PM control within one (1) hour of first feeding fuels that are not clean fuels. The permittee must start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the boiler other than Subpart DDDDD that require operation of the control devices. The permittee must develop and implement a written startup and shutdown plan, as specified in 40 CFR 63.7505(e).

(b) For Periods of Shutdown:

- (1) The permittee shall operate all continuous monitoring systems during shutdown.
- (2) When firing fuels that are not clean fuels during a shutdown, the permittee shall vent emissions to the appropriate main stack and operate all applicable control devices.
- (3) If another fuel must be used to support the shutdown process (in addition to the fuel used prior to initiation of shutdown), the additional fuel must be one or a combination of the following clean fuels (as defined by Subpart DDDDD where applicable): natural gas; synthetic natural gas; propane;

other Gas 1 fuels; distillate oil; syngas; ultra-low sulfur diesel; refinery gas; and liquefied petroleum gas.

(Ref.: 40 CFR 63.7500(f), 63.7540(d), and Table 3 (Items 5 and 6); Subpart DDDDD)

- 4.5 For Emission Point AA-036, the permittee shall use non-HAP coatings, as defined in 40 CFR 63.2292.

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

- 4.6 For Emission Points AA-038 and AA-044, the permittee shall adhere to the following work practices:

- (a) Operate and maintain the 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)

- 4.7 For Emission Points AA-040 and AA-041, the permittee shall meet the following work practice requirements:

- (a) 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).
- (b) The permittee shall follow documented site-specific safety-related shutdown procedures, such as 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.
- (c) During periods of start-up and shutdown of the gas-fired burners, the permittee shall cease feeding green veneer into the dryer and minimize the amount of time the dryer is vented to the atmosphere.

Shutoff of direct-fired burners resulting from partial and full production stoppages of the veneer dryers or over-temperature events shall be deemed shutdowns and not malfunctions. Lighting or re-lighting any one or all gas burners in the dryers shall be deemed startups and not malfunctions.

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



**SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS**

<b>Emission Point</b>	<b>Applicable Requirement</b>	<b>Condition Number(s)</b>	<b>Pollutant/Parameter</b>	<b>Monitoring/Recordkeeping Requirement</b>
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain Records for a Minimum of Five (5) Years
	40 CFR 52.21(r)(6)(iii); Subpart A	5.2	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Calculate and Maintain Project-Related Emissions Increases
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	NO <sub>x</sub> CO VOCs	General Performance Testing Requirements
AA-030	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Total Heat Input	Determine the Average Heat Input (24-Hour Average)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable) NO <sub>x</sub> CO	Conduct Performance Testing
	40 CFR 60.46b(b) and (d); Subpart Db 11 Miss. Admin Code Pt. 2, R. 2.2.B(11).	5.6	PM Opacity	Conduct Performance Testing
	40 CFR 60.49b(d)(2); Subpart Db	5.7	Fuel Usage	Monitor Fuel Usage Monthly
	40 CFR 63.7555(a) – (c), (d)(1), (3), (4), (6) – (13) and 63.7560; Subpart DDDDD	5.8	HAPs	Recordkeeping Requirements
	40 CFR 63.7505(d), and 63.7520(a); Subpart DDDDD	5.9	HCl Hg CO	Develop and Maintain Site-Specific Monitoring Plan for COMS and Stack Testing Plan
	40 CFR 63.7505(c), 63.7515(a) – (c), 63.7520(b) – (e), 63.7530(a); Subpart DDDDD	5.10	PM (filterable)	Conduct Performance Testing
	40 CFR 63.7505(c), 63.7510(f), 63.7515(e); Subpart DDDDD	5.11	HCl Hg TSM	Fuel Analysis

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-030	40 CFR 63.7525(a) 63.7575 and Table 7 (Items 4 and 5); Subpart DDDDD	5.12	Oxygen Concentration Boiler Load	Establish Operating Limits
	40 CFR 63.7525(c), 63.7540(a), and Table 8; Subpart DDDDD	5.13	Opacity	Continuous Compliance Requirements
	40 CFR 63.7525(d) and 63.7535; Subpart DDDDD	5.14	Oxygen Concentration Boiler Load	Continuous Compliance Requirements CMS Operational Requirements
AA-030 AA-040 AA-041 AA-043	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.15	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Calculate the Emission of Each Pollutant (As Applicable) (Monthly and Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.16	NO <sub>x</sub> CO VOCs	Perform Monthly Maintenance Inspections on Each Control Device Maintain Documentation on Periods of Non-Operation of a Control Devices
AA-038 AA-044 AA-045	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. 2.2.B(11).	5.17	NMHC+NO <sub>x</sub> CO PM	Recordkeeping Requirements
	40 CFR 60.4214(b); Subpart IIII 40 CFR 60.4245(b); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.18	Emergency Engine Status	Record Hours of Operation (Emergency and Non-Emergency)
AA-040 AA-041	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.19	Veneer Production	Monitor Total Veneer Production (Monthly and Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.20	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable) NO <sub>x</sub> CO VOCs	Conduct Performance Testing Establish RTO Operating Parameters

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
	40 CFR 63.2260(a), 63.2261(a) and Table 7 (Item 7); Subpart DDDD	5.21	HAP Firebox Temperature	Conduct Performance Testing Determine the Minimum Firebox Temperature for Each RTO
	40 CFR 63.2269(a) and (b); Subpart DDDD	5.22	Firebox Temperature	Install a CPMS for Temperature Monitoring in Each RTO
AA-040 AA-041	40 CFR 63.2270(a)–(d), (f), 63.2271(a), and Table 7 (Item 1); Subpart DDDD	5.23	Firebox Temperature	Continuous Compliance Requirements
	40 CFR 63.2271(a), 63.2282(a), (b), (f), and Table 8 (Items 3, 5, 6, and 8); Subpart DDDD	5.24	HAP	Recordkeeping Requirements
AA-042	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.25	Plywood Production	Monitor Total Plywood Production (Monthly and Rolling 12-Month Total)
AA-043	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.26	PM <sub>10</sub> / PM <sub>2.5</sub> (filterable + condensable)	Conduct Performance Testing Establish the Control Device Operating Parameters

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

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

5.2 For Emission Point AA-000 (Facility-Wide), the permittee shall monitor the respective emission increase of PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, CO, and VOCs as a result of the construction project.

The permittee shall calculate and record the respective pollutant emissions in tons per year (tpy) on a 12-month calendar year basis from all sources affected by the proposed construction project for a duration of five (5) years following the resumption of regular operations after the change in accordance with 40 CFR 52.21(r)(6)(i)(c); Subpart A.

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

5.3 For Emission Point AA-000 (Facility-Wide), unless otherwise specified herein, the permittee shall conduct performance testing in accordance with the following requirements:

- (a) All performance testing shall be conducted in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (c) The permittee shall conduct performance testing of NO<sub>x</sub> and CO concurrently.
- (d) As applicable, the permittee shall conduct a performance stack test at representative operating conditions. Operations during periods of start-up, shutdown, or nonoperation do not constitute “representative operating conditions”. The permittee may not conduct performance tests during periods of malfunction. The permittee shall monitor and record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation.
- (e) The MDEQ may require the permittee to conduct a subsequent performance stack test if the heat input rate of a unit increases by more than ten percent (10%) of the average rate established during the completed test;
- (f) As applicable, the permittee shall monitor and record the usage of each fuel combusted during each test run.

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

- 5.4 For Emission Point AA-030, the permittee shall demonstrate compliance with the limitation specified in Condition 3.5 by monitoring the daily steam generation rate of the boiler and calculating the average heat input of the boiler based on a 24-hour average.

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

- 5.5 For Emission Point AA-030, the permittee shall evaluate the emission of PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, and CO by conducting performance testing no later than one hundred eighty (180) days after initial startup. The permittee shall conduct subsequent performance testing at least once every five (5) years [no later than sixty-one (61) months following the previously completed performance test].

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

- 5.6 For Emission Point AA-030, to determine compliance with the PM and opacity limitations in Condition 3.11, the permittee shall conduct an initial performance test as required under 40 CFR 60.8, Subpart A, using the procedures and reference methods in 40 CFR 60.46b(d) Subpart Db. The performance test shall be conducted within sixty (60) days after achieving the maximum production rate at which the boiler will be operated, but not later than one hundred eighty (180) days after initial startup. Thereafter,

subsequent testing shall be conducted at the same frequency as the PM testing required by Condition 5.10.

(Ref.: 40 CFR 60.46b(b) and (d); Subpart Db)

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

- 5.7 For Emission point AA-030, the permittee shall monitor and record the amount of each fuel combusted during each calendar month.

(Ref.: 40 CFR 60.49b(d)(2); Subpart Db)

- 5.8 For Emission Point AA-030, the permittee must maintain documentation on the following information (as applicable):

- (a) A copy of each notification and report submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or a submitted semi-annual compliance report;
- (b) All performance tests, fuel analyses, other specified compliance demonstrations, and performance evaluations;
- (c) For each continuous opacity monitoring system (COMS) and/or continuous monitoring system (CMS), the permittee shall maintain the following information:
  - (1) Records described in 40 CFR 63.10(b)(2)(vii) – (xi), Subpart A;
  - (2) Monitoring data for the COMS during a performance evaluation as required in 40 CFR 63.6(h)(7)(i) – (ii), Subpart A;
  - (3) Previous versions of the performance evaluation plan as required by 40 CFR 63.8(d)(3), Subpart A; and
  - (4) Records on the date and time each deviation started and stopped.
- (d) All records required by Table 8 of Subpart DDDDD, including documentation on all monitoring data and calculated averages for applicable operating levels (such as opacity and boiler operating load) to demonstrate continuous compliance with each applicable emission and/or operating limit;
- (e) The quantity of each fuel type combusted in the boiler on a monthly basis;
- (f) A copy of all calculations and supporting documentation of maximum chlorine fuel input, using Equation 7 of 40 CFR 63.7530, if compliance is demonstrated through performance testing. If compliance is demonstrated through fuel analysis, a copy of all calculations and supporting documentation of HCl emission rates, using Equation 16 of 40 CFR 63.7530. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum chlorine fuel input or HCl emission rates.
- (g) A copy of all calculations and supporting documentation of maximum mercury fuel input, using Equation 8 of 40 CFR 63.7530, if compliance is demonstrated through performance testing. If compliance is demonstrated through fuel analysis,

a copy of all calculations and supporting documentation of mercury emission rates, using Equation 17 of 40 CFR 63.7530. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum mercury fuel input or mercury emission rates.

- (h) Records on the occurrence and duration of each malfunction of either the boiler or the associated air pollution control and monitoring equipment;
- (i) Records on the actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions (including corrective actions to restore the malfunctioning boiler, air pollution control or monitoring equipment to its normal use or usual manner of operation);
- (j) A copy of all calculations and supporting documentation of maximum TSM fuel input, using Equation 9 of 40 CFR 63.7530, if compliance is demonstrated through performance testing. If compliance is demonstrated through fuel analysis, a copy of all calculations and supporting documentation of TSM emission rates, using Equation 18 of 40 CFR 63.7530. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum TSM fuel input or TSM emission rates.
- (k) Records on the calendar date, time, occurrence, and duration of each start-up and shutdown;
- (l) Records on the type(s) and amount(s) of fuel used during each start-up and shutdown.
- (m) For each startup period, for boilers selecting to comply with Condition 4.4(a)(3)(ii), the permittee must maintain records of the time that clean fuel combustion begins; the start time when feeding not clean fuels; the time when useful thermal energy is first supplied; and the time when the PM controls are engaged.
- (n) If complying with Condition 4.4(a)(3)(ii), for each startup period, maintain records of the hourly steam temperature, hourly steam pressure, hourly steam flow, hourly flue gas temperature, and all hourly average CMS data (e.g. PM CPMS, COMS, ESP total secondary electric power input) collected during each startup period to confirm that the control devices are engaged. In addition, if compliance with the PM emission limit is demonstrated using a PM control device, maintain the records specified in 40 CFR 63.7555(d)(12), Subpart DDDDD.
- (o) If complying with Condition 4.4(a)(3)(ii), and PM control(s) cannot be safely engaged and operated within 1 hour of first firing non-clean fuels, the permittee may choose to comply with Condition 4.4(a)(3)(i) or submit to the MDEQ a request for a variance with the PM controls requirement, as described in 40 CFR 63.7555(d)(13), Subpart DDDDD.

(Ref.: 40 CFR 63.7555(a) – (c), (d)(1), (3) (4), (6) – (13), and 63.7560; Subpart DDDDD)

- 5.9 For Emission Point AA-030, the permittee shall develop and maintain a site-specific monitoring plan in accordance with 40 CFR 63.7505(d)(1) – (4), Subpart DDDDD for the use of a continuous opacity monitoring system (COMS) or a continuous monitoring system (CMS).

The permittee shall also develop and maintain a site-specific stack test plan that includes a test program summary, a test schedule, data quality objectives, and both an internal and external quality assurance program. The data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.

(Ref.: 40 CFR 63.7505(d), and 63.7520(a); Subpart DDDDD)

- 5.10 For Emission Point AA-030, the permittee shall demonstrate compliance with the emission limits specified in Condition 3.13 by conducting performance testing within one hundred eighty (180) days after initial startup in accordance with the following specifications:

- (a) All performance testing shall be performed in accordance with the requirements specified in 40 CFR 63.7520 and Table 5, Subpart DDDDD and at representative load conditions.

During each performance test, the permittee shall establish the operating limit(s) for each pollutant in accordance with Condition 3.14 and conduct CMS performance evaluations in accordance with 40 CFR 63.7525, Subpart DDDDD.

- (b) Unless otherwise allowed herein in paragraph (c) of this condition, the permittee shall conduct each performance test annually and no later than thirteen (13) months after the previously completed test.

- (c) If the performance test results for a specific pollutant are at or below 75% of the corresponding emission limitation for at least two consecutive years and there have been no changes to the operation of the boiler or air pollution control equipment that could increase emissions, the permittee may choose to conduct subsequent performance tests for the pollutant once every three (3) years and no later than thirty-seven (37) months after the previously completed test.

If a performance test results for a specific pollutant indicates that the emissions are in excess of 75% of the corresponding emission limitation, the permittee must resume annual testing in accordance with paragraph (b) of this condition until such time the performance tests over a two-year period fall below 75% of the emission limitation.

(Ref.: 40 CFR 63.7505(c), 63.7515(a) – (c), 63.7520(b) – (e), 63.7530(a); Subpart DDDDD)

- 5.11 For Emission Point AA-030, if demonstrating compliance with the mercury, HCl, or TSM based on fuel analysis, the permittee must conduct a fuel analysis according to 40 CFR 63.7521 for each type of fuel burned within one hundred eighty (180) days after startup and monthly thereafter. The fuel analysis may be completed any time within the calendar month as long as the analysis is separated from the previous analysis by at least fourteen (14) calendar days. If a new type of fuel is burned, a fuel analysis must be conducted before burning the new type of fuel.

If each of twelve (12) consecutive monthly fuel analyses demonstrates 75% or less of the compliance level, the permittee may decrease the fuel analysis frequency to quarterly for that fuel. If any quarterly sample exceeds 75% of the compliance level or a new type of fuel is burned, the permittee must return to monthly monitoring for that fuel, until 12 months of fuel analyses are again less than 75% of the compliance level. If sampling is conducted on one (1) day per month, samples should be no less than 14 days apart, but if multiple samples are taken per month, the 14-day restriction does not apply.

(Ref.: 40 CFR 63.7505(c), 63.7510(f), 63.7515(e); Subpart DDDDD)

5.12 For Emission Point AA-030, the permittee shall establish values for the operating limits specified in Condition 3.14 by monitoring and recording the applicable data in accordance with the following specifications:

- (a) The minimum oxygen concentration shall be confirmed or reestablished during each performance test performed to demonstrate compliance with the applicable CO emission limitation by collecting oxygen data every fifteen (15) minutes during the entire period of a performance test.
- (b) The maximum boiler operating load shall be confirmed or reestablished during each performance test performed to demonstrate compliance with an emission limitation specified in Condition 3.13 by collecting either operating load data or steam generation data every fifteen (15) minutes during the entire period of a performance test.
- (c) The permittee shall determine the hourly average oxygen concentration and/or the hourly average operating load by computing the hourly averages using all of the 15-minute readings taken during each performance test to determine either the minimum oxygen concentration or the maximum boiler operating load (which shall be the hourly average operating load multiplied by 1.1).
- (d) For the oxygen analyzer system, the permittee shall operate, maintain and calibrate this CMS in accordance with the manufacturer's recommendations.

(Ref.: 40 CFR 63.7525(a), 63.7575 and Table 7 (Items 4 and 5); Subpart DDDDD)

5.13 For Emission Point AA-030, the permittee shall demonstrate continuous compliance with the operating limit specified in Condition 3.14 by operating, certifying, and maintaining a continuous opacity monitoring system (COMS) in accordance with the site-specific monitoring plan outlined in Condition 5.9 and the following specifications:

- (a) The permittee shall conduct a performance evaluation of the COMS in accordance with the requirements in 40 CFR 63.8(e), Subpart A and the Performance Specification 1 (found in Appendix B of 40 CFR Part 60).
- (b) The COMS must complete a minimum of one (1) cycle of sampling and analyzing for each successive 10-second period and one (1) cycle of data recording for each successive 6-minute period.



- (c) The COMS data must be reduced to 6-minute averages.
- (d) The site-specific monitoring plan (as required by Condition 5.9) must contain procedures and acceptance criteria for operating and maintaining each COMS in accordance with to the requirements of 40 CFR 63.8(d), Subpart A. At a minimum, the monitoring plan must include a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit of the COMS.
- (e) The permittee shall operate and maintain the COMS in accordance with the requirements in the monitoring plan and the requirements of 40 CFR 63.8(e), Subpart A. The permittee shall identify periods the COMS is out-of-control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or annual zero alignment audit. Any 6-minute period for which the monitoring system is out-of-control and data is not available for a required calculation constitutes a deviation from the monitoring requirements.
- (f) The permittee shall determine and record all 6-minute averages [and daily block averages (as applicable)] collected for periods during which the COMS is not out of control.

(Ref.: 40 CFR 63.7525(c), 63.7540(a), and Table 8; Subpart DDDDD)

5.14 For Emission Point AA-030, the permittee shall demonstrate continuous compliance with the operating limits specified in Condition 3.14 by operating and maintaining each CMS so that data is collected in accordance with the site-specific monitoring plan required in Condition 5.9 and the following specifications:

- (a) The CMS must complete a minimum of one (1) cycle of operation every fifteen (15) minutes and have a minimum of four (4) successive cycles of operation to have a valid hour of data. Any 15-minute period for which a CMS is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements.
- (b) For the CMS associated with the boiler operating load, the permittee shall determine the 30-day rolling average from all recording readings, except as specified in paragraph (e) in this condition.
- (c) The permittee shall record and maintain the results of each inspection, calibration, and/or validation check performed on a CMS.
- (d) The permittee shall operate monitoring systems and collect data at all required intervals at all times that the boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out-of-control periods, and required monitoring system quality assurance or control activities, including (as applicable) calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the site-specific monitoring plan.

A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring

system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The permittee is required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.

- (e) The permittee may not use data recorded during periods of start-up and shutdown, monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or control activities in data averages and calculations used to report emissions or operating levels.

The permittee shall record and make available upon request the results of CMS performance audits and the date / duration of periods when the CMS is out-of-control to completion of the corrective actions necessary to return the CMS to operation consistent with the site-specific monitoring plan. The permittee must use all data collected during all other periods in assessing compliance and the operation of the control device and associated control system.

- (f) Except during periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities, failure to collect required data is a deviation of the monitoring requirements.

In calculating monitoring results, do not use any data collected during periods of startup and shutdown, when the monitoring system is out-of-control as specified in the site-specific monitoring plan, while conducting repairs associated with periods when the monitoring system is out-of-control, or while conducting required monitoring system quality assurance or quality control activities. The permittee must calculate monitoring results using all other monitoring data collected while the boiler is operating.

(Ref.: 40 CFR 63.7525(d) and 63.7535; Subpart DDDDD)

- 5.15 For Emission Points AA-030, AA-040, AA-041, and AA-043, the permittee shall demonstrate compliance with the emission limitations in Conditions 3.6, 3.7, 3.8, 3.26, 3.27, 3.28, 3.29, 3.34, and 3.35, by calculating and recording the emission of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, and VOCs from each source (as applicable) in tons both on a monthly basis and rolling 12-month total basis.

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

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

- 5.16 For Emission Points AA-030, AA-040, AA-041, and AA-043, the permittee shall perform an inspection that evaluates the performance capability of each control device on a monthly basis.

If a problem is noted during an inspection of a control device, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the

permittee shall maintain on-site (to the best extent practicable) sufficient components as is necessary to repair a control device.

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

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

5.17 For Emission Points AA-038, AA-044 and AA-045, 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; and
- (c) Documentation from the manufacturer that indicates an engine is certified to meet the respective emission standards specified in Conditions 3.19, 3.20, and 3.24.

(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. 2.2.B(11).)

5.18 For Emission Points AA-038, AA-044 and AA-045, 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)

(Ref.: 40 CFR 60.4245(b); Subpart JJJJ)

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

5.19 For Emission Points AA-040 and AA-041, the permittee shall monitor and record the total veneer production in MSF (3/8”) both on a monthly basis and a rolling 12-month total basis.

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

5.20 For Emission Points AA-040 and AA-041, the permittee shall evaluate the emission of PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, CO, and VOCs by conducting performance testing no later than one hundred eighty (180) days after initial startup. The permittee shall conduct subsequent performance testing once every five (5) years [no later than sixty-one (61) months following the previous completed performance test].

The permittee shall establish a minimum firebox temperature (in degrees Fahrenheit) for each RTO during each VOC-related performance test in accordance with Condition 5.21(g).

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

5.21 For Emission Point AA-040 and AA-041, the permittee shall conduct an initial performance test to demonstrate compliance with the HAP destruction efficiency standard specified in Condition 3.30 and establish the site-specific operating requirement in Condition 3.31. The performance test shall be conducted no later than one hundred eighty (180) calendar days after initial startup and subsequent performance testing shall be conducted once every five (5) years [no later than sixty-one (61) months following the previous completed performance test]. All testing shall be conducted according to the following requirements:

- (a) The performance test shall be conducted using the test methods in Table 4 of Subpart DDDD.
- (b) The permittee must conduct each performance test based on representative performance (i.e., performance based on representative operating conditions as defined in 40 CFR 63.2292) of the unit for the period being tested. Representative conditions exclude periods of startup and shutdown. Performance tests may not be conducted during periods of malfunction. The representative operating conditions must be described in the performance test report for the process and control systems with an explanation of why they are representative. The process information that is necessary to document operating conditions during the test must be recorded and include an explanation to support that such conditions are representative. Upon request, the permittee shall make available to the MDEQ such records as may be necessary to determine the conditions of performance tests.
- (c) The performance test shall consist of three separate test runs. Each test run must last at least one (1) hour.
- (d) Sampling sites must be located at the inlet and outlet of the control device and prior to any releases to the atmosphere.
- (e) All nondetect data (as defined in 40 CFR 63.2292) must be treated as one-half of the method detection limit when determining total hydrocarbon (THC) emission rates.
- (f) The permittee must calculate the percent reduction of total HAP as THC across the control system using the following equation:

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

Where:

PR = percent reduction, percent;

CE = capture efficiency, percent;

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

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

- (g) The permittee shall collect operating parameter monitoring system data at least every fifteen (15) minutes during the entire performance test and establish the thermal oxidizer operating parameters according to the following requirements:
- (1) During the performance test, the permittee must continuously monitor the firebox temperature during each of the required 1-hour test runs.
  - (2) The permittee may measure the temperature in multiple locations (e.g., one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature.
  - (3) The minimum firebox temperature must then be established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs.
  - (4) Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.
  - (5) The permittee may establish a different minimum firebox temperature for the thermal oxidizer by submitting the notification specified in 40 CFR 63.2280(g) and conducting a repeat performance test as specified in paragraphs (1) - (4) above that demonstrates compliance with the HAP destruction efficiency standard.

(Ref.: 40 CFR 63.2260(a), 63.2261(a) and Table 7 (Item 7); Subpart DDDD)

- 5.22 For Emission Points AA-040 and AA-041, the permittee shall install, operate, and maintain a continuous parameter monitoring system (CPMS) for the monitoring of the firebox temperature in each RTO, according to the following requirements:
- (a) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
  - (b) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
  - (c) Record the results of each inspection, calibration, and validation check.
  - (d) Locate the temperature sensor in a position that provides a representative temperature.
  - (e) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.
  - (f) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.

- (g) Validate the temperature sensor's reading at least semiannually using following the requirements in 40 CFR 63.2269(b)(4) of Subpart DDDD;
- (h) Conduct validation checks using the procedures in 40 CFR 63.2269(b)(4) of Subpart DDDD any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- (i) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

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

5.23 For Emission Points AA-040 and AA-041, to demonstrate continuous compliance with Condition 3.31, the permittee shall monitor the firebox temperature in each RTO using the CPMS installed in accordance with Condition 5.22 and collect, record, and reduce the temperature monitoring data according to the following requirements:

- (a) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
- (b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities or data recorded during periods of safety-related shutdown in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system.
- (c) The permittee shall determine the 3-hour block average of all recorded temperature readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (a) and (b)).
- (d) To calculate the data averages for each 3-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in paragraphs (a) and (b)).

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

- 5.24 For Emission Point AA-040 and AA-041, the permittee shall maintain documentation on the following information:
- (a) A copy of each notification and report submitted to comply with Subpart DDDD (including all supporting documentation).
  - (b) Records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions, in accordance with 40 CFR 63.2282(a)(2)(i) – (iv), Subpart DDDD.
  - (c) The results for all performance tests and continuous monitoring system (CMS) performance evaluations.
  - (d) Records that demonstrate the plan for minimizing fugitive emissions is followed.
  - (e) Records that demonstrate only non-HAP coatings are being used in all Group 1 miscellaneous coating operations.
  - (f) Records that demonstrate the requirements for a safety-related shutdown of a dryer and/or a RTO are being followed.
  - (g) Records that demonstrate the requirements for startup/shutdown of the dryer burners are being followed.
  - (h) The written CMS quality control procedures and program of corrective action (as specified in 40 CFR 63.8(d)(2)) for the life of the process unit (or until the process unit is no longer subject to Subpart DDDD).
  - (i) If the performance evaluation plan is revised, the permittee shall keep previous (i.e. superseded) versions of the performance evaluation plan on record to be made available for inspection for a period of five (5) years after each revision to the plan.

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

- 5.25 For Emission Point AA-042, the permittee shall monitor and record the total plywood production in MSF (3/8") both on a monthly basis and a rolling 12-month total basis.

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

- 5.26 For Emission Point AA-043, the permittee shall evaluate the emission of PM<sub>10</sub> (filterable + condensable) and PM<sub>2.5</sub> (filterable + condensable) by conducting performance testing no later than one hundred eighty (180) days after initial startup. The permittee shall conduct subsequent performance testing once every five (5) years [no later than sixty-one (61) months following the previous completed performance test].

The permittee shall establish applicable operating parameters (e.g. liquid to gas ratio, gas temperature, pressure drop, etc.) for the pollution control device during each PM-related performance test. The permittee shall continuously monitor and record each parameter (as applicable) during each test run.

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

## SECTION 6. REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(a)	Report Deviations within Five (5) Working Days
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(b)	Semiannual Reporting
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1(c)	Certification by Responsible Official
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).	6.1(d)	Notification of Beginning Actual Construction within Fifteen (15) Days
	11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).	6.1(e)	Notification When Construction Does Not Being or Is Suspended
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).	6.1(f)	Certification of Completion of Construction Prior to Operation
	11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).	6.1(g)	Notification of Changes in Construction
	40 CFR 52.21(r)(6)(v); Subpart A	6.2	Submit Calculated Annual Emissions for Applicable Construction Project
AA-030	40 CFR 63.7550(a), (b), (c)(1) - (4), (c)(5)(i) – (xiv), (xvii), (xviii), and Table 9; Subpart DDDDD	6.3	Submit a Semi-Annual Compliance Report
	40 CFR 63.7550(a), (b), (c)(2) - (4), (d), (e), and Table 9; Subpart DDDDD	6.4	Submit a Semi-Annual Deviations Compliance Report
	40 CFR 63.7545(d); Subpart DDDDD	6.5	Submit a Notice of Intent for a Performance Test
	40 CFR 63.7550(h); Subpart DDDDD	6.6	Submit Performance Test Results and Applicable Reports
AA-030 AA-040 AA-041 AA-043	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Submit Performance Test Notifications and Reports
		6.8	Submit a Semi-Annual Compliance Report
AA-038 AA-044 AA-045	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.9	Submit an Annual Summary on Hours of Operation (Emergency and Non-Emergency)



Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-040 AA-041 AA-042	40 CFR 63.2280(b); Subpart DDDD	6.10	Submit an Initial Notification
AA-040 AA-041	40 CFR 63.2280(c); Subpart DDDD 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.11	Submit Notification of Intent for Performance Testing
	40 CFR 63.2281(a), (h) – (l), and Table 9; Subpart DDDD	6.12	Submit Performance Test Results
	40 CFR 63.2281(b) and (c); Subpart DDDD	6.13	Submit Semi-Annual Compliance Report
	40 CFR 63.2281(e); Subpart DDDD	6.14	Submit Semi-Annual Deviation Reports

### 6.1 General Reporting Requirements:

- (a) The permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (b) Beginning upon issuance of this permit and lasting until issuance or modification of the applicable operating permit, the permittee shall submit reports of any required monitoring by July 31<sup>st</sup> and January 31<sup>st</sup> for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 2.1.C. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration. For any air emissions equipment not yet constructed and/or operating the report shall so note and include an estimated date of commencement of construction and/or startup, whichever is applicable.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (c) Any document required by this permit to be submitted to the DEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- (d) Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

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

- (e) The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

- (f) Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

- (g) The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

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

6.2 For Emission Point AA-000 (Facility-Wide), the permittee shall submit an annual report to the MDEQ no later than March 1 (or February 29 – when applicable) of each year for the preceding 12-month calendar year that contains the information specified in paragraphs (a) – (c) of this condition **if** the calculated annual emissions required by Condition 5.2 either exceed the baseline actual emissions documented for PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, CO, and VOCs in the pre-construction PSD major modification applicability test by a “significant” amount [as defined in 40 CFR 52.21(b)(23); Subpart A] or differ from the established pre-construction projected emission presented in the permit application.

- (a) The name, address, and telephone number of the facility;
- (b) The calculated annual emissions as specified in Condition 5.2; and
- (c) Any other information that the permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the established pre-construction projections)

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

6.3 For Emission Point AA-030, the permittee shall submit a semi-annual compliance report in accordance with Condition 6.1 that contains the following information:

- (a) The company (and facility name, if applicable) and the address;

- (b) Information on the process unit, applicable emission limitations, and applicable operating parameter limitations;
- (c) The total operating time during the reporting period;
- (d) For each COMS and CMS – the monitoring equipment manufacturer(s), the model number(s), and the date of the last CMS certification or audit;
- (e) The total fuel use by the boiler during the reporting period including (but not limited to) a description of the fuel, whether the fuel has received a non-waste determination by the EPA or the permittee’s basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure;
- (f) If the permittee is conducting a performance test once every three (3) years [as allowed in Condition 5.10], report the date of the last two (2) performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions;
- (g) A statement indicating no new types of fuel were burned in the boiler. If a new type of fuel was burned, the permittee shall submit the required hydrogen chloride (HCl), mercury (Hg), and total selected metals (TSM) information in accordance with 40 CFR 63.7550(c)(5)(viii), Subpart DDDDD;
- (h) If the permittee intends to burn a new type of fuel that is non-compliant with the maximum chlorine, mercury or TSM input operating limitations, the permittee shall include a statement indicating the intent to conduct a new performance test no later than sixty (60) days after starting to burn the new fuel;
- (i) A summary of any monthly fuel analyses demonstrating compliance with Condition 5.11;
- (j) If there are no deviations from applicable emission limitations or operating limitations, include a statement that there were no deviations from the emission or operating limitations during the reporting period;
- (k) If there were no deviations from monitoring requirements (including no periods during which a CMS or COMS was out of control), include a statement that there were no deviations and no periods during which the monitoring system was out of control during the reporting period;
- (l) If a malfunction occurred during the reporting period, the report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused / may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction of the boiler or control device or CMS to minimize emissions in accordance with Condition 4.1 including actions taken to correct the malfunction.
- (m) The date of the most recent tune-up, including the date of the most recent burner inspection (if delayed until the next scheduled unit shutdown);

- (n) 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.
- (o) For each instance of start-up or shutdown, include the information required to be monitored, collected, or recorded according to Condition 5.8;  
(Ref.: 40 CFR 63.7550(a), (b), (c)(1) - (4), (c)(5)(i) – (xiv), (xvii), (xviii), and Table 9; Subpart DDDDD)

6.4 For Emission Point AA-030, the permittee shall submit a semi-annual deviation compliance report in accordance with Condition 6.1 that contains the following information:

- (a) If there is a deviation from an emission limit, operating limit, or work practice standard for periods of start-up and shutdown where a CMS is not used to demonstrate compliance, the compliance report shall contain the following information:
  - (1) A description of the deviation and from which emission limit, operating limit, or work practice standard was deviated;
  - (2) Information on the number, duration, and cause of deviations (including any unknown cause, as applicable), and the corrective action taken; and
  - (3) If the deviation occurred during an annual performance test, provide the date the annual performance test was completed.
- (b) If there is a deviation from an emission limit, operating limit, or monitoring requirement where a CMS is used to demonstrate compliance, the compliance report shall contain the following information:
  - (1) The date and time each deviation started and stopped and description of the nature of the deviation;
  - (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 in 40 CFR 63.8(c)(8), Subpart A;
  - (4) A summary of the total duration of the deviation during a reporting period and the total duration as a percent of the total source operating time during that reporting period;
  - (5) A characterization of the total duration of the deviations during a reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
  - (6) A summary of the total downtime duration for the CMS during a reporting period and the total duration of the CMS downtime as a percent of the total source operating time during that reporting period;

- (7) A brief description of the source for which there was a deviation; and
- (8) A description of any changes in the CMS, the processes, or controls since the last reporting period for the source for which there was a deviation.

(Ref.: 40 CFR 63.7550(a), (b), (c)(2) - (4), (d), (e), and Table 9; Subpart DDDDD)

- 6.5 For Emission Point AA-030, the permittee shall submit a notification of intent to conduct a performance test required by Condition 5.10 to the MDEQ at least sixty (60) days before the performance test is scheduled to begin.

(Ref.: 40 CFR 63.7545(d); Subpart DDDDD)

- 6.6 For Emission Point AA-030, the permittee shall submit the results from any performance test, including any fuel analyses, required by Conditions 5.10 and 5.11 to the MDEQ and EPA no later than sixty (60) days after completing each test.

Additionally, the permittee shall submit any performance test report, compliance report, and/or COMS performance evaluation required by Subpart DDDDD to the EPA via the CEDRI. CEDRI can be accessed through the EPA's Central Data Exchange (CDX) website [<https://cdx.epa.gov/>]. Each electronic submittal shall be completed in accordance with 40 CFR 63.7550(h), Subpart DDDDD.

(Ref.: 40 CFR 63.7550(h); Subpart DDDDD)

- 6.7 For Emission Points AA-030, AA-040, AA-041, and AA-043, the permittee shall submit the following notifications, information, and/or reports for the performance tests required in Conditions 5.5, 5.6, 5.19, and 5.25:

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

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

- 6.8 For Emission Points AA-030, AA-040, AA-041, and AA-043, the permittee shall submit a semi-annual report, in accordance with Condition 6.1(b), that contains the emission of PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, CO, and VOCs from each source (as applicable) in tons both on a monthly basis and rolling 12-month total basis.

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

- 6.9 For Emission Points AA-038, AA-044 and AA-045, the permittee shall submit a summary within the semi-annual monitoring report postmarked by January 31 that details the hours of operation for each engine during the preceding calendar year. The report shall include how many hours are spent for emergency operation, what classified the operation as an emergency, how many hours are spent for non-emergency operation, and the reason for the non-emergency operation.  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.10 For Emission Points AA-040, AA-041, and AA-042, the permittee shall submit an Initial Notification no later than one hundred twenty (120) calendar days after initial startup via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) website [<https://cdx.epa.gov/>]. Each electronic submittal shall be completed in accordance with 40 CFR 63.2281(h), (k), and (l) of Subpart DDDD.  
(Ref.: 40 CFR 63.2280(b); Subpart DDDD)
- 6.11 For Emission Points AA-040 and AA-041, the permittee shall submit a written notification of intent to conduct a performance test at least sixty (60) calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1).  
The permittee shall notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.  
If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.  
(Ref.: 40 CFR 63.2280(c); Subpart DDDD)  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.12 For Emission Points AA-040 and AA-041, the permittee shall submit the results of any conducted performance test to the MDEQ no later than sixty (60) days after completing the testing event.  
Additionally, the permittee shall submit any performance test report and/or CMS performance evaluation required by Subpart DDDD via CEDRI in accordance with 40 CFR 63.2281(h) – (l) of Subpart DDDD.  
(Ref.: 40 CFR 63.2281(a), (h) – (l), and Table 9; Subpart DDDD)
- 6.13 For Emission Points AA-040 and AA-041, upon startup, the permittee shall submit a compliance report that covers the period of at least six (6) months [but does not exceed twelve (12) months] and ends on either June 30 or December 31. The first compliance report must be postmarked or delivered no later than July 31st (for a compliance period ending on June 30th) or January 31st (for a compliance period ending December 31st). Thereafter, the permittee shall submit subsequent semi-annual compliance reports no later than January 31st and July 31st of each calendar year for the previous six-month period. The permittee shall submit the compliance report via CEDRI in accordance with

40 CFR 63.2281(h) – (l) of Subpart DDDD. Any required compliance report shall contain the following information:

- (a) The company name and address;
- (b) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
- (c) A date for the specified report and the beginning / ending dates of the reporting period;
- (d) If the startup / shutdown work practice in Condition 4.7 is used for more than a total of one hundred (100) hours during the semiannual reporting period, include the date, time and duration of each instance when that shutdown work practice was used.
- (e) A description of any maintenance performed on a regenerative thermal oxidizer (RTO) while the control device was offline and any process units were still in operation, including the following information:
  - (1) The date and time when the RTO was shut down and restarted.
  - (2) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
- (f) A statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
- (g) A statement that there were no periods during which the CMS was out-of-control (as specified in 40 CFR 63.8(c)(7)) during the reporting period.

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

6.14 For Emission Points AA-040 and AA-041, the permittee shall submit a semi-annual report that details each deviation from a specified compliance option or operating requirement by the temperature monitoring system (including periods of start-up, shutdown, malfunction, and routine control device maintenance) no later than July 31 and January 31 of each calendar year for the previous six-month period. Any required report shall contain the following information:

- (a) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
- (b) The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
- (c) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction;
- (d) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
- (e) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control

device maintenance, process problems, other known causes, and other unknown causes.

- (f) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
- (g) A brief description of the process units.
- (h) A brief description of the CMS.
- (i) The date of the latest CMS certification or audit.
- (j) A description of any changes in CMS, processes, or controls since the last reporting period.
- (k) For any failure to meet the compliance option in Condition 3.30, provide an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.

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