

STATE OF MISSISSIPPI AND FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL

PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A
SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Louis Dreyfus Company River Elevators LLC, Port of Rosedale, River Elevator
489 David Work Drive
Rosedale, Mississippi
Bolivar 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: June 15, 2020

Permit No.: 0240-00097

Modified:

Effective Date: As specified herein.

Expires: May 31, 2025

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-000	----	Grain Elevator Facility-wide
AA-001	1-13	20,000 CFM Receiving Dust Control System
AA-002	2-13	20,000 CFM Receiving Dust Control System
AA-003	3-13	62.1 MMBtu/hr Natural Gas Tower Grain Dryer
AA-004	4-13	Barge Loading Spouts
AA-005	5-13	Whole Grain Concrete Storage Silo #1
AA-006	6-13	Whole Grain Concrete Storage Silo #2
AA-007	7-13	Whole Grain Concrete Storage Silo #3
AA-008	8-13	Whole Grain Concrete Storage Silo #4
AA-009	9-13	Whole Grain Concrete Storage Silo #5
AA-010	10-13	20,000 BPH Reclaim Belt (BC-400)
AA-011	11-13	20,000 BPH Reclaim Belt (BC-500)
AA-012	12-13	20,000 BPH Transfer Belt (BC-202)
AA-013	13-13	20,000 BPH Transfer Belt (BC-201)
AA-014	14-13	40,000 BPH Transfer Belt (BC-332)
AA-015	15-13	15,000 BPH Dry Drag (DC-308)
AA-016	16-13	15,000 BPH Wet Drag (DC-302)
AA-017	17-13	40,000 BPH Barge Loading Belt (BC-706)
AA-018	18-13	Truck Loading
AA-019	-----	Truck Unloading, controlled by Emission Point AA-001 and AA-002
AA-020	20-13	Whole Grain Concrete Storage Silo #6
AA-021	1-14	20,000 BPH Receiving Drag (DC-103)
AA-022	1-15	20,000 BPH Receiving Drag (DC-109)

Emission Point	Facility Reference	Description
AA-023	2-14	20,000 BPH Receiving Drag (DC-102)
AA-024	2-15	20,000 BPH Receiving Drag (DC-108)
AA-025	11-14	20,000 BPH Reclaim Belt (BC-600)
AA-026	12-14	20,000 BPH Transfer Belt (BC-206)
AA-027	13-14	20,000 BPH Transfer Belt (BC-205)
AA-028	13-15	20,000 BPH Transfer Belt (BC-210)
AA-029	14-14	40,000 BPH Transfer Belt (BC-322)
AA-030	14-15	40,000 BPH Transfer Belt (BC-330)
AA-031	15-14	5,000 BPH Loadout Drag (DC-212)
AA-032	21-13	20,000 CFM Receiving Dust Control System
AA-033	22-13	20,000 BPH Receiving Drag (DC-111)
AA-034	23-14	60,000 BPH Receiving Drag (BC-700)

**SECTION 3
EMISSION LIMITATIONS AND STANDARDS**

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	Throughput	<i>Throughput limitations (Title V avoidance)</i> ≤ 684,000 tons grain per year
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.2	PM	PM ≤ 249.0 tons/yr
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.3	PM ₁₀	PM ₁₀ ≤ 99.0 tons/yr
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.4	PM	E = 4.1 p ^{0.67}
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.5	Opacity	Opacity ≤ 40%
	11 Miss. Admin. Code Pt. 2, R. 1.3.A.	3.6	Opacity	Opacity ≤ 40%
	40 CFR 60 Subpart DD (Standards of Performance for Grain Elevators) 40 CFR 60.300, Subpart DD	3.7	PM Opacity	Applicability
AA-001 AA-002 AA-032	40 CFR 60.302(b), Subpart DD	3.8	PM Opacity	0.023 g/dscm (ca. 0.01 gr/dscf) ; Opacity ≤ 0%
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.9	Pressure Drop	1 ≤ ΔP ≤ 5 in. H ₂ Og
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.10	Work Practice	Operate control device at all times when processing
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11		Maintain inventory of spare parts/equipment to repair/replace
AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.12	PM	E = 0.8808 * I ^{-0.1667}
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.13	SO _x	4.8 lbs SO ₂ /mmBTU
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.14	Fuel Standards	Combust only natural gas or liquid propane
	40 CFR 60.302(a)(1), Subpart DD	3.15	Opacity	Opacity ≤ 0%
AA-004 AA-017	40 CFR 60.302(c)(4), Subpart DD	3.16	Opacity	Opacity ≤ 20%
AA-005 through AA-016 AA-020 through AA-034	40 CFR 60.302(c)(2), Subpart DD	3.17	Opacity	Opacity ≤ 0%
AA-018	40 CFR 60.302(c)(3), Subpart DD	3.18	Opacity	Opacity ≤ 10%
AA-019	40 CFR 60.302(c)(1), Subpart DD	3.19	Opacity	Opacity ≤ 5%

3.1 For Emission Point AA-000, the permittee shall limit total facility-wide maximum throughputs to no more than 684,000 tons grain per year (tpy) as determined for each consecutive 12-month period on a rolling basis.

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

- 3.2 For Emission Point AA-000, the permittee shall limit total facility-wide PM emissions to no more than 249.0 tons per year (tpy) as determined for each consecutive 12-month period on a rolling basis.

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

- 3.3 For Emission Point AA-000, the permittee shall limit PM₁₀ emissions to no more than 99.0 tons per year (tpy) individually as determined for each consecutive 12-month period on a rolling basis.

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

- 3.4 For Emission Point AA-000, except as otherwise specified, no person shall cause, permit, or allow the emission 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).)

- 3.5 For Emission Point AA-000, no person shall 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. and b. below.

- 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.)

- 3.6 For Emission Point AA-000, no person shall 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 Condition 3.5.

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

- 3.7 For Emission Point AA-000, the permittee is subject to and shall comply with the applicable requirements of the Standards of Performance for Grain Elevators, 40 CFR Part 60, Subpart DD and the General Provisions, 40 CFR Part 60, Subpart A.

(Ref.: 40 CFR 60.300, Subpart DD)

- 3.8 For Emission Points AA-001 (dust control system), AA-002 (cartridge filter), and AA-032, the permittee shall not cause to be discharged into the atmosphere from any affected facility except a grain dryer any process emission which:
- a. Contains particulate matter in excess of 0.023 g/dscm (ca. 0.01 gr/dscf).
 - b. Exhibits greater than 0 percent opacity.
- (Ref.: 40 CFR 60.302(b), Subpart DD)
- 3.9 For Emission Points AA-001, AA-002, and AA-032, the permittee shall maintain a pressure drop between 1 and 5 in. H₂O (gauge).
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.10 For Emission Points AA-001, AA-002, and AA-032, the permittee shall operate the control device at all times when processing. Should any control device become non-operational then the respective process shall be shut down immediately, but not as to cause damage to equipment or property or cause further environmental problems. The process shall not startup again until such time that the control device becomes operational and proper efficiency of the pollution control equipment is restored.
(11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.11 For Emission AA-001, AA-002, and AA-032, the permittee shall maintain an inventory of spare parts and equipment as is necessary to repair and/or replace the pollution control system.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.12 For Emission Point AA-003, the maximum permissible emission of ash and/or particulate matter from 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).)
- 3.13 For Emission Point AA-003, 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).)
- 3.14 For Emission Point AA-003, the permittee shall combust only natural gas or liquid propane in the dryer.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 3.15 For Emission Point AA-003, the permittee shall not cause to be discharged into the atmosphere any gases which exhibit greater than 0% opacity.
(Ref.: 40 CFR 60.302(a)(1), Subpart DD)
- 3.16 For Emission Points AA-004 and AA-017, the permittee shall not cause to be discharged into the atmosphere any fugitive emission which exceeds an opacity of 20%.

(Ref.: 40 CFR 60.302(c)(4), Subpart DD)

- 3.17 For Emission Points AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, AA-016, AA-020, AA-021, AA-022, AA-023, AA-024, AA-025, AA-026, AA-027, AA-028, AA-029, AA-030, AA-031, AA-032, AA-033, and AA-034, the permittee shall not cause to be discharged into the atmosphere any fugitive emission which exceeds an opacity of 0%.

(Ref.: 40 CFR 60.302(c)(2), Subpart DD)

- 3.18 For Emission Point AA-018, the permittee shall not cause to be discharged into the atmosphere any fugitive emission which exceeds an opacity of 10%.

(Ref.: 40 CFR 60.302(c)(3), Subpart DD)

- 3.19 For Emission Point AA-019, the permittee shall not cause to be discharged into the atmosphere any fugitive emission which exceeds an opacity of 5%.

(Ref.: 40 CFR 60.302(c)(1), Subpart DD)

**SECTION 4
WORK PRACTICES**

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SECTION 5 MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Monitoring/Recordkeeping Requirement
AA-000	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(10).	5.2	Recordkeeping	Record total grain throughput
AA-001 AA-002 AA-032	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10). and 40 CFR 60.303(b) and (c), Subpart DD	5.3	PM	Stack testing requirement
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Pressure Drop	Maintain pressure drop devices
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.5	Pressure Drop	Electronic record of pressure drop readings and maintain a log of maintenance performed
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.6	Recordkeeping	Operational status
AA-001 AA-002 AA-003 AA-004 AA-005 AA-006 AA-007 AA-008 AA-009 AA-010 AA-011 AA-012 AA-013 AA-014 AA-015 AA-016 AA-017 AA-018 AA-019 AA-020 AA-021 AA-022 AA-023 AA-024 AA-025 AA-026 AA-027 AA-028 AA-029 AA-030 AA-031 AA-032 AA-033 AA-034	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.7	Opacity	Conduct weekly Method 22 (VEE) readings
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.8	Opacity	Conduct Method 9 (VEE) readings when visible emissions are observed
AA-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	Recordkeeping	Record amount of fuel used

- 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 Emission Point AA-000, the permittee shall maintain sufficient records to document monthly grain throughput in tons per month and a rolling 12-month total. Records should indicate total amount of grain received and loaded-out along with a breakdown by receiving and load-out locations.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)
- 5.3 For Emission Points AA-001, AA-002, and AA-032, the permittee shall conduct a performance test within 12 months of permit issuance and then every five years thereafter not to exceed 60 months from the previous test to determine compliance with the particulate matter standards in 40 CFR 60.302 as follows:
- a. Method 5 shall be used to determine the particulate matter concentration and the volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 60 minutes and 1.70 dscm (60 dscf). The probe and filter holder shall be operated without heaters. As an alternative to using Method 5, the permittee may use Method 17.
 - b. Method 2 shall be used to determine the ventilation volumetric flow rate.
 - c. Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11). and 40 CFR 60.303(b) and (c), Subpart DD)
- 5.4 For Emission Points AA-001, AA-002, and AA-032, the permittee shall maintain measuring devices for continuous monitoring and/or measurement of pressure drop across the baghouse emission system.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 5.5 For Emission Points AA-001, AA-002, and AA-032, the permittee shall ensure compliance as follows:
- a. An electronic record of the pressure drop measurements shall be recorded while the control device is in use.
 - b. If the pressure drop is outside of the pressure range allowed in Condition 3.9, the facility shall conduct an investigation to determine the cause. All pressure readings outside of the allowed range shall be documented with the date and length of time outside of the allowed pressure range along with the cause of the issue and any corrective actions taken.

- c. Maintain a log of maintenance performed on the baghouses and the pressure drop measurement system, which shall list the date, the maintenance being performed, and the reason for the maintenance. A log should also be maintained detailing when the systems are operated outside the pressure range specified in Condition 3.9.

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

- 5.6 For Emission Points AA-001, AA-002, and AA-032, the permittee shall keep records of any events where the baghouse was nonoperational and the process was running or shutdown. These records should at a minimum include the duration the baghouse was non-operational; the reason the baghouse was non-operational; how long the process was operational while the baghouse was non-operational; and what corrective actions were taken.

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

- 5.7 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, AA-016, AA-017, AA-018, AA-019, AA-020, AA-021, AA-022, AA-023, AA-024, AA-025, AA-026, AA-027, AA-028, AA-029, AA-030, AA-031, AA-032, AA-033, and AA-034, the permittee shall conduct a visual determination of fugitive emissions using EPA Test Method 22 on a weekly basis while receiving/loading. Results shall be recorded in log form. If no receiving or load out has taken place within the weekly time frame, this shall be noted.

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

- 5.8 For Emission Points AA-001, AA-002, AA-003, AA-004, AA-005, AA-006, AA-007, AA-008, AA-009, AA-010, AA-011, AA-012, AA-013, AA-014, AA-015, AA-016, AA-017, AA-018, AA-019, AA-020, AA-021, AA-022, AA-023, AA-024, AA-025, AA-026, AA-027, AA-028, AA-029, AA-030, AA-031, AA-032, AA-033, and AA-034, in addition to Condition 5.7 (weekly Method 22), the permittee shall conduct and record a Visible Emission Evaluation in accordance with EPA Test Method 9 and the procedures in 40 CFR 60.11 to determine opacity whenever visible emissions are observed. The permittee shall record any corrective actions taken as a result of the Method 9 Test.

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

- 5.9 For Emission Points AA-003, the permittee shall maintain sufficient records to document type and amounts of fuel burned.

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

SECTION 6 REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.2	Submit certified annual monitoring report.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.3	All documents submitted to the DEQ shall be certified by a Responsible Official.
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.4	Reporting requirements
AA-001 AA-002 AA-032	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.5	Submit stack test protocol 30 days prior to the intended test day and 10 day notification
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.6	Submit stack test within 60 days of completed stack test
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.7	Notify the DEQ of any rescheduled or aborted stack test

- 6.1 For Emission Point AA-000, 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 For Emission Point AA-000, 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 For Emission Point AA-000, 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 Emission Point AA-000, the permittee shall submit in accordance with the annual report required in Condition 6.2, the following information:

- a. The total facility PM/PM10/PM2.5 emission rate in tons per year during each month and the rolling 12-month total along with a description of the method(s) used to determine the total facility PM/PM10/PM2.5 emission rate. The permittee shall use actual stack test data, if available, and actual production and/or actual operating hours to demonstrate compliance. If stack test data is not available, EPA or industry-approved emission factors may be used.
 - b. The information on grain throughput as required to be recorded by Condition 5.2.
 - c. The type and amount of fuel combusted in the combustion sources.
 - d. A log of episodes when the baghouses operated outside the allowed pressure range.
 - e. Records of nonoperational baghouses as required in Condition 5.6.
 - f. Results of any EPA Test Method 9 conducted as required in Condition 5.8
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.5 For AA-001, AA-002, and AA-032, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) required by Condition 5.3 to ensure that all test methods and procedures are acceptable to the DEQ. If the permittee is proposing an alternative test method not previously approved by EPA, a cover letter indicating such must be attached and submitted with the test protocol.
- The permittee shall submit notification to the DEQ at least ten (10) days prior to the scheduled date(s) to afford an observer the opportunity to witness the test(s).
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.6 For Emission Points AA-001, AA-002, and AA-032, the stack test results shall be submitted to the DEQ within 60 days following the completion of the test required by Condition 5.3.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)
- 6.7 For Emission Points AA-001, AA-002, and AA-032, the permittee shall notify the DEQ of any rescheduled or aborted test and the reason for such.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)