STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

South Mississippi Electric Power Association, R D Morrow Plant
304 Old Okahola Schoolhouse Road
Lamar, County

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

Permit Issued: June 22, 2011

Permit Modified: SEP 16 2014

Effective Date: **As specified herein.**

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: May 31, 2016 **Permit No.: 1440-00021**

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 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).)

1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

1.6 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).)

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

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

calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) 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).)

(c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

(d) 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.)

1.8 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).)

1.9 Any document required by this permit to be submitted to the DEQ shall contain a

certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

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

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

1.11 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).)

1.12 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).)

1.13 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).)

1.14 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).)

1.15 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.)

1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

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

(a) the changes are not modifications under any provision of Title I of the Act;

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in

accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

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

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; 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 51.166;

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

(f) any change in ownership of the stationary source."

1.20 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).)

1.21 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).)

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

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private 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.)

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

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions

specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

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

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

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

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

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

(1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(i) an upset occurred and that the permittee can identify the cause(s) of the upset;

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

(iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

(iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and

(v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.

(2) In any enforcement proceeding, the permittee 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.

(b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.HH. & R. 1.2.CC.)

(1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:

(i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;

(ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or

(iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.

(2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.

(3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

(1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

(i) the permittee can identify the need for the maintenance;

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

(iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

(iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and

(v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.

(2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.

(3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	Coal/No.2 Fuel Oil Fired Unit No. 1 Boiler (Maximum Rated Capacity 2,675 MMBtu/hr) equipped with a Flue Gas Desulfurization Scrubber and an Electrostatic Precipitator
AA-002	Coal/No.2 Fuel Oil Fired Unit No. 2 Boiler (Maximum Rated Capacity 2,675 MMBtu/hr) equipped with a Flue Gas Desulfurization Scrubber and an Electrostatic Precipitator.
AA-003	Coal Handling System including conveyors and storage piles
AA-004	1.75 MMBTU/Hr (250 HP) Compression Ignition Emergency Stationary Fire Pump Diesel Engine (constructed 1997)
AA-005	3.5 MMBTU/Hr (500 HP) Compression Ignition Emergency Stationary Cummins Diesel Engine Generator (constructed 1976)
AA-006	7,200 Kgal/hr Cooling Tower A
AA-007	7,200 Kgal/hr Cooling Tower B
AA-008	Gravel Roads
AA-009	Coal Pile (Excluding coal pile and conveyors)
AA-010	Limestone Handling including the New Limestone Ball Mill System and the Replacement Limestone Storage Silos
AA-011	4.1 MMBTU/Hr (587 HP) Compression Ignition Emergency Stationary Caterpillar Diesel Engine Generator (Manufactured 12/23/2005 – Displacement 15.2 liters/cylinder)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

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

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-001, AA-002	40 CFR Part 60, Subpart D (Section 60.42 (a)(1))	3.B.1	PM	0.1 lb/MMBtu
	40 CFR Part 60, Subpart D (Section 60.43(a)(2))	3.B.2, 3.B.5	SO_2	1.2 lb/MMBtu when burning coal
	40 CFR Part 60, Subpart D (Section 60.44 (a)(3))	3.B.3, 3.B.5	NOx	0.7 lb/MMBtu when burning coal
	40 CFR Part 60, Subpart D (Section 60.42 (a)(2))	3.B.4	Opacity	$\leq$ 20 % except for one 6-minute period per hour of not more than 27%
	Clean Air Interstate Rule (CAIR) 40 CFR Part 96	3.B.6	SO_2, NOx	CAIR Requirements
	MATs Rule 40 CFR 63, Subpart UUUUU	3.B.12	PM, SO2, HG	Applicability
AA-003 AA-010	11 Miss. Admin. Code Pt.2, R.1.3. F(1)	3.B.7	PM	$E=4.1(p)^{0.67}$
AA-004, AA-005, AA-011	11 Miss. Admin. Code PT.2, R. 1.3. D(1)(a)	3.B.8	PM	0.6 lbs/MMBtu
	11 Miss. Admin. Code Pt.2, R. 1.4.A(1)	3.B.9	SO_2	4.8 lbs/MMBtu
	NESHAP Subpart ZZZZ, 40 CFR 63.6602, and Table 2c of Subpart ZZZZ Beginning May 3, 2013	3.B.10	HAP	Operating/Maintenance Requirements
AA-010 (Ball Mill Only	40 CFR Part 60, Subpart OOO (**Section** 60.672 (b) of Table 3)	3.B.11	Opacity	$\leq$7 %

3.B.1 For Emission Points AA-001 and AA-002, the permittee shall not emit any gases that contain particulate matter in excess of 0.1 lb/MMBTU of fuel burned. (Ref.: 40 CFR Section 60.42 (a)(1))

3.B.2 For Emission Points AA-001 and AA-002, the permittee shall not emit any gases that contain sulfur dioxide in excess of 1.2 lb/MMBTU of fuel burned. (Ref.: 40 CFR Section 60.43 (a)(2))

3.B.3 For Emission Points AA-001 and AA-002, the permittee shall not emit any gases that contain nitrogen oxides in excess of 0.70 lb/MMBTU of fuel burned. (Ref.: 40 CFR Section 60.44 (a)(3))

3.B.4 For Emission Points AA-001 and AA-002, the permittee shall not emit any gases that have opacity greater than twenty percent (20%), except for one six-minute period per hour of not more than twenty seven percent (27%) opacity. (Ref.: 40 CFR Section 60.42 (a)(2))

3.B.5 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with all applicable requirements of the Acid Rain Program Regulations as specified in 40 CFR Parts 72-78. (Ref.: Acid Rain Regulations, 40 CFR Part 72-78)

3.B.6 For Emission Points AA-001 and AA-002, the permittee is subject to the requirements of APC-S-1, Section 14.1 and the Clean Air Interstate Rule (CAIR) as set forth in 40 CFR 51.123, 40 CFR 51.124, 40 CFR 96.102 through 40 CFR 96.388.

(a) Regarding the ***CAIR NO_x Annual Trading Program***, the permittee must comply with all of the standard requirements specified in §96.106 and permit requirements specified in §96.120 through §96.124. The permittee shall also comply with all monitoring and reporting requirements as specified in §96.170 through §96.175.

(b) Regarding the ***CAIR SO_2 Annual Trading Program***, the permittee must comply with all of the standard requirements specified in §96.206 and permit requirements specified in §96.220 through §96.224. The permittee shall also comply with all monitoring and reporting requirements as specified in §96.270 through §96.275.

(c) Regarding the ***CAIR NO_x Ozone Season Trading Program***, the permittee must comply with all of the standard requirements specified in §96.306 and permit requirements specified in §96.320 through §96.324. The permittee shall also comply with all monitoring and reporting requirements specified in §96.370 through §96.375.

3.B.7 For Emissions Point AA-003 and AA-010, except as otherwise specified or limited herein, the permittee shall not cause, permit or allow the emissions from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F(1))

3.B.8 For Emission Points AA-004, AA-005 and AA-011, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(a))

3.B.9 For Emission Point AA-004, AA-005 and AA-011, 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.B.10 Emission Points AA-004, AA-005, and AA-011 are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. Emission Points AA-004, AA-005, and AA-011 are existing compression ignition (CI) emergency stationary RICE with individual site ratings greater than 500 brake HP and therefore, beginning on May 3, 2013, must comply with the following requirements except during periods of startup:

1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

The permittee may choose to utilize an oil analysis program as outlined in Condition 5.B.5(c) of this permit in order to extend the specified oil change requirement in (a) above. The permittee may also petition the MDEQ for use of an alternative work practice to (c) above and/or to the operational requirements for startup. (Ref.: 40 CFR §63.6602, and Table 2c of Subpart ZZZZ)

3.B.11 For Emission Point AA-010, the new limestone ball mill, within 60 days after the unit achieves maximum production rate at which the new ball mill will be operated, but not later than 180 days after initial startup, the permittee shall not emit any gases that have opacity greater than seven percent (7%). (Ref.: 40 CFR Section §60.672(b) and Table 3 to Subpart OOO)

3.B.12 Beginning April 16, 2016, Emission Points AA-001 and AA-002 are subject to and shall comply with the applicable requirement of 40 CFR 63, Subpart UUUUU – NESHAP from Coal- and Oil-Fired Electric Utility Steam Generating Units, according to the provisions of Section 4 of this permit. (Ref.: 40 CFR 63, Subpart UUUUU)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D (1) (a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A (1)	3.C.2	SO_2	4.8 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R.1.3 F(1)	3.C.3	PM	$E=4.1(p)^{0.67}$

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D (1) (a))

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4. A (1))

3.C.3 Except as otherwise specified or limited herein, the permittee shall not cause, permit or allow the emissions from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour. (Ref.: 11 Miss. Admin. Code Pt. 2, R.1.3 F (1))

There are no other requirements applicable to the insignificant activities listed in the source's Title V permit application.

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

4.3 For Emission Points AA-001 and AA-002, the permittee is subject to and shall comply with all the applicable requirements of 40 CFR 63, Subpart UUUUU – NESHAP from Coal- and Oil- Fired Electric Utility Steam Generating Units. The permittee shall comply with the requirement of Subpart UUUUU as specified in Section 3.B of this permit as expeditiously as practicable, but no later than April 16, 2016, as allowed by the 1 year compliance extension granted on May 9, 2013 and attached as Appendix E. (Ref.: 40 CFR 63, Subpart UUUUU)

4.4 For Emission Point AA-001 and AA-002, the permittee shall submit a compliance plan to the MDEQ no later than October 16, 2015, to be attached as Appendix F of the permit per the modification procedures outlined in 11 Miss. Admin. Code Pt. 2, Ch. 6. The plan shall address in detail all methods and procedures to be used by the permittee to comply with the NESHAP from Coal- and Oil-Fired Electric Utility Steam Generating Units. At a minimum, the plan shall include all applicable emission limitations, work practice standards, and operating limits (§63.9991 and/or §63.10009); testing (§63.10005 through §63.10008 and §63.10011); monitoring (§63.10010 and §63.10020 through §63.10023); recordkeeping (§63.10032) and reporting requirements (§63.10031) contained in the NESHAP. Any request to use an alternative method (when allowed under the part), shall be submitted to the MDEQ for approval before including the alternative in the plan. Any request for an alternative to this standard not delegated to the MDEQ must be approved by the EPA (Ref.: 40 CFR 63, Subpart UUUUU)

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.

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

(a) the date, place as defined in the permit, and time of sampling or measurements;

(b) the date(s) analyses were performed;

(c) the company or entity that performed the analyses;

(d) the analytical techniques or methods used;

(e) the results of such analyses; and

(f) the operating conditions existing at the time of sampling or measurement. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

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

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

B. Specific Monitoring and Recordkeeping Requirements

5.B.1 For Emission Points AA-001 and AA-002, the permittee shall comply with the monitoring and testing requirements specified in 40 CFR part 60, Subpart D, Sections 60.45 and 60.46 (Ref.: 40 CFR Part 60, Subpart D, Sections 60.45 and 60.46)

5.B.2 For Emission Points AA-001 and AA-002, the permittee shall calibrate, maintain and operate continuous monitoring systems (e.g, COMs, CEMs) for the purpose of measuring opacity, sulfur dioxide emissions, nitrogen oxide emissions, and carbon dioxide, unless complying with another standard or requirement meets the requirements of this standard. (Ref.: 40 CFR Part 60, Subpart D, Section 60.45)

5.B.3 For Emission Points AA-001 and AA-002, the permittee shall demonstrate compliance with particulate matter emission limitations by stack testing in accordance with EPA Reference Methods 1-5 or their approved equivalents and submittal of a stack test report once during the term of this permit.

A pretest conference at least thirty (30) days prior to the scheduled test date is needed to ensure that all test methods and procedures are acceptable to the Office of Pollution Control. Also, the Office of Pollution Control must be notified prior to the scheduled test date. At least ten (10) days notice should be given so that an observer may be scheduled to witness the test(s). (Ref.: 11 Miss. Admin. Code Pt.2, R.6.3.A(3))

5.B.4 For Emission Points AA-001 and AA-002, the permittee shall monitor and record emissions (e.g., CEMS) in accordance with 40 CFR Part 75. The permittee shall maintain a file on site of all measurements, data, reports, and other information required in 40 CFR Part 75.54 for each affected unit for a period of five (5) years. This information should include the hourly operating parameters, sulfur dioxide emissions, nitrogen oxide emissions, carbon dioxide emissions, flue gas flow rates, and opacity readings for each affected unit. (Ref.: 40 CFR Part 75.54)

5.B.5 For Emission Points AA-001 and AA-002, the permittee shall conduct compliance assurance monitoring (CAM) for control of Particulate Matter in accordance with the CAM plan found in Appendix D and the following monitoring approach:

I. Indicator	Opacity of ESP exhaust.
Measurement Approach	COMS in ESP exhaust.
II. Indicator Range	Establish the upper limit indicator opacity at or below 20% to demonstrate a sufficient margin of compliance with the PM limit.
III. Performance Criteria A. Data Representativeness	Continue to operate the existing COMS at a representative location in the ESP exhaust per 40 CFR 60, Appendix B, Performance Specification 1 (PS-1) [note that the revised version of PS-1 applies only to new or relocated opacity monitors].
B. Verification of Operational Status	Results of initial COMS performance evaluation conducted per PS-1.
C. QA/QC Practices/Criteria	Operate and evaluate the existing COMS per PS-1. Check the zero and span drift daily and perform a quarterly filter audit.
D. Monitoring Frequency	Monitor the opacity of the ESP exhaust continuously.
E. Data Collection Procedures	Set up the data acquisition system (DAS) to retain all 1-minute and 6-minute and hourly average opacity data.
F. Averaging period	Use the 1-minute opacity data to calculate 6-minute averages. An excursion occurs when the one hour opacity average exceeds the upper opacity limit defined for limiting the PM emission rate below 0.1 lb/mmbtu.

The permittee shall also comply with the applicable CAM requirements set forth in 40 CFR Part 64. Specifically, the permittee shall conduct required monitoring and recordkeeping in accordance with 64.7 through 64.9. (Ref.: 40 CFR Part 64)

5.B.6 Beginning May 3, 2013, for Emission Points AA-004, AA-005, and AA-011, the permittee shall comply with the following monitoring, operating and maintenance requirements:

(a) Operate and maintain the stationary RICE in accordance with the manufacturer's emission-related written instruction or must develop a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions;

(b) The permittee must install a non-resettable hour meter, if not already installed;

(c) The permittee may utilize an oil analysis program in order to extend the specified oil change requirement from Condition 3.B.8(a) provided the analysis analyzes the parameters identified in 63.6625(i).

(Ref.: 40 CFR 63.6625(e), (f), and (i))

5.B.7 Beginning May 3, 2013, for Emission Points AA-004, AA-005, and AA-011, the permittee shall operate the engine according to the following:

(a) Any operation other than emergency operation, maintenance, testing and/or operation in non-emergency situations not exceeding 50 hours per year is prohibited;

(b) There is no operating limit on the use of the engine during an emergency situation;

(c) The engine may be operated for the purpose of maintenance checks and readiness testing in accordance with vendor, manufacturer, State or Federal recommendations. Such testing is limited to 100 hours per year.

(d) The engine may be operated up to 50 hours per year in non-emergency situations; however, those 50 hours count towards the 100 hour limit in (c) above. The 50 hours per year for non-emergency operation can not be used to cover the power usage provisions outlined in 63.6640(f)(4).

(Ref.: 40 CFR 63.6640(f)(1) through (4))

5.B.8 Beginning May 3, 2013, for Emission Points AA-004, AA-005, and AA-011, the permittee shall maintain the following records and keep each record readily accessible for at least five years after the date of each occurrence:

a) All maintenance records that demonstrate the engine was operated and maintained in accordance with the maintenance plan identified in 5.B.5(a);

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

(Ref.: 40 CFR 63.6655(e) and (f) and 63.6660 (b) and (c))

5.B.9 For the new ball mill associated with Emission Point AA-010, the permittee shall determine opacity utilizing Method 9 of Appendix A–4 of 40 CFR Part 60 and the procedures in 40 CFR Part 60, Section 60.11, with the following additions:

(a) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).

(b) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.

(Ref.: 40 CFR Part 60, Subpart OOO, Section 60.6759c)(a)(i-ii))

5.B.10 For the new ball mill, Emission Point AA-010, the permittee shall repeat the performance test in accordance with 40 CFR Part 60.11 and 40 CFR Part 60, Subpart OOO, Section 60.675 within 5 years from the previous performance test for fugitive emissions from effected units without water sprays. (Ref.: 40 CFR Part 60, Subpart OOO, Table 3 – Fugitive Emissions Limits)

5.B.11 For the new ball mill associated with Emission Point AA-010, the duration of the Method 9 observations conducted must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Table 3 of 40 CFR 60 Subpart OOO must be based on the average of the five 6-minute averages. (Ref.: 40 CFR Part 60, Section 60.675(c)(3))

5.B.12 For the replacement silos associated with Emission Point AA-010, the permittee shall comply with the reporting and recordkeeping requirements as specified in 40 CFR Part 60, Section 60.676 (a)(4). (Ref.: 40 CFR Part 60, Section 60.670(d)(2))

C. Specific Reporting Requirements

5.C.1 For Emission Points AA-001 and AA-002, the permittee shall submit an excess emissions and monitoring systems performance report and/or a summary report for nitrogen oxides and sulfur dioxides (including calculations of emissions in lb/MMBTU) using CEMs data and Opacity using COMs data generated to comply with condition 5.B.1 of this permit. These reports shall be submitted to MDEQ on a semiannual basis, as described in condition 5.A.4 of this permit. All reports should be submitted in accordance with the terms outlined in 40 CFR Part 60.7(c). (Ref.: 40 CFR Part 64)

5.C.2 For Emission Points AA-001 and AA-002, the permittee shall submit compliance assurance monitoring (CAM) reports as specified in 40 CFR 64.9. (Ref.: 40 CFR Part 64)

5.C.3 Beginning May 3, 2013, for Emission Points AA-004, AA-005, and AA-011, the permittee shall submit a semiannual compliance report in accordance with the applicable requirements in 63.66560 and Table 7 of Subpart ZZZZ. (Ref.: 40 CFR 63.6650)

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://ecfr.gpoaccess.gov** under Title 40, or DEQ shall provide a copy upon request from the permittee.

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons

selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II 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.

SECTION 8. ACID RAIN

8.1 The permittee shall comply with all requirements of the Phase II Acid Rain Permit attached as Appendix C of this permit. All conditions of the Phase II Acid Rain Permit are effective from June 22, 2011 through May 31, 2016; however these conditions may be revised by the MDEQ during the permitted period

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
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B
List of Regulations Referenced in this Permit

List of Regulations Referenced in this Permit

11 Miss. Admin. Code Pt.2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6,	Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Air Emissions Operating Permit Regulations for the Purpose of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
Title VI of the Clean Air Act	Stratospheric Ozone Protection
40 CFR Part 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is commenced after August 17, 1971
40 CFR Part 60, Subpart A	Standards of Performance for New Stationary Source General Provisions Notification and Recordkeeping
40 CFR Part 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
40 CFR Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 62, Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-fired Electric Utility Steam Generating Units

The full text of the regulations referenced in this permit may be found on-line at http://www.deq.state.us.us and http://ecfr.gpoaccess.gov, or the Mississippi Department of Environmental Quality (MDEQ) will provide a copy upon request.

APPENDIX C

Acid Rain Permit

ACID RAIN PERMIT

Issued to:	R.D. Morrow, Sr. Generating Plant
Operated by:	South MS Electric Power Association
ORIS Code:	06061
Effective:	**June 22, 2011** through **May 31, 2016**

Summary of Previous Actions:

This page will be replaced to document new actions each time a new action is taken by the DEQ. This is the initial permitting action being undertaken:

1.	Final Permit Issued.	October 1, 1997
2.	Revised permit sent for public comment.	November 6, 1998
3.	Modified permit finalized and issued.	December 29, 1998
4.	Draft permit for public comment for permit renewal.	July 2, 2004
5.	Draft permit for EPA Review for permit renewal.	August 3, 2004
6.	First Renewal permit finalized and issued.	September 24, 2004
7.	Second Renewal Permit sent for public/EPA comment	April 15, 2011
8.	Second Renewal Permit finalized and issued	June 22, 2011
9.	Modification to Title V Permit sent to public notice/EPA review	April 11, 2014

Present Action:

1. Final Permit Modified

Signature 9-16-2014 **Date**

Harry M. Wilson, P.E., DEE
Chief, Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261
Telephone: (601) 961-5171 Facsimile: (601) 961-5703

ACID RAIN PERMIT

Issued to:	R.D. Morrow, Sr. Generating Plant
Operated by:	South MS Electric Power Association
ORIS code:	06061
Effective:	**June 22, 2011** through **May 31, 2016**

ACID RAIN PERMIT CONTENTS:

1. Statement of Basis.

2. SO_2 allowances allocated under this permit and NO_x requirements for each affected unit.

3. Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements or conditions.

4. The permit application submitted for this source. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

1. STATEMENT OF BASIS:

Statutory and Regulatory Authorities: In accordance with the Mississippi Air and Water Pollution Control Law, specifically Miss. Code Ann. §§ 49-17-1 through 49-17-43, and any subsequent amendments, and Titles IV and V of the Clean Air Act, the Mississippi Department of Environmental Quality issues this permit pursuant to the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act, Regulation APC-S-6, and the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act, Regulation APC-S-7.

2. SO_2 ALLOWANCE ALLOCATIONS AND NO_X REQUIREMENTS FOR EACH AFFECTED UNIT:

		2011	2012	2013	2014	2015	2016
Unit 1	**SO_2 allowances, under Tables 2, 3, or 4 of 40 CFR Part 73.**	**4,808**	**4, 808**	**4, 808**	**4, 808**	**4, 808**	**4,808**
	NO_x limit	**Pursuant to 40 CFR 76.11, the Mississippi Department of Environmental Quality approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2015. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.5 lb/MMBtu.** **Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11 (d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.** **In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.**					

		2010	2012	2013	2014	2015	2016
Unit 2	**SO_2 allowances, under Tables 2, 3, or 4 of 40 CFR Part 73.**	**5,263**	**5,263**	**5,263**	**5,263**	**5,263**	**5,263**
	NO_x limit	**Pursuant to 40 CFR 76.11, the Mississippi Department of Environmental Quality approves a NO_x emissions averaging plan for this unit, effective from calendar years 2011 through 2016. Under the plan, this unit's NO_x emissions shall not exceed the annual average alternative contemporaneous emission limitation of 0.5 lb/MMBtu.** **Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR 76.5, 76.6, or 76.7, except that for any early election units, the applicable emission limitations shall be under 40 CFR 76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR 76.11 (d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.** **In addition to the described NO_x compliance plan, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.**					

3. COMMENTS, NOTES AND JUSTIFICATIONS: None.

4. PERMIT APPLICATION: Attached

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

EPA

Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: ☐ New ☒ Revised

STEP 1

Identify the source by plant name, State, and ORIS code.

R.D.Morrow, Sr. Generating Plant	MS	6061
Plant Name	State	ORIS Code

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a." For new units, enter the requested information in columns "c" and "d."

a	b	c	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
1	Yes		
2	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		
	Yes		

STEP 3

Read the standard requirements

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

STEP 3, Cont'd.

Nitrogen Oxides Requirements The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

Liability, Cont'd.

STEP 3, Cont'd.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a unit can hold; *provided,* that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4

Read the certification statement, sign, and date

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Nathan Brown	
Signature Nath Brown	Date 12/29/2009

APPENDIX D

COMPLIANCE ASSURANCE MONITORING PLAN

COMPLIANCE ASSURANCE MONITORING
ELECTROSTATIC PRECIPITATOR (ESP) FOR PARTICULATE MATTER (PM) CONTROL
R. D. MORROW SR. GENERATING PLANT
FACILITY NO. 1400-00021

I. Background

A. Emissions Unit

Description:	Coal-fired boilers
Identification:	Unit 1, Unit 2
APCD ID:	ESP1, ESP2
Facility:	R.D. Morrow Sr. Generating Plant Purvis, MS

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation:	Permit No. 1440-00021, 40 CFR Part 60, Subpart D
Emission Limits:	0.1 lb/mmBtu
Current Monitoring Requirements:	Stack Test, EPA RM 5

C. Control Technology: Hot-side Electrostatic Precipitator

II. Monitoring Approach

The ESPs on Units 1 and 2 are equipped with automatic voltage control (AVC) systems. The precipitator control systems are uniquely equipped with an adaptive control feature which automatically adjusts control parameters thus reducing or eliminating the need for manual adjustments to the systems by operating personnel.

The only continuous indicator of precipitator performance, aside from Method 9 visual observations, is the Continuous Opacity Monitoring Systems (COMS). The opacity measurement serves as a worst-case indication of stack particulate emissions. The opacity analyzers are physically located in the flue gas ductwork downstream of each precipitator. This measurement location is upstream of the flue gas desulfurization systems (FGD, i.e., wet limestone scrubbers) on each unit. Additional particulate removal occurs in the FGD that is not reflected in opacity measurements. While opacity is considered only an indicator of particulate emissions, it is an available continuous indicator of precipitator performance that is utilized by the precipitator AVC systems to optimize control settings.

II. Monitoring Approach (cont'd)

The control system continuously monitors and controls the voltage and current (power) to each of the eighteen (18) transformer-rectifier (T/R) sets. In general, ESP performance improves as total power input increases. However, power distribution plays a key role in the performance of the ESP. For this reason, the AVC systems optimize primary and secondary voltage and current in each T/R to obtain the best opacity at the lowest power input. The systems have an Operator interface which allows for viewing of each T/R's control parameter values.

A key feature of the AVC system is the Precipitator Optimization System (POS). POS automatically adjusts the voltage control's operating limits based on opacity and precipitator power. POS lowers the total power of precipitator in increments of 10% of total power until it reaches the lower limit of the optimization program (50% of full power) or until an opacity of 12% is reached. If the opacity is 12% or more, the optimization is aborted and the precipitator is automatically raised to full power until the opacity returns to or drops below 12%. Upon reaching 12% or below at full power, optimization is automatically resumed. The aforementioned parameters are adjustable and can be set to other values if deemed necessary.

Should aborting the optimization and returning the ESPs to full power not result in restoring expected performance, inspections and corrective actions are implemented by I&E personnel to isolate and correct the source of the problem. The CEMS/COMS data acquisition and handling system (DAHS) is configured with alarms prompting corrective action. Excess emissions are recorded in the DAHS along with reason/corrective action codes.

Maintaining opacity targets at the lowest possible power levels should result in extended performance and integrity of the electrical components of the ESPs. The AVC systems also automatically provide protective features to the components of the systems. Once user defined parameters for the ESPs have been refined with operating experience, the precipitator control system essentially functions without manual operator interaction. System monitoring is performed by operating and I&E personnel on a periodic basis via the operator interface computer located in the control room.

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Unit No.	Date	Avg. PM Emission Emission Rate (lb/MMBtu)	% of Allowable PM Emission Rate of 0.1 lb/MMBtu	Avg. COMS % Opacity
2003				
1-Run 1	10/2/03	0.026	26	13%
1-Run 2	10/2/03	0.023	23	13%
1-Run 3	10/2/03	0.026	26	13%
2-Run 1	10/1/03	0.019	19	9%
2-Run 2	10/1/03	0.018	18	10%
2-Run 3	10/1/03	0.020	20	10%
2004				
1-Run 1	9/29/04	0.022	22	14.50
1-Run 2	9/29/04	0.024	24	16.28
1-Run 3	9/29/04	0.030	30	15.84
1-Run 1	9/29/04	0.030	30	19.79
1-Run 2	9/29/04	0.033	33	18.78
1-Run 3	9/29/04	0.032	32	18.84
2-Run 1	9/30/04	0.025	25	15.91
2-Run 2	9/30/04	0.022	22	17.21
2-Run 3	9/30/04	0.024	24	16.59
2-Run 1	9/30/04	0.022	22	19.32
2-Run 2	9/30/04	0.032	32	20.28
2-Run 3	9/30/04	0.037	37	20.90

As indicated by the October 2003 PM testing results, it appears that the 12% opacity setpoint of the AVC system is protective of the PM standard of 0.1 lb/MMBtu.

Additional stack testing conducted in September of 2004 indicates the precipitator control system parameters adjusted such that an average COMS reading of approximately 20% at full boiler load and at stable, steady state unit operation is also protective of the PM standard of 0.1 lb/MMBtu.

As indicated in the original CAM Plan (sent to Ms. Maya Rao June 7, 2004), “If the testing results show that for an approximate opacity value of 20% that the particulate emission rate is sufficiently below 0.1 lb/mmbtu, then an opacity value of 20% will be our upper limit indicator.”

Page Four

Because the test results do show that for an approximate opacity value of 20% (COMS reading) that the particulate emission rate is sufficiently below 0.1 lb/MMMBtu, the following upper limit indicator will be implemented:

Opacity value of 20% (COMS reading).

With this upper limit indicator established, the following monitoring approach will be employed:

- The indicator will be the opacity in the ESP exhaust as measured by COMS in the ESP exhaust.
- When the hourly average COMS data exceeds the upper limit of the indicator range, corrective actions will be taken, including but not limited to, the following:
    1. Stabilizing boiler load at a level where the upper limit of the indicator range is not exceeded. This action would include avoidance of rapid changes in unit load that would otherwise causes excursions.
    2. Reducing unit load to a level where the upper limit of the indicator range is not exceeded and a reasonable margin of compliance can be maintained.
    3. Notification to and deployment of I&E personnel to the environmental control room such that on-line optimization / adjustment of the AVC system can be conducted such that the indicator range is no longer exceeded.
    4. If these corrective actions are ineffective in reducing the COMS measurement below the upper limit of the indicator range, then steps would be taken to remove the unit from service such that off-line inspection and repairs could be implemented.
    5. Notification of the MDEQ, in writing, within seven (7) days of an excursion and the corrective actions taken. An excursion is defined as a COMS hourly average that exceeds the upper opacity limit defined for limiting the particulate emissions below 0.1 lb/mmbtu. The hourly average is the average for the 60 minutes between hours.
    6. An exception to the upper limit is allowed in times of start up, when the upper limits shifts to an opacity value of 40%. Start up is defined as the time when the unit first starts up after an outage (a period when no generation is taking place) on fuel oil only, and lasts until the unit is burning coal only on one mill and the igniter (associated with the same coal mill) is not being used.

The QA/QC of the continuous opacity monitoring systems (COMS) will be consistent with the requirements of 40 CFR 60, Appendix B, Performance Specification 1.

The monitoring approach, described in narrative detail above, is represented in tabular format below:

I. Indicator Measurement Approach	Opacity of ESP exhaust. COMS in ESP exhaust.
II. Indicator Range	Upper Limit – 20% Opacity (COMS reading)
III. Performance Criteria A. Data Representativeness	Continue to operate the existing COMS at a representative location in the ESP exhaust per 40 CFR 60, Appendix B, Performance Specification 1 (PS-1) [note that the revised version of PS-1 applies only to new or relocated opacity monitors].
B. Verification of Operational Status	Results of initial COMS performance evaluation conducted per PS-1.
C. QA/QC Practices/Criteria	Operate and evaluate the existing COMS per PS-1. Check the zero and span drift daily and perform a quarterly filter audit.
D. Monitoring Frequency	Monitor the opacity of the ESP exhaust continuously [(every 10 seconds)- delete]
E. Data Collection Procedures	Set up the data acquisition system (DAS) to retain all 1-minute and 6-minute and hourly average opacity data.
F. Averaging period	Use the 1-minute opacity data to calculate 6-minute averages. An excursion occurs when the one hour opacity average exceed the upper opacity limit defined for limiting the PM emission rate below 0.1lb/mmbtu..

APPENDIX E

Mercury Air Toxics Rule Compliance Date Extension Letter

STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
TRUDY D. FISHER, EXECUTIVE DIRECTOR

May 9, 2013

Mr. James Compton, General Manager
South Mississippi Electric Power Association, R D Morrow Plant
PO Box 15849
Hattiesburg, MS 39404-5849

Dear Mr. Compton:

Re: 40 CFR 63, Subpart UUUUU
Compliance Extension Request
R.D. Morrow, Sr. Generating Station
Units 1 & 2
Air Ref. No. 1440-00021
Lamar County

Dear Mr. Compton:

We have completed our review of your April 23, 2013, request for an extension to the compliance date for the NESHAP from Coal- and Oil-Fired Electric Utility Steam Generating Units, 40 CFR Part 63, Subpart UUUUU. We have determined that the request for Units 1 and 2 at the referenced facility has merit and the extension will be granted.

Per §63.6(i)(4)(i)(A), facilities making such requests are also required to apply for a modification to the Title V Operating Permit (TVOP) to incorporate the conditions under which an extension is granted. We ask that you submit a request for modification no later than June 30, 2013. Please be advised this letter shall serve as your official notification that the Subpart UUUUU compliance date for the referenced units is now **April 16, 2016**. The extension granted by this letter is contingent upon completion of the following milestones:

1) The permittee shall submit information detailing any and all construction activities related to the installation of the control equipment necessary to comply with Subpart UUUUU in accordance with Condition 5.A.4 of the TVOP. This information shall include all construction activities that have occurred in the previous six months and shall begin when the next required submittal is due after issuance of this approval.

OFFICE OF POLLUTION CONTROL
POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us

2) The permittee shall provide our office with a notification of the date construction of the control equipment is completed on each unit within five (5) days of such date.

3) The permittee shall provide our office with a notification of the date each unit achieves compliance within (5) days of such date. The compliance extension for each unit expires once this notice is provided to our office.

Please be advised that if these requirements are not met, the facility will be considered out of compliance with the requirements of Subpart UUUUU and an enforcement action to resolve the matter will be recommended.

If you have any questions, please do not hesitate to contact me at (601) 961-5556.

Sincerely,

Melissa Fortenberry

Melissa Fortenberry, P.E.
Air Toxics Branch

mbf

cc: Mr. Joseph Ward - SMEPA
Mr. Bryan Collins, EPD – MDEQ
Mr. Jay Barkley, ECED - MDEQ