

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

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Oil Dri Production Company  
1800 1/2 Highway 15 North  
Ripley, Tippah County, Mississippi

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

**Permit Issued: December 8, 2020**

**Modified: March 29, 2022**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: November 30, 2025**

**Permit No.: 2620-00014**

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## SECTION 1. GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

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

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

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

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

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

- 1.27 Regarding compliance testing (if applicable):

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

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

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

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

| Emission Point | Description   |
|----------------|---|
| AA-000         | Facility-Wide [Oil Dri Production Company]  |
| AA-001*        | No. 2 LVM Calciner / RVM Dryer System [30 Tons Per Hour (TPH) LVM / 50 TPH RVM; total heat input: 52.5 MMBTU / hour – capable of combusting natural gas, virgin fuel oil, or on-spec. used fuel oil (Oil-Dri Ref. No. 1); equipped with a cooler (Oil-Dri Ref. No. 7) and a scrubber (Oil-Dri Ref. No. 1C); manufactured prior to 1977]<br><br><i>*the unit can be operated as either a calciner or a dryer</i> |
| AA-003         | No. 1 LVM Calciner System [27.1 TPH; total heat input: 22 MMBTU / hour – capable of combusting natural gas, virgin fuel oil, or on-spec. used fuel oil; consists of a calciner (Oil-Dri Ref. No. 4) and a cooler (Oil-Dri Ref. No. 6) and equipped with a cyclone (Oil-Dri Ref. No. 6A) followed by a wet scrubber (Oil-Dri Ref. No. 6B)]   |
| AA-004         | Mill Room Baghouse (Oil-Dri Ref. No. 2620-B)  |
| AA-005         | Bulk Loading Baghouse [used for product transfer and product de-dusting] (Oil-Dri Ref. No. 2620-C)  |
| AA-006         | Southeast Mill Room Baghouse (Oil-Dri Ref. No. 2620-D)  |
| AA-007         | Griffin Packaging Baghouse [for product bulk loading and bulk bagging] (Oil-Dri Ref. No. 2620-E)  |
| AA-008         | Kice Product De-dusting Baghouse [for product packaging] (Oil-Dri Ref. No. 2620-F)  |
| AA-009         | Old New York South Mill Room Baghouse (Oil-Dri Ref. No. 2620-G)   |
| AA-010         | Old New York North Mill Room Baghouse   |
| AA-011         | RVM Dryer [75 TPH; total heat input: 100 MMBTU / hour – capable of combusting natural gas, virgin fuel oil or on-spec. used fuel oil (Oil-Dri Ref. No. 7); equipped with a cooler (Oil Dri Ref. No. 3) and a wet scrubber (Oil-Dri Ref. No. 7A) followed by a packed tower scrubber]  |
| AA-012         | RVM Mill Room (Oil-Dri Ref. No. X2) [equipped with a baghouse]  |
| AA-013         | Product Screening Area (Oil-Dri Ref. No. X3) [equipped with a baghouse]   |
| AA-014         | North Out-of-Spec. Silo Baghouse  |
| AA-015         | Surge In-Spec. Silo Baghouse  |
| AA-016         | 6.0 TPH Clay Dryer No. 1 [equipped with a 14.76 MMBTU / hour natural gas or fuel oil-fired burner; emissions controlled by a scrubber]  |
| AA-017         | 6.0 TPH Clay Dryer No. 2 [equipped with a 14.76 MMBTU / hour natural gas or fuel oil-fired burner; emissions controlled by a scrubber]  |

| <b>Emission Point</b> | <b>Description</b>  |
|-----------------------|---|
| AA-018                | Product Storage, Bulk Bag Loading, Rail Loading, and Truck Loading Baghouse |
| AA-021                | Additive Mixer System and Packaging Machine Baghouse                        |
| AA-022                | No. 1 Mill Room Baghouse  |
| AA-023                | No. 2 Mill Room Baghouse  |
| AA-024                | Pellet Mix / Extrude Process Baghouse                                       |

### **SECTION 3. EMISSION LIMITATIONS & STANDARDS**

#### **A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS**

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

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

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

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

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

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

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

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

**B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS**

| Emission Point(s)                              | Applicable Requirement   | Condition Number | Pollutant / Parameter   | Limit / Standard  |
|--|--|------------------|---|---|
| AA-000<br>(Facility-Wide)                      | 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued March 29, 2022<br><b>(PSD Avoidance Limits)</b>  | 3.B.1            | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)<br><br>SO <sub>2</sub> | 249.0 tpy (Rolling 12-Month Totals)   |
|  | 11 Miss. Admin. Code Pt. 2, R. 1.4.F(1).   | 3.B.2            | PM<br>(filterable)  | E = 4.1 (p <sup>0.67</sup> )  |
|  | 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued March 29, 2022<br><b>(PSD Avoidance Limit)</b>   | 3.B.3            | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)                        | No Bypass of Air Pollution Control Equipment  |
|  | 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)<br>40 CFR 64.2(a); CAM  | 3.B.4            | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)                        | General Applicability   |
| AA-001<br>AA-003<br>AA-011<br>AA-016<br>AA-017 | 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).  | 3.B.5            | PM<br>(filterable)  | E = 0.8808 · (I <sup>-0.1667</sup> )  |
| AA-001<br>AA-003<br>AA-011                     | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued on December 17, 1996 and modified on December 10, 1997 | 3.B.6            | Fuel Restriction  | Only Combust Natural Gas, Virgin Fuel Oil, or On Spec. Used Fuel Oil<br><u>When Burning Fuel Oils:</u><br>≤ 1.0% Sulfur by Weight                               |
| AA-003<br>AA-011<br>AA-016<br>AA-017           | 40 CFR Part 60, Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries<br>40 CFR 60.730(a) and (c); Subpart UUU     | 3.B.7            | PM<br>(filterable)  | General Applicability   |
|  | 40 CFR 60.732(a); Subpart UUU  | 3.B.8            | PM<br>(filterable)  | 0.040 grains / dscf (or 0.092 grams / dscm) [Emission Point AA-003]<br>0.025 grains / dscf (or 0.057 grams / dscm) [Emission Points AA-011, AA-016, and AA-017] |
| AA-016<br>AA-017                               | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued on December 9, 2008                                    | 3.B.9            | Fuel Restriction  | <u>When Burning Fuel Oils:</u><br>≤ 0.5% Sulfur by Weight   |

| Emission Point(s)   | Applicable Requirement  | Condition Number | Pollutant / Parameter | Limit / Standard   |
|---|---|------------------|-----------------------|--|
| AA-004 through AA-010<br>AA-012 through AA-015<br>AA-018 through AA-021<br>AA-024 | 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants<br><br>40 CFR 60.670(a)(1), (e) and (f); Subpart OOO | 3.B.10           | PM (filterable)       | General Applicability                                      |
| AA-004 through AA-010<br>AA-012 through AA-015<br>AA-018                          | 40 CFR 60.672(a), (b), (d), (f), Table 2 and Table 3; Subpart OOO   | 3.B.11           | PM (filterable)       | 0.022 grains / dscf (or 0.050 grams / dscm)                |
|   |   |                  | Opacity               | ≤ 7.0% (from each baghouse);<br>≤ 10% (fugitive emissions) |
| AA-021 through AA-024   | 40 CFR 60.672(a), (b), (d), Table 2 and Table 3; Subpart OOO  | 3.B.12           | PM (filterable)       | 0.014 grains / dscf (or 0.032 grams / dscm)                |
|   |   |                  | Opacity               | ≤ 7.0% (fugitive emissions)                                |

3.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall limit the total respective emission of particulate matter (PM), particulate matter less than 10 microns in diameter (PM<sub>10</sub> – filterable only), particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub> – filterable only), and sulfur dioxide (SO<sub>2</sub>) to no more than 249.0 tons per year (tpy) based on a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued March 29, 2022 – PSD Avoidance Limits)

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

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

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

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

- 3.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall not allow emissions to bypass the air pollution control equipment associated with a corresponding process unit. During any period when control equipment fails and/or malfunctions, the permittee shall cease operations from the process unit that is directly associated with the corresponding control equipment until the control equipment is returned to service.

(Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued March 29, 2022 – PSD Avoidance Limit)

- 3.B.4 For Emission Point AA-000 (Facility- Wide), the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

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

- 3.B.5 For Emission Points AA-001, AA-003, AA-011, AA-016 and AA-017, the maximum emission of ash and/or particulate matter (PM) shall not exceed an emission rate as determined by the following relationship:

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

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

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

- 3.B.6 For Emission Points AA-001, AA-003 and AA-011, the permittee shall only use natural gas, virgin fuel oil with no more than 1.0% sulfur by weight, and on-specification (“on-spec.”) used oil with no more than 1.0% sulfur by weight as fuel sources. Additionally, the permittee shall comply with all applicable requirements found in 40 CFR Part 279, Used Oil Management Standards.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued December 17, 1996 and modified December 10, 1997)

- 3.B.7 For Emission Points AA-003, AA-011, AA-016 and AA-017, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries and 40 CFR Part 60, Subpart A – General Provisions.

(Ref.: 40 CFR 60.730(a) and (c); Subpart UUU)

- 3.B.8 For Emission Points AA-003, AA-011, AA-016 and AA-017, the permittee shall not allow emissions to be discharged into the atmosphere from any equipment that contains particulate matter (PM) in excess of the following limitations (as applicable):

(a) 0.040 grains per dry standard cubic foot (gr./dscf) [or 0.092 grams per dry standard cubic meter (g./dscm)] from calciners and from calciners and dryers installed in series; or

(b) 0.025 gr./dscf (or 0.057 g./dscm) from dryers.

(Ref.: 40 CFR 60.732(a); Subpart UUU)

3.B.9 For Emission Points AA-016 and AA-017, the permittee shall only use natural gas and/or fuel oil with no more than 0.5 percent sulfur by weight as fuel sources.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Permit to Construct issued on December 9, 2008)

3.B.10 For Emission Points AA-004 through AA-010, AA-012 through AA-015, AA-018 and AA-021 through AA-024, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 1 of Subpart OOO).

(Ref.: 40 CFR 60.670(a)(1), (e) and (f); Subpart OOO)

3.B.11 For Emission Points AA-004 through AA-010, AA-012 through AA-015 and AA-018, the permittee must meet the following limitations:

(a) Particulate matter (PM) of no more than 0.022 grains per dry standard cubic foot (gr./dscf) [or 0.05 grams per dry standard cubic meter (g./dscm)];

(b) An opacity of no more than 7% for emissions from each baghouse; and

(c) An opacity no more than 10% for fugitive emissions from each capture system (including those emitted from a building).

For the purpose of this permit, Emission Points AA-014 and AA-015 (which encompass a baghouse that controls emissions from an individual storage bin) are exempt from the noted PM emission limitation. Additionally, truck dumping into any screening operation, feed hopper, or crusher is exempt from all noted standards.

(Ref.: 40 CFR 60.672(a), (b), (d), (f), Table 2 and Table 3; Subpart OOO)

3.B.12 For Emission Points AA-021 through AA-024, the permittee must meet the following limitations:

(a) A particulate matter (PM) of no more than 0.014 grains per dry standard cubic foot (gr./dscf) [or 0.032 grams per dry standard cubic meter (g./dscm)]; and

(b) An opacity no more than 7% for fugitive emissions from each capture system (including those emitted from a building).

For the purpose of this permit, truck dumping into any screening operation, feed hopper, or crusher is exempt from all noted standards.

(Ref.: 40 CFR 60.672(a), (b), (d), Table 2 and Table 3; Subpart OOO)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

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

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

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

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

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

D. WORK PRACTICE STANDARDS

THIS SECTION WAS INTENTIONALLY LEFT BLANK SINCE NO WORK PRACTICE STANDARDS APPLY TO THIS PERMIT ACTION.

## **SECTION 4. COMPLIANCE SCHEDULE**

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

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

## **SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS**

### **A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

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

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

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

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

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

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

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

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

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semi-annual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April 30, July 31, October 31, and January 31), and any required annual reports shall be submitted by January 31 following each calendar year.

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

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

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

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

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

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

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

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

- 5.A.8 Unless otherwise specified in Section 4, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding Permit to Construct and/or Operate upon permit issuance.

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

**B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS**

| <b>Emission Point(s)</b>                                  | <b>Applicable Requirement</b>   | <b>Condition Number</b> | <b>Pollutant / Parameter Monitored</b>  | <b>Monitoring / Recordkeeping Requirement</b>  |
|---|---|-------------------------|---|--|
| AA-000<br>(Facility-Wide)                                 | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).  | 5.B.1                   | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)<br><br>SO <sub>2</sub> | Calculate the Total Emission of the Applicable Pollutants (Monthly and Rolling 12-Month Totals)  |
|   |   | 5.B.2                   | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)                        | Perform and Record Monthly Inspections on Air Pollution Control Devices  |
|   | 40 CFR 64.7(b) and (c); CAM   | 5.B.3                   | Operation & Maintenance   | Operation and Maintenance Requirements for Monitoring System(s)  |
|   | 40 CFR 64.7(d); CAM   | 5.B.4                   | Corrective Action   | Corrective Action Response to an Excursion / Exceedance of a CAM Indicator   |
|   | 40 CFR 64.8; CAM  | 5.B.5                   | QIP   | Upon Request by the MDEQ, Develop a Quality Improvement Plan (QIP)   |
|   | 40 CFR 64.9(b); CAM   | 5.B.6                   | CAM Records   | Maintain CAM Records as Specified  |
| AA-001<br>AA-003<br>AA-011                                | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).  | 5.B.7                   | SO <sub>2</sub><br><br>Sulfur Content   | Recordkeeping Requirements for Used Oil Management   |
| AA-001<br>AA-003<br>AA-011<br>AA-016<br>AA-017            | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).  | 5.B.8                   | SO <sub>2</sub><br><br>Sulfur Content   | Monitoring / Recordkeeping Requirements if Virgin Fuel Oil or On-Spec. Used Fuel Oil is Combusted  |
|   | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).`  | 5.B.9                   | PM<br><br>SO <sub>2</sub>   | Conduct Routine Performance Testing (As Applicable)  |
|   | 40 CFR 64.3(a) and (b), 64.6(c); CAM  | 5.B.10                  | Pressure Drop<br><br>Flow Rate  | CAM Requirements: Continuously Monitor Pressure Drop and Scrubbing Liquid Flow Rate<br><br>Conduct Routine Inspections / Calibrations on Each Scrubber |
| AA-003<br>AA-011<br>AA-016<br>AA-017                      | 40 CFR 60.734(d) and 60.735(b); Subpart UUU   | 5.B.11                  | Pressure Drop<br><br>Flow Rate  | Monitor and Record the Pressure Drop Across the Scrubbers and the Scrubbing Liquid Flow Rate   |
| AA-004<br>through<br>AA-010<br>AA-012<br>AA-013<br>AA-024 | 40 CFR 60.672(a) and 60.675(b)(1) – (2); Subpart OOO<br><br>11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). | 5.B.12                  | PM<br><br>Opacity   | Conduct Routine Performance Testing (for PM)<br><br>Conduct Initial Opacity Testing  |

| Emission Point(s)  | Applicable Requirement               | Condition Number | Pollutant / Parameter Monitored | Monitoring / Recordkeeping Requirement   |
|--|--------------------------------------|------------------|---------------------------------|--|
| AA-004 through AA-010 AA-012 through AA-015 AA-018 AA-021 through AA-024 | 40 CFR 64.3(a) and (b), 64.6(c); CAM | 5.B.13           | Pressure Drop                   | CAM Requirements: Monitor Pressure Drop Daily<br>Conduct Routine Inspections / Calibrations on Each Baghouse |
| AA-018 AA-021 through AA-024   | 40 CFR 60.674(c); Subpart OOO        | 5.B.14           | Opacity                         | Perform a Quarterly Visible Emission Inspection  |

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall calculate and record the total respective emission of particulate matter (PM), particulate matter less than 10 microns in diameter (PM<sub>10</sub> – filterable only), particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub> – filterable only), and sulfur dioxide (SO<sub>2</sub>) in tons both on a monthly and rolling 12-month total basis.

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

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

5.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall perform and record a monthly inspection that evaluates the performance capability of the air pollution control device associated with each process unit. 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 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, any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed, and any periods of time (including date and duration) in which a control device failed / malfunctioned.

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

5.B.3 For Emission Point AA-000 (Facility-Wide), the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper maintenance*: The permittee shall maintain the monitoring, including (but not limited to) maintaining necessary parts for routine repairs of the monitoring equipment at all times.
- (b) *Continued operation*: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities [including calibration checks and required zero adjustments, and required span adjustments (as applicable)], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used [including in data averaging and calculations or in fulfilling a minimum data availability requirement (as applicable)].

The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

- 5.B.4 For Emission Point AA-000 (Facility-Wide), upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard (as applicable).

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

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

- 5.B.5 For Emission Point AA-000 (Facility-Wide), based on the results of a determination made under Condition 5.B.4, in addition to the excursion threshold outlined in each CAM

Plan, the MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) that contains the elements specified in 40 CFR 64.8(b).

The QIP shall be developed and implemented within one hundred eighty (180) days of written notification from the MDEQ that a QIP is required. The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

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

- 5.B.6 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.5 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions (as applicable).

As applicable, the records of monitoring data and monitoring performance data should include the date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

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

- 5.B.7 For Emission Points AA-001, AA-003 and AA-011, the permittee shall monitor, record, and maintain adequate documentation to demonstrate compliance with 40 CFR Part 279 – Standards for the Management of Used Oil.

At a minimum, the permittee shall maintain documentation that demonstrates compliance with the on-spec. used oil requirements found in 40 CFR 279.11 for each shipment of used oil received. Additionally, the permittee shall maintain documentation that displays the name, address, phone number, and the EPA identification number for both the used oil marketer and transporter pertaining to each shipment.

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

- 5.B.8 For Emission Points AA-001, AA-003, AA-011, AA-016, and AA-017, the permittee shall monitor and record the following information **if** virgin fuel oil or on-spec. used fuel oil is combusted:

- (a) The fuel oil type and quantity used on a monthly basis;

- (b) The hours of operation for each unit when combusting virgin fuel oil and/or on-spec. used fuel oil; and
- (c) The emission of SO<sub>2</sub> in pounds per hour and tons per year on both a daily and rolling 365-day period.

The permittee shall also monitor and record the sulfur content (in percent weight) of any virgin fuel oil and/or on-spec. used fuel oil combusted through the sampling and analysis of each lot or shipment received.

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

5.B.9 For Emission Points AA-001, AA-003, AA-011, AA-016, and AA-017, the permittee shall demonstrate compliance with the applicable particulate matter (PM) emission limitations specified in Conditions 3.B.1 and 3.B.8 by conducting routine performance stack testing once every five (5) years [and no later than sixty (60) months after the previously completed test] in accordance with the following requirements:

- (a) Performance testing shall be conducted in accordance with EPA Test Method 5. Additionally, the sampling time and volume for each test run shall be at least two (2) hours and 1.70 dscm.
- (b) The permittee shall conduct at least two (2) test runs during each performance test event.
- (c) The permittee shall determine an average change in pressure across the scrubber and an average operating scrubber flowrate by continuously monitoring and recording the pressure and flowrate during each test run for a performance test.
- (c) The permittee shall monitor and record the hourly production rate (in tons) for each run during a performance test.

In the event that the permittee combusts virgin fuel oil or on-spec. used fuel oil, the permittee shall evaluate the emission of SO<sub>2</sub> in accordance with the following requirements no later than ninety (90) days after initial combustion:

- (d) Performance testing shall be conducted accordance with applicable EPA-approved test methods found in Appendix A of 40 CFR Part 60 or an alternative test method approved by the EPA prior to the testing event.
- (e) The permittee shall conduct a minimum of three (3) separate test runs for a performance test as specified in 40 CFR 60.8(f), Subpart A that each span a duration of one (1) hour.
- (f) The permittee shall monitor and record the hourly usage of each fuel source combusted as well as the corresponding hourly heat input rate during a performance test.

If the duration between the most recently completed performance test and the next usage of a noted fuel is more than sixty (60) months, the permittee shall conduct subsequent performance stack testing no later than 90 days after combusting virgin fuel oil or on-spec. used fuel oil.

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

- 5.B.10 For Emission Points AA-001, AA-003, AA-011, AA-016, and AA-017, the permittee shall continuously monitor both the pressure drop across each scrubber and the scrubbing liquid flow rate. Additionally, the permittee shall conduct routine inspections and/or calibrations on each scrubber in accordance with the CAM Plans found in Appendix C.

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

- 5.B.11 For Emission Points AA-003, AA-011, AA-016 and AA-017, the permittee shall install, calibrate, maintain, and operate a monitoring system that continuously measures and records the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. The pressure loss monitoring device must be certified by the manufacturer to be accurate within five (5) percent of water column gauge pressure at the level of operation. The liquid flow rate monitoring device must be certified by the manufacturer to be accurate within five (5) percent of design scrubbing liquid flow rate.

The permittee shall determine and record once each day (based on the recordings of the pressure loss and scrubbing liquid monitoring devices) an arithmetic average over a 2-hour period of both the change in pressure of the gas stream across the scrubber and the flowrate of the scrubbing liquid.

(Ref.: 40 CFR 60.734(d) and 60.735(b); Subpart UUU)

- 5.B.12 For Emission Points AA-004 through AA-010, AA-012, AA-013, and AA-024, the permittee shall demonstrate compliance with the applicable PM emission limitations specified in Conditions 3.B.11 and 3.B.12 by conducting performance testing in accordance with the following requirements:

- (a) The permittee shall use either EPA Test Method 5 or Method 17 where the sample volume is at least 1.70 dscm. For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough (but no higher than 121°C) to prevent water condensation on the filter.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance test as specified in 40 CFR 60.8(f), Subpart A that each last for at least one (1) hour.
- (c) The permittee shall continuously monitor and record the differential pressure drop of each baghouse during each test run.

- (d) For Emission Points AA-004 through AA-010, AA-012, and AA-013, routine testing shall be performed once every five (5) years and no later than sixty (60) months after the previously completed test.
- (e) For Emission Point AA-024, initial testing shall be performed no later than one hundred eighty (180) days after initial start-up. Thereafter, subsequent testing shall be conducted in accordance with paragraph (b) of this condition.

For Emission Point AA-024, the permittee shall also demonstrate initial compliance with the opacity limitation specified in Condition 3.B.12 by conducting a test in accordance with EPA Test Method 9 and 40 CFR 60.11, Subpart A no later than one hundred eighty (180) days after initial start-up.

(Ref.: 40 CFR 60.672(a) and 60.675(b)(1) – (2); Subpart OOO)  
(Ref. 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

- 5.B.13 For Emission Points AA-004 through AA-010, AA-012 through AA-015, AA-018, and AA-021 through AA-024, the permittee shall monitor the pressure drop across each baghouse daily. Additionally, the permittee shall conduct routine inspections and calibrations on each baghouse in accordance with the CAM Plans found in Appendix C.

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

- 5.B.14 For Emission Points AA-018 and AA-021 through AA-024, the permittee shall conduct a 30-minute visible emission inspection in accordance with EPA Test Method 22 (i.e. “Method 22”) once every quarter calendar period while each baghouse is operating.

The permittee may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test simultaneously with a Method 22 test to determine what constitutes normal visible emissions from a corresponding baghouse when it is in compliance with an applicable PM concentration limitation. Upon determining the results, the revised visible emissions success level must be incorporated into the permit.

A test is considered successful if no visible emissions are observed. However, if any visible emissions are observed during an inspection, the permittee shall initiate corrective action within twenty-four (24) hours to either return a baghouse to normal operation or prevent fugitive emissions from escaping a building.

The permittee shall record each Method 22 test (including the date, time, and any corrective actions taken) in a logbook (in written or electronic format) maintained on-site that shall be made available to the MDEQ personnel upon request.

(Ref. 40 CFR 60.674(c); Subpart OOO)

**C. SPECIFIC REPORTING REQUIREMENTS**

| <b>Emission Point(s)</b>  | <b>Applicable Requirement</b>                  | <b>Condition Number</b> | <b>Pollutant / Parameter Monitored</b>  | <b>Reporting Requirement</b>   |
|---|--|-------------------------|---|--|
| AA-000<br>(Facility-Wide)   | 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1). | 5.C.1                   | PM / PM <sub>10</sub> / PM <sub>2.5</sub><br>(filterable only)<br>SO <sub>2</sub> | Submit a Semi-Annual Monitoring Report   |
|   | 40 CFR 64.9(a); CAM                            | 5.C.2                   | CAM Reporting   | Semi-Annual Reporting Requirements   |
|   | 40 CFR 64.7(e); CAM                            | 5.C.3                   | CAM Modification  | Promptly Notify the MDEQ of Failure to Achieve Limit/Standard though No Excursion or Exceedance Was Indicated by Approved Monitoring |
| AA-001<br>AA-003<br>AA-011<br>AA-016<br>AA-017  | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).      | 5.C.4                   | Fuel Usage<br>Sulfur Content  | If Virgin Fuel Oil or On-Spec. Used Fuel Oil is Combusted, Notify the MDEQ within 15 Days of Combustion                              |
|   |  | 5.C.5                   |   | Submit a Quarterly Report (As Applicable)  |
| AA-003<br>AA-011<br>AA-016<br>AA-017  | 40 CFR 60.735(c)(2) – (3); Subpart UUU         | 5.C.6                   | PM  | Semi-Annual Exceedance Reporting Requirements  |
| AA-001<br>AA-003<br>AA-004<br>through<br>AA-010<br>AA-011<br>AA-012<br>AA-013<br>AA-016<br>AA-017<br>AA-024 | 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).      | 5.C.7                   | PM<br>SO <sub>2</sub><br>Opacity  | Stack Test Reporting Requirements  |
| AA-024  | 40 CFR 60.676(i); Subpart OOO                  | 5.C.8                   | PM  | Submit a Notification on Initial Start-Up  |

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that details the following information:

- (a) The total respective emission of particulate matter (PM), filterable particulate matter less than 10 microns in diameter (PM<sub>10</sub>), filterable particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and sulfur dioxide (SO<sub>2</sub>) in tons both on a

monthly and rolling 12-month total basis;

- (b) A description of any control device maintenance performed while a specific control device was offline and one or more of the associated process units controlled by the control device was operating that also includes the following information:
  - (1) The date and time when the control device was shut down and restarted; and
  - (2) An identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
- (c) A certification that signifies no virgin fuel oil or on-spec used fuel oil was combusted.

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

5.C.2 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 with the following information (as applicable):

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

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

5.C.3 For Emission Point AA-000 (Facility-Wide), if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

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

- 5.C.4 For Emission Points AA-001, AA-003, AA-011, AA-016 and AA-017, the permittee shall notify the MDEQ on the usage of virgin fuel oil or on-spec. used fuel oil as a fuel source no later than fifteen (15) days after initial combustion.

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

- 5.C.5 For Emission Points AA-001, AA-003, AA-011, AA-016 and AA-017, the permittee shall submit a quarterly report in accordance with Condition 5.A.4 that details the following information if virgin fuel oil or on-spec. used fuel oil is combusted:

- (a) The maximum amount of each fuel used on each day;
- (b) The total quantity of each fuel used on a rolling 365-day period;
- (c) The maximum sulfur content of each applicable fuel shipment received. When no shipment is received, the report shall include an appropriate negative declaration.
- (d) The information specified in Condition 5.B.8 for any received used oil shipment in which the oil does not meet the specifications outlined in Conditions 3.B.6 and 3.B.9 and how this shipment was handled.

If the permittee does not combust any virgin fuel oil or on-spec. used fuel oil, the permittee is exempt from the reporting requirements of this condition.

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

- 5.C.6 For Emission Points AA-003, AA-011, AA-016 and AA-017, the permittee shall submit a semi-annual report of exceedances of a wet scrubber's operating parameters in accordance with Condition 5.A.4 where exceedances are defined as follows:

- (a) Any daily two (2) hour average of the wet scrubber pressure drop that is less than ninety (90) percent of the average value recorded during the most recent performance test that demonstrated compliance with the PM standard; or
- (b) Each daily wet scrubber liquid flow rate that is less than eighty (80) percent or greater than hundred and twenty (120) percent of the average value recorded during the most recent performance test that demonstrated compliance with the PM standard.

(Ref.: 40 CFR 60.735(c)(2) – (3); Subpart UUU)

- 5.C.7 For Emission Points AA-001, AA-003, AA-004 through AA-010, AA-011, AA-012, AA-013, AA-016, AA-017 and AA-024, the permittee shall submit the following notifications, information, and reports for any performance test required by Conditions 5.B.9 and 5.B.12:

- (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.

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

- (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 performance test results shall be submitted to the MDEQ no later than sixty (60) days after the completion of the performance test. Additionally, the permittee shall submit a summary of the results of any required periodic and/or parametric monitoring to be recorded during the performance testing.

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

- 5.C.8 For Emission Point AA-024, upon completion of construction, the permittee shall notify the MDEQ in writing of the actual date of initial start-up of the source no later than fifteen (15) days after such date. The notification shall include a description of the affected unit, the equipment manufacturer, and the serial number of the equipment (if available).

(Ref.: 40 CFR 60.676(i); Subpart OOO)

**SECTION 6. ALTERNATIVE OPERATING SCENARIOS**

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

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

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

well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

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

# APPENDIX A

## List of Abbreviations Used In this Permit

|                   |  |
|-------------------|--|
| BACT              | Best Available Control Technology  |
| CEM               | Continuous Emission Monitor  |
| CEMS              | Continuous Emission Monitoring System  |
| CFR               | Code of Federal Regulations  |
| CO                | Carbon Monoxide  |
| COM               | Continuous Opacity Monitor   |
| COMS              | Continuous Opacity Monitoring System   |
| DEQ               | Mississippi Department of Environmental Quality  |
| EPA               | United States Environmental Protection Agency  |
| gr/dscf           | Grains Per Dry Standard Cubic Foot   |
| HP                | Horsepower   |
| HAP               | Hazardous Air Pollutant  |
| lb/hr             | Pounds per Hour  |
| M or K            | Thousand   |
| MACT              | Maximum Achievable Control Technology  |
| MM                | Million  |
| MMBTUH            | Million British Thermal Units per Hour   |
| NA                | Not Applicable   |
| NAAQS             | National Ambient Air Quality Standards   |
| NESHAP            | National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63 |
| NMVOC             | Non-Methane Volatile Organic Compounds   |
| NO <sub>x</sub>   | Nitrogen Oxides  |
| NSPS              | New Source Performance Standards, 40 CFR 60  |
| O&M               | Operation and Maintenance  |
| PM                | Particulate Matter   |
| PM <sub>10</sub>  | Particulate Matter less than 10 µm in diameter   |
| PM <sub>2.5</sub> | Particulate Matter less than 2.5 µm in diameter  |
| ppm               | Parts per Million  |
| PSD               | Prevention of Significant Deterioration  |
| SIP               | State Implementation Plan  |
| SO <sub>2</sub>   | Sulfur Dioxide   |
| SSM               | Startup, Shutdown, and Malfunction   |
| TPY               | Tons per Year  |
| TRS               | Total Reduced Sulfur   |
| VEE               | Visible Emissions Evaluation   |
| VHAP              | Volatile Hazardous Air Pollutant   |
| VOHAP             | Volatile Organic Hazardous Air Pollutant   |
| VOC               | Volatile Organic Compound  |

## **APPENDIX C**

### **COMPLIANCE ASSURANCE MONITORING (CAM) PLANS**

The table below is the CAM Plan for Emission Point AA-001:

|  | <b>INDICATOR NO. 1</b>  | <b>INDICATOR NO. 2</b>   |
|--|---|--|
| <b>Indicator</b>                       | Pressure Drop   | Scrubber Water Flow Rate   |
| <b>Measurement Approach</b>            | Pressure drop is measured using a differential pressure gauge   | Scrubber water flow rate is measured using a flow meter.   |
| <b>Monitoring Methods and Location</b> | Continuously monitor the pressure drop across the scrubber  | Scrubber water flow rate will be continuously monitored.   |
| <b>Indicator Range</b>                 | <p>Pressure drop across scrubber is greater than 4.1 inches of water</p> <p>Pressure drop compliance values to be re-assessed and adjusted if necessary at each subsequent permit required stack test for PM for this source.</p> | <p>+/- 20% of observed water flow rate during most recent passing test (per NSPS). Currently, water flow rate to the scrubber is between 100-300 gpm.</p> <p>Water flow compliance values to be reassessed and adjusted if necessary at each subsequent permit-required stack test for particulate matter.</p> |
| <b>Data Collection Frequency</b>       | Pressure drop measured continuously   | Water flow rate to the scrubber measured continuously.   |
| <b>Averaging Period</b>                | 2 hour average for pressure drop (per NSPS)   | 2 hour average for water flow rate (per NSPS)  |
| <b>Recordkeeping</b>                   | Records of pressure drop will be kept at the facility for a period of five (5) years.   | Water flow rate records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years.  |
| <b>QA/QC</b>                           | <p>Monthly maintenance inspections</p> <p>Annual pressure drop gauge calibration</p>  | <p>Monthly maintenance inspections and annual flow meter calibration.</p>  |

The table below is the CAM Plan for Emission Point AA-003:

|  | <b>INDICATOR NO. 1</b>   | <b>INDICATOR NO. 2</b>  |
|--|--|---|
| <b>Indicator</b>                       | Pressure Drop  | Scrubber Water Flow Rate  |
| <b>Measurement Approach</b>            | Pressure drop is measured using a differential pressure gauge  | Scrubber water flow rate is measured using a flow meter.  |
| <b>Monitoring Methods and Location</b> | Continuously monitor the pressure drop across the scrubber   | Scrubber water flow rate will be continuously monitored (per NSPS).   |
| <b>Indicator Range</b>                 | Pressure drop across scrubber is greater than 4.1 inches of water<br><br>Pressure drop compliance values to be re-assessed and adjusted if necessary at each subsequent permit required stack test for PM for this source. | +/- 20% of observed water flow rate during most recent passing test (per NSPS).   |
| <b>Data Collection Frequency</b>       | Pressure drop measured continuously  | Measure water flow rate to the scrubber on a continuous basis.  |
| <b>Averaging Period</b>                | 2 hour average for pressure drop (per NSPS)  | 2-hour average for water flow rate to the scrubber (per NSPS).  |
| <b>Recordkeeping</b>                   | Records of pressure drop will be kept at the facility for a period of five (5) years.  | Water flow rate records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years. |
| <b>QA/QC</b>                           | Monthly maintenance inspections<br>Annual pressure drop gauge calibration  | Monthly maintenance inspections and annual flow meter calibration.  |

The table below is the CAM Plan for Emission Points AA-004 through AA-010, AA-012 through AA-015, AA-018, and AA-021 through AA-024

|   | <b>INDICATOR NO. 1</b>   | <b>INDICATOR NO. 2</b>  |
|---|--|---|
| <b>Indicator</b>                        | Baghouse Pressure Drop   | Opacity   |
| <b>Measurement Approach</b>             | Pressure drop across the baghouses is measured daily using a pressure drop gauge.  | Visual emissions are measured weekly using EPA Method 22.   |
| <b>Monitoring Methods and Locations</b> | Monitor baghouse differential pressure across inlet and outlet.  | Observe visible emissions at outlet consistent with Method 22 and Method 9 observation position requirements. |
| <b>Indicator Range</b>                  | AA-004: 2 – 7 inches water<br>AA-005: 2 – 7 inches water<br>AA-006: 2- 7 inches water<br>AA-007: 2 – 10 inches water<br>AA-008: 2 – 7 inches water<br>AA-009: 2 – 7 inches water<br>AA-010: 2 – 7 inches water<br>AA-012: 2 – 7 inches water<br>AA-013: 2 – 7 inches water<br>AA-014: 2 – 7 inches water<br>AA-015: 2 – 7 inches water<br>AA-018: 2 – 7 inches water<br>AA-021: 3 – 8 inches water<br>AA-022: 2 – 7 inches water<br>AA-023: 2 – 7 inches water<br>AA-024: 2 – 7 inches water | Visible emissions: < 7%   |
| <b>Data Collection Frequency</b>        | Measure pressure drop on a daily basis.  | Measure visible emissions on a weekly basis.  |
| <b>Averaging Period</b>                 | All baghouse pressure drop readings will be assumed to be representative of the preceding 24-hour period.  | Averaging per EPA Method 9  |
| <b>Recordkeeping</b>                    | Pressure drop records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years.  | Copies of visible emissions observations will be kept at the facility for a period of five (5) years.         |
| <b>QA/QC</b>                            | Monthly maintenance inspections and annual pressure drop gauge calibration.  | Opacity observer trained and certified per EPA Method 9 and maintain monthly inspections.                     |

The table below is the CAM Plan for Emission Point AA-011:

|  | <b>INDICATOR NO. 1</b>   | <b>INDICATOR NO. 2</b>  |
|--|--|---|
| <b>Indicator</b>                       | Pressure Drop  | Scrubber Water Flow Rate  |
| <b>Measurement Approach</b>            | Pressure drop is measured using a differential pressure gauge  | Scrubber water flow rate is measured using a flow meter.  |
| <b>Monitoring Methods and Location</b> | Continuously monitor the pressure drop across the scrubber   | Scrubber water flow rate will be continuously monitored (per NSPS).   |
| <b>Indicator Range</b>                 | Pressure drop across scrubber is greater than 8.0 inches of water<br><br>Pressure drop compliance values to be re-assessed and adjusted if necessary at each subsequent permit required stack test for PM for this source. | +/- 20% of observed water flow rate during most recent passing test (per NSPS).   |
| <b>Data Collection Frequency</b>       | Pressure drop measured continuously  | Measure water flow rate to the scrubber on a continuous basis.  |
| <b>Averaging Period</b>                | 2 hour average for pressure drop (per NSPS)  | 2-hour average for water flow rate to the scrubber (per NSPS).  |
| <b>Recordkeeping</b>                   | Records of pressure drop will be kept at the facility for a period of five (5) years.  | Water flow rate records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years. |
| <b>QA/QC</b>                           | Monthly maintenance inspections and annual pressure drop gauge calibration   | Monthly maintenance inspections and annual flow meter calibration.  |

The table below is the CAM Plan for Emission Points AA-016 and AA-017:

|  | <b>INDICATOR NO. 1</b>  | <b>INDICATOR NO. 2</b>  |
|--|---|---|
| <b>Indicator</b>                       | Pressure Drop   | Scrubber Water Flow Rate  |
| <b>Measurement Approach</b>            | Pressure drop is measured using a differential pressure gauge   | Scrubber water flow rate is measured using a flow meter.  |
| <b>Monitoring Methods and Location</b> | Continuously monitor the pressure drop across the scrubber  | Scrubber water flow rate will be continuously monitored (per NSPS).   |
| <b>Indicator Range</b>                 | Pressure drop across scrubber is greater than 2.43 inches of water<br><br>Pressure drop compliance values to be re-assessed and adjusted if necessary at each subsequent permit required stack test for PM for this source. | +/- 20% of observed water flow rate during most recent passing test (per NSPS).   |
| <b>Data Collection Frequency</b>       | Pressure drop measured continuously   | Measure water flow rate to the scrubber on a continuous basis.  |
| <b>Averaging Period</b>                | 2 hour average for pressure drop (per NSPS)   | 2-hour average for water flow rate to the scrubber (per NSPS).  |
| <b>Recordkeeping</b>                   | Records of pressure drop will be kept at the facility for a period of five (5) years.   | Water flow rate records and copies of all inspections and calibrations will be kept at the facility for a period of five (5) years. |
| <b>QA/QC</b>                           | Monthly maintenance inspections and annual pressure drop gauge calibration  | Monthly maintenance inspections and annual flow meter calibration.  |