

STATE OF MISSISSIPPI AIR POLLUTION CONTROL TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Dart Container Company of Mississippi LLC
197 Harris Avenue
Quitman, Mississippi
Clarke 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: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: [Date not to exceed 5 years from issuance]

Permit No.: 0440-00053

12335 PER20230001

DRAFT/PROPOSED - [Date]

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

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

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

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

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

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

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

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

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

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

- 1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in 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).)

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

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

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

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

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

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

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

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

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

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

- 1.11 The permittee shall allow the MDEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located 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).)

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

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

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

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

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

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

1.15 Nothing in this permit shall alter or affect the following:

- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

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

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

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

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V 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 MDEQ any additional information identified as being needed to process the application.

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

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

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other 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).)

- 1.19 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.)

- 1.20 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, 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 Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source.

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

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

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

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

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

- 1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, 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 airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

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

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

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in 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.)

- 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.

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

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-001	29.3 MMBtu/hr natural gas or No. 2 fuel oil-fired steam generating boiler.
AA-002	25.1 MMBtu/hr natural gas or No. 2 fuel oil-fired steam generating boiler.
AA-003	33.5 MMBtu/hr natural gas or No. 2 fuel oil-fired steam generating boiler.
AA-004	Cup Manufacturing: Pre-Expansion Process Area which consists of expandable polystyrene (EPS) bead pre-blender dumpers, blenders, holding tanks, pre-expanding equipment, pre-puff screeners, and pre-puff holding bags. Emissions from this process are vented to Emission Points AA-001, AA-002, and AA-003 for control of VOCs. Fugitive emissions are vented through the building ventilation system.
AA-005	Cup Manufacturing: Pre-Puff Storage and Steam Chest Molding where pre-puff is converted to EPS containers. Emissions are vented through the building ventilation system.
AA-006	Cup Printing: Flexographic-type UV printing presses which print UV curable ink on EPS containers.
AA-007	Cup Manufacturing: Finished Product Warehouse Area where packaged cups are stored prior to shipping. Emissions are vented through the building ventilation system.
AA-011	Part Cleaners associated with the printing machines.
AA-012	Part Cleaners associated with manufacturing equipment.
AA-013	Part Cleaners associated with maintaining delivery trucks and forklifts.
AA-015	Scrap Cup Baler
AA-018	Cold Press Densifier used to handle post-consumer waste by compacting EPS foam
EG-001	158 HP (118 kW/1.15 MMBtu/hr) diesel-fired emergency engine used to power backup generator for the lighting system (Model Year 2007)

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 Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

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

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

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

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

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 (PSD BACT Limit)	3.B.1	VOC	≤ 495.0 tons per year determined on a 12-month rolling total basis
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.2	PM (filterable)	$E = 0.8808 * T^{-0.1667}$
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.3	SO ₂	4.8 lbs/MMBtu
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 (PSD BACT Limit)	3.B.4	VOC	Minimum destruction efficiency of 95% for captured vent gas from the pre-expander process area
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the federally enforceable Permit to Construct issued May 14, 1997, and modified on October 17, 1997	3.B.5	Fuel limitation	Limited to burning only natural gas, No. 2 fuel oil with a maximum sulfur content of 0.5% by weight, or vent gas from the pre-expander process area
	40 CFR 63, Subpart JJJJJJ NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR 63.11193, 63.11194, 63.11200(c), Subpart JJJJJJ	3.B.6	HAP	Applicability
AA-004	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 (PSD BACT Limit)	3.B.7	VOC	Emissions captured and routed to the boilers for control of VOC
AA-004 AA-005 AA-007	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.8	PM (filterable)	$E = 4.1p^{0.67}$
EG-001	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.9	PM (filterable)	0.6 lbs/MMBtu

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
EG-001	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6580, 63.6585 (a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.B.10	HAP	Applicability
EG-001	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i), Subpart IIII	3.B.11	NO _x + NMHC CO PM (filterable) SO ₂	Applicability
	40 CFR 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII and 40 CFR 1039, Appendix I, Table 3	3.B.12	NO _x + NMHC CO PM (filterable)	4.0 g/kW-hr 5.0 g/kW-hr 0.30 g/kW-hr
	40 CFR 60.4205(b) and 60.4202(a)(2), Subpart IIII and 40 CFR 1039.105(b), Subpart B	3.B.13	Opacity	≤ 20 % during acceleration mode ≤ 15 % during lugging mode ≤ 50% during the peaks in either mode
	40 CFR 60.4207(b), Subpart IIII and 40 CFR 1090.305, Subpart D	3.B.14	SO ₂ (Diesel fuel requirements)	Sulfur content of 15 ppm max AND Minimum cetane index of 40 OR maximum aromatic content of 35 volume percent
	40 CFR 60.4209(a), Subpart IIII	3.B.15	NO _x + NMHC CO PM (filterable)	Install non-resettable hour meter
	40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII	3.B.16		Certified engine requirements
	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.B.17		Operating requirements
AA-001 AA-002 AA-003	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.18	VOC	Applicability

3.B.1 The permittee shall limit facility-wide VOC emissions to less than or equal to 495.0 tons per year determined on a 12-month rolling total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 [PSD BACT Limit])

- 3.B.2 For Emission Points AA-001, AA-002, and AA-003, the maximum permissible particulate matter emissions from fossil fuel burning installations equal to or greater than 10 million BTU per hour heat input but less than 10,000 million BTU per hour heat input shall not exceed an emission rate as determined by the following 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.B.3 For Emission Points AA-001, AA-002, and 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.B.4 Emission Points AA-001, AA-002, and AA-003 shall maintain a minimum destruction efficiency of 95% when used as a control device for pentane (VOC) emissions from Emission Point AA-004.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 [PSD BACT Limit])

- 3.B.5 The permittee shall be limited to burning the following fuels in Emission Points AA-001, AA-002, and AA-003:

- (a) Natural gas;
- (b) No. 2 fuel oil with a maximum sulfur content of 0.5 percent (by weight); and/or
- (c) Captured vent gas from the pre-expander process area (Emission Point AA-004).

All other fuels are prohibited. The fuel oil sulfur limit applies at all times, including periods of startup, shutdown, and malfunction.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the federally enforceable Permit to Construct issued May 14, 1997, and modified on October 17, 1997)

- 3.B.6 Emission Points AA-001, AA-002, and AA-003 are subject to and shall comply with applicable requirements of the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJ and the applicable General Provisions of 40 CFR 63, Subpart A as identified in Table 8 of Subpart JJJJJ. For purposes of this subpart, these boilers are considered oil-fired boilers.

(Ref.: 40 CFR 63.11193, 63.11194, and 63.11200(c), Subpart JJJJJ)

- 3.B.7 Any time Emission Point AA-004 is in operation, emissions shall be captured and routed to Emission Points AA-001, AA-002, and AA-003 for control of pentane (VOC).

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011 [PSD BACT Limit])

- 3.B.8 For Emission Points AA-004, AA-005, and AA-007, except as otherwise specified, the permittee shall not cause, permit, or allow the emission of particulate matter in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the following relationship:

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

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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

- 3.B.9 For Emission Point EG-001, 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.10 Emission Point EG-001 is subject to and shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ and the applicable General Provisions, 40 CFR 63, Subpart A as identified in Table 8 of Subpart ZZZZ.

For purposes of this subpart, Emission Point EG-001 is considered a new, emergency

compression ignition stationary RICE located at an area source of HAP emissions. Per 40 CFR 63.6590(c)(1), the engine shall meet the requirements of Subpart ZZZZ by meeting the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

(Ref.: 40 CFR 63.6580, 63.6585 (a) and (c), and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ)

- 3.B.11 Emission Point EG-001 is subject to and shall comply with the applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII, and the General Provisions, 40 CFR 60, Subpart A as specified in Table 8 of Subpart IIII.

(Ref.: 40 CFR 60.4200(a)(2)(i), Subpart IIII)

- 3.B.12 For Emission Point EG-001, the permittee shall operate and maintain the engine such that it achieves the emission standards listed below for the life of the engine:

- (a) $\text{NO}_x + \text{NMHC} \leq 4.0 \text{ g/KW-hr}$
- (b) $\text{CO} \leq 5.0 \text{ g/KW-hr}$
- (c) $\text{PM (filterable)} \leq 0.30 \text{ g/KW-hr}$

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII and 40 CFR 1039, Appendix I, Table 3)

- 3.B.13 For Emission Point EG-001, the permittee shall limit opacity in accordance with the following:

- (a) 20 percent during the acceleration mode;
- (b) 15 percent during the lugging mode; and
- (c) 50 percent during the peaks in either the acceleration or lugging modes.

(Ref.: 40 CFR 60.4205(b) and 60.4202(a)(2), Subpart IIII and 40 CFR 1039.105(b), Subpart B)

- 3.B.14 For Emission Point EG-001, the permittee shall use diesel fuel that has a maximum sulfur content of 15 parts per million (ppm) **AND** either a minimum cetane index of 40 **OR** a maximum aromatic content of 35 volume percent.

(Ref.: 40 CFR 60.4207(b), Subpart IIII and [40 CFR 1090.305](#), Subpart D)

- 3.B.15 For Emission Point EG-001, the permittee shall install and maintain a non-resettable hour meter on the engine.

(Ref.: 40 CFR 60.4209(a), Subpart IIII)

- 3.B.16 For Emission Point EG-001, the permittee shall comply with the applicable emission standards by purchasing, installing, operating, and maintaining an engine that is certified to meet the applicable emission standards. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions and shall only change the emission-related settings that are permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII)

- 3.B.17 Emission Point EG-001 shall be considered an emergency stationary RICE under Subpart IIII provided the engine only operates in an emergency, during maintenance and testing, and during non-emergency situations for 50 hours per year as described in (c) below. If the permittee does not operate the engine in accordance with the requirements in (a)-(c) below, the engine will not be considered an emergency engine under Subpart IIII, and it must then meet all applicable requirements for non-emergency engines.

- (a) There is no limit on the use of the engine during an emergency situation.
- (b) The permittee may operate the engine for maintenance checks and readiness testing for a maximum of 100 hours per calendar year provided the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or insurance company associated with the engines. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating the federal, state, or local standards require maintenance testing of the engine beyond 100 hours per calendar year.
- (c) The emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (b). Except as provided in 40 CFR 60.4211 (f)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1), (2)(i), and (3), Subpart IIII)

- 3.B.18 Emission Points AA-001, AA-002, and AA-003 are subject to and shall comply with all applicable requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a), CAM)

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

- 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).)

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003	40 CFR 63.11201(b), 63.11223(a), and Table 2, Subpart JJJJJ	3.D.1	HAP	Conduct biennial tune-ups within 25 months after the previous one
	40 CFR 63.11205(a), Subpart JJJJJ	3.D.2		General operational and maintenance requirements

- 3.D.1 For Emission Points AA-001, AA-002, and AA-003, the permittee must conduct a performance tune-up biennially in accordance with the requirements specified in (a) through (f) below. Each subsequent tune-up must be completed no more than 25 months after the previous tune-up. If any unit is not operating on the required date for the tune-up, the tune-up must be completed within 30 days of startup.

- (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

- (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (f) Maintain on-site and submit, if requested by the MDEQ, a report containing the information in paragraphs (i) through (iii) below.
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(Ref.: 40 CFR 63.11201(b), 63.11223(a), and Table 2, Subpart JJJJJ)

- 3.D.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall at all times operate and maintain the affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.11205(a), Subpart JJJJJ)

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. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
 - (b) the compliance status;
 - (c) whether compliance was continuous or intermittent;
 - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

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

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

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

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

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

- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. 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. For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e., April 30th, July

31st, October 31st, and January 31st), and any required annual reports shall be submitted by January 31st following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1)., 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

- 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) working days of the time the deviation began.

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

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

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

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

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

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

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

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the federally enforceable Permit to Construct issued May 14, 1997, and modified on October 17, 1997, and 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.1	VOC HAP	Recordkeeping
		5.B.2		Compliance demonstration
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.3	VOC	Performance testing
		5.B.4	Fuel	Maintain monthly fuel usage records
	40 CFR 63.11225(c), Subpart JJJJJ	5.B.5	HAP	Recordkeeping
AA-001 AA-002 AA-003	40 CFR 64.3(a) and (b), and 64.6(c), CAM	5.B.6	VOC	Continuously monitor VOC concentration of inlet air to boilers and the combined captured air flow rate from the EPS process
			Flame presence and temperature	Monitor flame presence daily and record stack temperature on a daily basis
	40 CFR 64.7(b) and (c), CAM	5.B.7	VOC	Operation and maintenance requirements for monitoring systems
	40 CFR 64.7(d), CAM	5.B.8		Corrective action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.9		Develop a Quality Improvement Plan (QIP), upon proper request
	40 CFR 64.9(b), CAM	5.B.10		Maintain CAM records as specified
EG-001	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.B.11	NO _x + NMHC CO PM (filterable)	Record hours of operation

5.B.1 The permittee shall maintain monthly records consisting of the following information:

(a) Amount of Expandable Polystyrene (EPS) used each month;

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- (b) For each solvent, ink, or other VOC/HAP containing material:
- (1) Quantity used each month;
 - (2) The percentage of VOC and/or HAP by weight of each material; and
 - (3) Density of each material (lbs/gal), unless material usages are measured in pounds

The permittee may utilize data supplied by the manufacturer (i.e., SDS, Technical Data Sheet, etc.) or an analysis of VOC content by EPA Test Method 24 from 40 CFR 60, Appendix A. These records shall be maintained onsite and made readily available to the MDEQ upon request.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the federally enforceable Permit to Construct issued May 14, 1997, and modified on October 17, 1997, and 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011, and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).)

- 5.B.2 The permittee shall demonstrate compliance with the facility-wide VOC emission limit each calendar month and for each consecutive 12-month period in accordance with the following:

- (a) For Emission Points AA-001 through AA-004, the permittee shall use the monitored VOC concentration and captured air flow rate to determine emissions using the following (or equivalent) equation:

$$\text{VOC Emissions} = [\text{Monthly total pentane content in raw material} - (\text{EPS throughput} \times 1.38\%)] - [(\text{VOC Captured}) \times (\text{Destruction Efficiency})]$$

where 1.38% is the average pentane content left in the cup as determined by engineering test data. The total pentane content shall be determined for each shipment using the manufacturer supplied pentane content (%) in the EPS beads multiplied by the weight of the shipment. The average pentane content in the raw material may also be used provided that it is a weighted average based on the total pentane content. The Destruction Efficiency used in the calculation shall be the most recent value demonstrated by testing or the minimum permit limit (i.e., 95%).

- (b) Calculate emissions using mass balance or similar methodology for all other VOC/HAP containing materials using the monthly usage records maintained per Condition 5.B.1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the federally enforceable Permit to Construct issued May 14, 1997, and modified on October 17, 1997, and 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued January 31, 2007, and last modified March 23, 2011)

- 5.B.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall determine the inlet and outlet VOC concentration and destruction efficiency of each unit by performance testing once every 5 years not to exceed 61 months from the previous test. All performance tests shall be approved EPA Reference Methods and shall be completed while Emission Point AA-004 is operating at or near capacity. Additionally, the parametric monitoring values identified in the facility's CAM Plan (i.e., VOC inlet concentration, air flow rate, stack temperature) shall be monitored continuously during the performance test and compared against the continuous monitoring equipment to verify accuracy.

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

- 5.B.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor and maintain records of the amount of each fuel combusted during each calendar month. For each shipment of fuel oil received, the permittee shall maintain records that include the following:

- (a) The name of the supplier;
- (b) A statement from the supplier that the fuel oil complies with the specifications for fuel oil number 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils";
- (c) The sulfur content or maximum sulfur content of the fuel oil.

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

- 5.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain the records specified in (a) through (e) below.

- (a) A copy of each notification and report submitted to comply with Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
- (b) Records to document conformance with the work practice standards which identify each boiler, date of each tune-up, the procedures followed for the tune-up, and the manufacturer's specifications to which the boiler was tuned.
- (c) A copy of the completed energy assessment report.
- (d) Records of the occurrence and duration of each malfunction of a boiler, or of the associated air pollution control and monitoring equipment.
- (e) Records of any actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions Condition 3.D.2 including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(Ref.: 40 CFR 63.11225(c), Subpart JJJJJ)

- 5.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall monitor the following in accordance with the CAM Plan found in Appendix C of this permit.
- (a) Continuously monitor the VOC concentration of the inlet air to the boilers and the combined capture air flow rate from the EPS process to determine capture rates. Equipment downtime shall be documented, summarized, and reported in accordance with Conditions 5.A.4 and 5.A.5, if necessary. Records shall be kept on a chart recorder or electronic data acquisition system and made available for review upon request.
 - (b) Observe and verify combustion and/or the presence of a flame on a daily basis and record the stack temperature. The permittee shall perform burner inspections once per calendar year and perform semiannual combustion checks to determine optimum Oxygen and CO levels. Maintenance shall be performed as necessary to maintain proper operation of the boilers. Records of the daily observations, including any associated maintenance records, shall be kept and made available for review upon request.

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

- 5.B.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:
- (a) *Proper maintenance.* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - (b) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including in data averaging and calculations or in fulfilling a minimum data availability requirement, as applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

- 5.B.8 For Emission Points AA-001, AA-002, and AA-003, upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

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

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

- 5.B.9 For Emission Points AA-001, AA-002, and AA-003, based on the results of a determination made under Condition 5.B.8, MDEQ may require the permittee to develop and implement a Quality Improvement Plan (QIP) containing the elements specified in 40 CFR 64.8(b). The QIP shall be developed and implemented within 180 days of written notification from MDEQ that a QIP is required. MDEQ may require the permittee to make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

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

- 5.B.10 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.9 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions, as applicable. As applicable, records of monitoring data and monitoring performance data should include date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

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

- 5.B.11 For Emission Point EG-001, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.

(Ref.: 40 CFR 60.4209(a) and 60.4214(b), Subpart IIII)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOC	Semiannual report
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.2	VOC	Submittal of test notice, protocol, and test results
	40 CFR 63.11225(b)(1) and (2), Subpart JJJJJ	5.C.3	HAP	Biennial tune-up report
EG-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.4	NO _x + NMHC CO PM (filterable)	Semiannual report
AA-001 AA-002 AA-003	40 CFR 64.9(a), CAM	5.C.5	VOC	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.6		Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring

5.C.1 The permittee shall submit a semiannual report in accordance with Condition 5.A.4, which contains the monthly facility-wide VOC calculations and 12-month rolling totals for the reporting period.

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

5.C.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit the following notices for all required performance tests unless specified otherwise by an applicable regulation:

- (a) A written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to MDEQ. After the first successful submittal of a written test protocol in conjunction with a compliance test, the permittee may request that the resubmittal of the testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
- (b) A notification of the scheduled test date(s) ten (10) days prior to the scheduled test dates(s) so that an observer may be afforded the opportunity to witness the test(s).

- (c) The results from each performance test within sixty (60) days following the completion of the test(s).

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

- 5.C.3 For Emission Points AA-001, AA-002, and AA-003, upon completion of each biennial tune-up, the permittee shall include the following information in the next semiannual report required in accordance with Condition 5.A.4.

- (a) Company name and address;
- (b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (i) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up of each boiler."
 - (ii) "This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(Ref.: 40 CFR 63.11225(b)(1) and (2), Subpart JJJJJ)

- 5.C.4 For Emission Points EG-001, the permittee shall submit semiannual reports in accordance with Condition 5.A.4 summarizing the hours of operation of the engine in the calendar year. This report should also include what hours were for emergency use and what constituted the emergency and what hours were for non-emergency use.

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

- 5.C.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit reports in accordance with Condition 5.A.4 of the following information, as applicable:

- (a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with

zero and span or other daily calibration checks, if applicable); and

- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.9. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

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

- 5.C.6 For Emission Points AA-001, AA-002, and AA-003, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
MDEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	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
PM _{2.5}	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

List of Regulations Referenced In this Permit

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended May 24, 2018)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 5. - Regulations for the Prevention of Significant Deterioration of Air Quality (Amended April 28, 2016)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended February 24, 2022)

40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 CFR 63, Subpart JJJJJ, NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources

40 CFR 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines

40 CFR 64, Compliance Assurance Monitoring

40 CFR 82, Protection of Stratospheric Ozone

APPENDIX C

Compliance Assurance Monitoring (CAM) Plan

	Indicator No. 1	Indicator No. 2
I. Indicator	Capture Rate (lbs of pentane collected/lbs of EPS processed in expanders)	Boiler stack temperature using “Trend” thermometer model # T1.52
II. Indicator Range	0.6 -1.2 %	> 340 °F
III. Performance Criteria	Effective capture	Boiler operating correctly
A. Data Representativeness	Capture rate is determined by monitoring both capture flow rate and concentration. The average concentration and the total daily flow are used to determine the amount captured each day. The monitoring system computer then computes the total amount of pentane captured. This is divided by the amount of EPS processed so that the plant can determine if there are any issues (clogs/blockage/leaks/monitoring equipment calibrations or failures) with the capture or monitoring system. Periods of venting are recorded and reported as deviations. Capture rates outside the range trigger an investigation of both monitoring and capture system components to make sure the system is working correctly, and optimum collection is occurring.	The stack temperature and flame of each operating boiler are checked daily. These two parameters are used to ensure the correct operation of the boiler.
B. Verification of Operational Status	A chart recorder, which records monitoring data, is checked for operational status each shift.	Check for appropriate temperature and flame color. Thermometer calibration will be checked once a year.
C. QA/QC Practices and Criteria	Flow and concentration monitors are calibrated per manufacturers’ recommendations and checked/calibrated if capture rate falls outside expected range.	Semiannual combustion checks are used to optimize O ₂ and CO levels. Meter is calibrated prior to use.
D. Monitoring Frequency	Flow and concentration are measured continuously. Daily checks of flow, concentration, and capture amount are done by the production supervisor. The capture and production data are entered into a spreadsheet to determine capture rate as well. If data is outside of the expected range, verification and troubleshooting checks are performed.	Boiler stack temperatures for operating boilers are checked each day by boiler technician or supervisor.
E. Data Collection Procedures	Flow and concentration are captured on a chart recorder and computer. Capture rate is calculated manually in a spreadsheet.	Boiler stack temperature is recorded manually each morning the boiler is operated, by the boiler technician to assure correct operation during his boiler room walk through. Tune up results are printed for at least three (3) firing rates for each boiler during biennial tune ups.
F. Averaging Period	Daily	N/A