

**STATE OF MISSISSIPPI  
AND FEDERALLY ENFORCEABLE  
AIR POLLUTION CONTROL  
PERMIT**

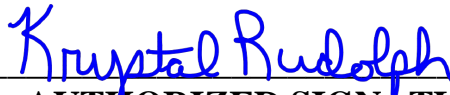
**TO OPERATE AIR EMISSIONS EQUIPMENT AT A  
SYNTHETIC MINOR SOURCE**

**THIS CERTIFIES THAT**

USA Yeast Company LLC  
457 JM Tatum Industrial Drive  
Hattiesburg, Mississippi  
Forrest County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Issued:** August 24, 2023

**Permit No.:** 0800-00099

**Effective Date:** As specified herein.

**Expires:** July 31, 2028

## SECTION 1.

### A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)
3. Any activities not identified in the application are not authorized by this permit.  
  
(Ref.: Miss. Code Ann. 49-17-29 1.b)
4. 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 constructing or operating without a valid permit.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
5. 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).)
6. 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 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).)
7. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.  
  
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
8. The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials:

- a. To enter 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. At reasonable times 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 emission.

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

9. 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)

10. 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. 2.1.D(7).)

11. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any 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 Part 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).)

**B. GENERAL OPERATIONAL CONDITIONS**

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. Any diversion from or bypass of collection and control facilities is prohibited, except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

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

3. Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

(Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

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

- a. Upsets

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

established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

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

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

5. 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).)

**C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION**

1. For renewal of this permit, the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the

source's ability to operate unless a timely and complete renewal application has been submitted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the 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).)

3. 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).)

4. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to:
  - a. Persistent violation of any 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.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

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

## SECTION 2. EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Facility Reference	Description
AA-001	B1	16.76 MMBtu/hr Boiler Natural gas-fired
AA-002	B2	16.76 MMBtu/hr Boiler Natural gas-fired
AA-003	F1	Seed, Semi-seed, and Commercial Yeast Fermenter Monitored by Continuous Emissions Monitoring System (CEMS)
AA-004	F2	Semi-seed and Commercial Yeast Fermenter Monitored by CEMS
AA-005	F3	Commercial Yeast Fermenter Monitored by CEMS
AA-006	F4	Commercial Yeast Fermenter Monitored by CEMS
AA-007	B3	5.02 MMBtu/hr Boiler Natural gas-fired
AA-008	B4	5.02 MMBtu/hr Boiler Natural gas-fired
AA-009	T1	33,000 gallon Aqueous Ammonia Storage Tank
AA-010	T2	7,100 gallon Phosphoric Acid Storage Tank



### SECTION 3. EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.1	Smoke	Opacity shall not exceed 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.2		
	11 Miss. Admin. Code Pt. 2, R. 1.3.C.	3.3	Dust Fumes Gases	Good Air Pollution Control Practices
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM (Filterable Only)	$E = 4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). Title V Operating Permit (TVOP) and Maximum Achievable Control Technology (MACT) Avoidance Limitation	3.5	Throughput	Yeast Production shall not exceed 54,000 tons per year.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). TVOP and MACT Avoidance Limitation	3.6	Individual HAP	9.75 tons per year.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). TVOP and MACT Avoidance Limitation	3.7	Total HAP	24.0 tons per year.
AA-001 AA-002 AA-007 AA-008	11 Miss. Admin. Code Pt. 2, R. 1.4. A(1).	3.8	SO <sub>2</sub>	Emissions shall not exceed 4.8 lbs/MMBtu.
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(b).	3.9	PM (Filterable Only)	Emissions shall not exceed $E = 0.8808 * I^{-0.1667}$ .
	40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.40c(a), Subpart Dc	3.10	SO <sub>2</sub> PM	Applicability
AA-003 AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11	VOC Individual HAP Total HAP	Good Air Pollution Control Practices
AA-007 AA-008	11 Miss. Admin. Code Pt. 2, R. 1.3. D(1)(a).	3.12	PM (Filterable Only)	Emissions shall not exceed 0.6 lbs/MMBtu.

3.1 For the entire facility, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial,

commercial or waste disposal process which exceeds 40 percent opacity subject to the exceptions provided in (a) and (b).

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

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

- 3.2 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40 percent 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 the entire facility, 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.

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.

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.)

- 3.4 For the entire facility, except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship

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

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

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

- 3.5 For the entire facility, the permittee shall limit total annual yeast production to 54,000 tons per year (tpy), as determined on a monthly basis and for each consecutive 12-month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). [TVOP and MACT Avoidance Limitation])

- 3.6 For the entire facility, the permittee shall limit individual Hazardous Air Pollutant (HAP) emissions to 9.75 tpy. The permittee shall determine individual HAP emissions on a monthly basis and for each consecutive 12-month period on a rolling basis. The permittee shall calculate individual HAP emissions using, but not limited to, manufacturer's specifications, engineering calculations, production, CEMS, and performance testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). [TVOP and MACT Avoidance Limitation])

3.7 For the entire facility, the permittee shall limit total HAP emissions to 24.0 tpy. The permittee shall determine total HAP emissions on a monthly basis and for each consecutive 12-month period on a rolling basis. The permittee shall calculate total HAP emissions using, but not limited to, manufacturer's specifications, engineering calculations, production, CEMS, and performance testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). [TVOP and MACT Avoidance Limitation])

3.8 For Emission Points AA-001, AA-002, AA-007, and AA-008, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

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

3.9 For Emission Points AA-001 and AA-002, the maximum permissible emission of ash and/or particulate matter for fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour.

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

3.10 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and General Provisions (40 CFR 60, Subpart A).

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

3.11 For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee, at all times, shall operate and maintain the fermenters, including associated air pollution

control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether the fermenters are operating in compliance with operation and maintenance requirements will be based on information available to the DEQ 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 fermenters.

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

- 3.12 For Emission Points AA-007 and AA-008, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

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

**SECTION 4.  
WORK PRACTICES**

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

## SECTION 5. MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
	11 Miss. Admin. Code Pt. 2, R. 2.2. B(11).	5.2	Throughput	Monitor and Record Yeast Production
		5.3	Individual HAP	Monitor and Record Individual HAP emissions.
		5.4	Total HAP	Monitor and Record Total HAP emissions.
AA-001 AA-002	40 CFR 60.48c(g), Subpart Dc	5.5	Fuel Usage	Monitor and Record Fuel Combusted.
AA-003 AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2. B(11).	5.6	VOC	Operate, Maintain, and Calibrate CEMS
		5.7	CEMS	Collect Data While Fermenting. Record Inspections, Calibration , and Validation Checks.
		5.8		Monitor Calibration Drifts
		5.9	VOC	Monitor Fermenter Exhaust
		5.10		Determine Average VOC Concentration
		5.11		Conditional Performance Test
		5.12	Individual HAP Total HAP	Biennial Performance Test

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 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 MDEQ 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 the entire facility, the permittee shall demonstrate compliance with Condition 3.5 by monitoring and recording yeast production, as determined on a monthly basis and for each consecutive 12-month period on a rolling basis.

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

5.3 For the entire facility, the permittee shall monitor and record individual HAP emissions, as determined on a monthly basis and for each consecutive 12-month period on a rolling basis. The permittee shall calculate individual HAP emissions using, but not limited to, manufacturer's specifications, engineering calculations, production, CEMS data, and most recent performance test results.

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

5.4 For the entire facility, the permittee shall monitor and record total HAP emissions in tpy, as determined on a monthly basis and for each consecutive 12-month period on a rolling basis. The permittee shall calculate total HAP emissions using, but not limited to, manufacturer's specifications, engineering calculations, production, CEMS data, and most recent performance test results.

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

5.5 For Emission Points AA-001 and AA-002, the permittee shall monitor and record the amount of fuel combusted during each month.

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



5.6 For Emission Points AA-003, AA-004, AA-005, AA-006, the permittee shall operate, maintain, and calibrate a CEMS that generates a single combined response value for VOC concentration (VOC CEMS) according to the procedures and requirements in Performance Specification 8 - Performance Specifications for Volatile Organic Compound Continuous Emission Monitoring Systems in Stationary Sources in Appendix B to 40 CFR 60.

The permittee shall operate and maintain the VOC CEMS according to the procedures and requirements in Procedure 1 - Quality Assurance Requirements for Gas Continuous Emission Monitoring Systems Used for Compliance Determination in Appendix F to 40 CFR 60. The permittee shall perform Relative Accuracy Test Audits (RATA), Cylinder Gas Audits (CGA), and Relative Accuracy Audits (RAA) according to the following frequencies:

- (a) Conduct a RATA at least once every 12 calendar quarters, in accordance with sections 8 and 11, as applicable, of Performance Specification 8.
- (b) The permittee shall conduct a CGA or RAA in the calendar quarters during which a RATA is not conducted, but in no more than 11 quarters in succession.
- (c) As necessary, rather than relying on citation 2 of Procedure 1 of Appendix F to 40 CFR 60, the permittee shall rely on EPA/600/R-12/531.
- (d) The CEMS shall meet the criteria of Performance Specification 8, Section 13.2.

The permittee shall use Method 25A in appendix A-7 to 40 CFR 60 as the Reference Method.

The permittee shall calibrate the VOC CEMS with propane. The permittee shall set the VOC CEMS span at less than 5 times the VOC concentration equivalent to the Title V major source threshold. Note that the EPA considers 1.5 to 2.5 times the relevant VOC emission limitation to be the optimum range, in general.

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

5.7 For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee shall check the zero (low-level) and high-level calibration drifts for each CEMS in accordance with

the applicable Performance Specification of 40 CFR 60, Appendix B. The permittee shall adjust the zero (low-level) and high-level calibration drifts, at a minimum, whenever the zero (low-level) drift exceeds 2 times the limits of the applicable Performance Specification. The permittee shall perform the calibration drift checks at least once daily except under the following conditions:

- (a) If a 24-hour calibration drift check for a CEMS is performed immediately prior to, or at the start of, a batch monitoring period of a duration exceeding 24 hours, then the permittee is not required to perform 24-hour-interval calibration drift checks during that batch monitoring period.
- (b) If the 24-hour calibration drift exceeds 2.5 percent of the span value in fewer than 5 percent of the checks over a 1-month period, and the 24-hour calibration drift never exceeds 7.5 percent of the span value, then the permittee may reduce the frequency of calibration drift checks to at least weekly (once every 7 days).
- (c) If, during two consecutive weekly checks, the weekly calibration drift exceeds 5 percent of the span value, then the permittee shall resume a frequency of at least 24-hour interval calibration checks until the 24-hour calibration checks meet the test of paragraph (b) of this condition.

For each CEMS, the permittee shall record the results of each inspection, calibration, and validation check.

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

- 5.8 For Emission Points AA-003, AA-004, AA-005, and AA-006, except for periods of monitoring system malfunctions, required monitoring system quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), and any scheduled maintenance, the permittee shall collect data using the CEMS, at all times during each batch monitoring period.

The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or quality control activities in data averages and calculations used to report emission or operating levels, or to fulfill a data collection

requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control system.

Any hour during the batch monitoring period for which quality-assured VOC CEMS data, are not obtained is a deviation from monitoring requirements and is counted as an hour of monitoring system downtime.

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

- 5.9 For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee shall continuously monitor and record the average VOC concentration in the fermenter exhaust for each batch of each fermentation stage. The permittee shall calculate individual HAP emissions using the average VOC concentration and the individual HAP/VOC ratio determined by Condition 5.12.

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

- 5.10 For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee shall keep the following records:

- (a) Records described in 40 CFR 63.10(b)(2)(vi), (vii), (x), and (xi), Subpart A. The CEMS shall allow the amount of excess zero (low-level) and high-level calibration drift measured at the interval checks to be quantified and recorded.
- (b) Records described in 40 CFR 63.10(c)(1) through (6), Subpart A.
- (c) Records of the quality control program as specified in 40 CFR 63.8(d), Subpart A, including the program of corrective action; the current version of the performance evaluation test plan, as specified in 40 CFR 63.8(e)(3), Subpart A; and previous (*i.e.*, superseded) versions of the performance evaluation test plan for a period of 5 years after each revision to the plan.
- (d) Requests for alternatives to RATA for CEMS as required in 40 CFR 63.8(f)(6)(i), Subpart A.
- (e) Records of each deviation from monitoring requirements, including a description of the time period during which the deviation occurred, the nature and cause of

the deviation, the corrective action taken or preventive measures adopted, and the nature of repairs or adjustments to the monitoring system.

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

- 5.11 For Emission Points AA-003, AA-004, AA-005, and AA-006, in the event that the CEMS malfunctions or becomes non-operational so that monitoring data for VOC emissions cannot be collected, the permittee shall conduct performance testing in accordance with Method 25A of Appendix A-7 to 40 CFR 60 once every thirty (30) days until such time that the CEMS is again performing to the manufacturer's design and the requirements specified herein. The failure of the CEMS is to be determined by the DEQ so that the permittee shall expediently and readily develop a means of correcting the systems for collecting and measuring VOC emissions in a timely manner

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

- 5.12 For Emission Points AA-003, AA-004, AA-005, and AA-006, the permittee shall demonstrate compliance with individual HAP and total HAP emission limitations by conducting biennial performance tests in accordance with EPA Reference Method 18, or an EPA approved equivalent, not to exceed 25 months from the previous performance tests. The permittee shall use the results of the most recent stack test to determine individual and total HAP emissions in parts per million (ppm) and pound per hour (lb/hr) increments.

(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
Facility-Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
		6.2	Submit certified annual monitoring report.
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official.
		6.4	Individual and Total HAP Emissions
			Yeast Production
			VOC/Individual HAP Ratio
6.5	Annual Excess Emissions Report		
AA-001 AA-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Fuel Combustion Report
AA-003 AA-004 AA-005 AA-006	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	RATA Report
		6.8	CEMS Malfunction Report
		6.9	Performance Test Notification and Report Submittal

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

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

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. 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.

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

6.3 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).)

6.4 For the entire facility, the permittee shall submit annual reports, in accordance with Condition 6.2, containing the following:

- (a) Yeast production, in tons, as determined on a monthly basis and for each consecutive 12-month period on a rolling basis.
- (b) Individual and total HAP emissions, in tons, on a monthly basis and for each consecutive 12-month period on a rolling basis.
- (c) The average VOC concentration determined in Condition 5.9.
- (d) Individual HAP/VOC ratio used to calculate individual HAP emissions.

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

6.5 For the entire facility, the permittee shall submit annual excess emissions reports, in accordance with Condition 6.2, containing information in 40 CFR 60.7(d), Subpart A and the following:

- (a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), Subpart A, any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
- (b) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
- (c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
- (d) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

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

6.6 For Emission Points AA-001 and AA-002, the permittee shall submit annual fuel combustion reports, in accordance with Condition 6.2. The report shall contain the type and amount of fuel combusted each month.

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

6.7 For Emission Points AA-003, AA-004, AA-005, AA-006, the permittee shall submit the results of each RATA required by Condition 5.6 no later than sixty (60) days after completion of the audit.

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

6.8 For Emission Points AA-003, AA-004, AA-005, AA-006, the permittee shall notify the DEQ in writing of events where the CEMS is malfunctioning or becomes non-operational so that monitoring data for HAP emissions cannot be collected no later than ten (10) days after the initial discovery of the failure.

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

6.9 For Emission Points AA-003, AA-004, AA-005, AA-006, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

After the first successful submittal of an initial 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 subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.

The permittee shall submit written test reports of the results of the individual HAP and total HAP performance tests within sixty (60) days of the actual date the test is performed.

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