

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

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

USG Interiors LLC
850 North Broadway Street
Greenville, Mississippi
Washington 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) (i.e., the “Federal Act”) 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.: 2800-00075

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SECTION 1. GENERAL CONDITIONS

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

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

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

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

- 1.3 The 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 following provisions:.

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

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions 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 a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening 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 Department of Environmental Quality (DEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

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

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

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

- 1.6 The 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 DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the “Commission”). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) A portion of the fee shall be based on the permittee’s annual quantity of emissions. The permittee shall elect for “actual emissions” 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.
 - (i) “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.

- (ii) “Allowable emissions” are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.
- (iii) Notwithstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

- (b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

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

- (c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., “allowable emissions” or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

- (d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation.

If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee

assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

- (e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

- (f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

- (g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

- (h) If the permittee disagrees with the calculation or applicability of an annual 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.D.)

- 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 DEQ shall contain a certification by a responsible official that states that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

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

- 1.12 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 upon satisfying one of the following conditions:
- (a) Such applicable requirements are included and are specifically identified in the permit; or
 - (b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

(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 to register such a plan pursuant to Section 112(r) of the Federal Act.

(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 that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

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

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

- (a) The changes are not modifications under any provision of Title I of the Federal 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 [i.e., at least seven (7) days or such

other time frame as provided in other regulations for emergencies] and the notification includes the following information:

- (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 either the permittee's prepared “Emission Control Action Program(s)” or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and “Emission Reduction Objectives” specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared and the permittee’s source of air contamination.

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

- 1.20 Except as otherwise provided herein, a modification of the permittee’s facility may require a Permit to Construct in accordance with the provisions specified in Regulation 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 Regulation 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 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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or
 - (2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;
- (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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. or Ch. 5.; or
- (f) Any change in ownership of the stationary source.

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

1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:

- (a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.
- (b) A permit transfer shall be approved upon satisfaction of the following:
 - (1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and
 - (2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

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

- 1.22 This permit is a Federally approved operating permit under Title V of the Federal Act. All terms and conditions in this permit, including any provisions designed to limit the permittee'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 an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; 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 fifty (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 non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
- (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Regulation 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in 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 start-up 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 specified in 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos), 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	Facility Reference	Description
AB-003	PD-1-2	21.1 MMBtu/hr natural gas-fired Paint Dryer #1, Finishing Line #3
AC-001	PS-1	Paint Spray Booth #1, Offline Tile, equipped with fiberglass filters for control of PM emissions from overspray
AC-002	PS-2	Paint Spray Booth, Olympia Line, equipped with fiberglass filters for control of PM emissions from overspray
AD-001	FG-2-2A	Fiberglass Saw Operation equipped with a baghouse
AD-002	--	Halcyon Plank Saw Operation equipped with a baghouse
AD-003	EO-1/EO-2	Halcyon Plank Edge Coating
AD-007	FB-1-C	Central Baghouse #1 controlling emission from #3 Finishing Saw and Grinder
AD-008	FB-2-C	Central Baghouse #2 controlling emission from #3 Finishing Tile Operation
AD-009	FB-3-C	Central Baghouse #3 controlling emission from #3 Finishing Saw Operation
AE-001	--	Starch Storage Silo equipped with a baghouse
AE-002	--	Clay Storage Silo equipped with a baghouse
AE-003	--	800 cfm bin vent filter for high fill material transfer
AE-007	PE-4	12 MMBtu/hr natural gas-fired Perlite Expander #4 equipped with a baghouse
AE-008	PE-5	12 MMBtu/hr natural gas-fired Perlite Expander #5 equipped with a baghouse
AE-009	PE-6	12 MMBtu/hr natural gas-fired Perlite Expander #6 equipped with a baghouse
AE-010	PE-7	12 MMBtu/hr natural gas-fired Perlite Expander #7 equipped with a baghouse
AE-011	PE-8	12 MMBtu/hr natural gas-fired Perlite Expander #8 equipped with a baghouse
AE-018	M3	Mix Tank Dust Collector equipped with a baghouse
AE-019	PO-4 through PO-8	Five (5) Perlite Ore Storage Bins, each equipped with a baghouse
AE-020	PO-9, PO-10	Two (2) Perlite Ore Storage Bins, each equipped with a baghouse
AE-021	--	Storage Silo Bin with Vent Filter
AE-022	--	Scale Hopper Receiver Tank with Vent Filter
AF-001	K-3	180 MMBtu/hr natural gas-fired Drying Kiln, Production Line #3
AF-002	PD-1-3	21.1 MMBtu/hr natural gas-fired Paint Dryer #1, Production Line #3
AF-008	PS-1-3	Paint Spray Booth, Finishing Line #3, equipped with fiberglass filters for control of PM emissions from overspray
AG-003	PS-1-T3	Paint Spray Booth #1, Inline Tile Operation, equipped with fiberglass filters for control of PM emissions from overspray
AH-002	PS-1-FG	Paint Spray Booth #1, Fiberglass Line, equipped with fiberglass filters for control of PM emissions from overspray

Emission Point	Facility Reference	Description
AH-003	PS-2-FG	Paint Spray Booth #2, Fiberglass Line, equipped with fiberglass filters for control of PM emissions from overspray
AI-001	--	54.9 hp (41 kW) diesel-fired compression ignition (CI) emergency generator engine (Deutz Model D914L3, manufactured in 2016)
AI-002	--	8.2 MMBtu/hr natural gas-fired boiler
AI-003	--	6,000-gallon horizontal gasoline storage tank

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) and (b):

- (a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (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 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 Regulation 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

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

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 15, 2019	3.B.1	VOC	≤ 240 tpy (12-month rolling total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 15, 2019 (MACT Avoidance Limit)	3.B.2	HAPs	≤ 9.0 tpy for any individual HAP (12-month rolling total) ≤ 24.0 tpy for total HAPs (12-month rolling total)
	11 Miss. Admin. Code Pt. 2, R. 1.3.F(1).	3.B.3	PM (filterable only)	$E=4.1p^{0.67}$
	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 23, 2007 (PSD Avoidance Limit)	3.B.4	PM/PM ₁₀ /PM _{2.5}	Operate and maintain air pollution control equipment at all times
	40 CFR 63, Subpart CCCCCC NESHAP for Source Category: Gasoline Dispensing Facilities 40 CFR 63.11111(a) and (b), 63.11130, and Table 3, Subpart CCCCCC	3.B.5	HAP	Applicability
AB-003 AE-007 AE-008 AE-009 AE-010 AE-011 AF-001 AF-002 AI-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 23, 2007	3.B.6	Fuel	Combust only pipeline quality natural gas
	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.7	SO ₂	4.8 lb/MMBtu
AB-003 AE-007 AE-008 AE-009 AE-010 AE-011 AF-001 AF-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.8	PM (filterable only)	$E = 0.8808 * I^{-0.1667}$

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AE-007 AE-008 AE-009 AE-010 AE-011	40 CFR 60, Subpart UUU Standards of Performance for Calciners and Dryers in Mineral Industries 40 CFR 60.730, Subpart UUU	3.B.9	PM (filterable only)	Applicability
	40 CFR 60.732 and 60.734(c), Subpart UUU	3.B.10	PM (filterable only)	0.040 gr/dscf
			Opacity	10%
AF-001	11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued June 8, 2019 (PSD Avoidance Limit)	3.B.11	NO _x	17.64 lb/hr and 77.26 tpy
			CO	21.60 lb/hr and 94.61 tpy
AC-001 AF-008 AG-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE	3.B.12	Hours	2,500 hours per year of specialty coating use
AD-001 AD-002 AD-007 AD-008 AD-009 AE-001 AE-002 AE-003 AE-007 AE-008 AE-009 AE-010 AE-011 AE-018 AE-019 AE-020 AE-021 AE-022	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a), CAM	3.B.13	PM (filterable only)	CAM Applicability
AI-001 AI-002	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.B.14	PM (filterable only)	0.6 lb/MMBtu
AI-001	40 CFR 63, Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) 40 CFR 63.6580, 63.6585, and 63.6590(a)(2)(iii) and (c)(1), Subpart ZZZZ	3.B.15	HAP	Applicability

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AI-001	40 CFR 60, Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII	3.B.16	NMHC+NO _x , PM (filterable only), CO, SO ₂	Applicability
	40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, Subpart IIII and 40 CFR Part 1039, Appendix I and 40 CFR 1039.105	3.B.17	NMHC+NO _x CO PM (filterable only) Opacity	4.7 g/kW-hr 5.0 g/kW-hr 0.40 g/kW-hr Limits for acceleration and lugging modes. See condition.
AI-001	40 CFR 60.4207(b), Subpart IIII and 40 CFR 1090.305	3.B.18	SO ₂ (Diesel Fuel Requirements)	Max sulfur content of diesel fuel ≤15 ppm Min. cetane index of 40 or max aromatic content of 35 volume percent.
	40 CFR 60.4211(a)(1)-(3) and (c), Subpart IIII	3.B.19	NMHC+NO _x , PM (filterable only), CO, SO ₂	Certified engine requirements
	40 CFR 60.4211(f)(1)-(3), Subpart IIII	3.B.20		Operating requirements

3.B.1 For the entire facility, the permittee shall limit the emissions of Volatile Organic Compounds (VOC) to no more than 240 tons per year (tpy), as determined for each consecutive, rolling 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 15, 2019)

3.B.2 For the entire facility, the permittee shall limit the emissions of Hazardous Air Pollutants (HAPs) to no more than 24.0 tpy of total HAPs and 9.0 tpy of any individual HAP, as determined for each consecutive, rolling 12-month period.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 15, 2019 [MACT Avoidance Limit])

3.B.3 For the entire facility, 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 associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship: $E = 4.1p^{0.67}$, where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

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

- 3.B.4 For the entire facility, the permittee shall operate all pollution control equipment at all times when the respective process/equipment is in operation. In the event of a failure of the pollution control equipment, the permittee shall cease operation of the respective process/equipment until such time as repairs are made and the proper efficiency of the pollution control equipment is restored.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 23, 2007 [PSD Avoidance Limit])

- 3.B.5 The facility is subject to and shall comply with all the applicable requirements of 40 CFR 63, Subpart CCCCCC, the NESHAP for Source Category: Gasoline Dispensing Facilities and the applicable General Provisions in 40 CFR 63, Subpart A, as required by Table 3 to Subpart CCCCCC. The facility has a monthly throughput of less than 10,000 gallons of gasoline and shall comply with the work practice standards found in Condition 3.D.1 of this permit.

(Ref.: 40 CFR 63.11111(a) and (b), 63.11130, and Table 3, Subpart CCCCCC)

- 3.B.6 For Emission Points AB-003, AE-007, AE-008, AE-009, AE-010, AE-011, AF-001, AF-002, and AI-002, the permittee shall only combust pipeline quality natural gas.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued August 23, 2007)

- 3.B.7 For Emission Points AB-003, AE-007, AE-008, AE-009, AE-010, AE-011, AF-001, AF-002, and AI-002, the maximum discharge of sulfur oxides 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.8 For Emission Points AB-003, AE-007, AE-008, AE-009, AE-010, AE-011, AF-001, and AF-002, the maximum permissible emission of ash and/or particulate matter 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.B.9 For Emission Points AE-007, AE-008, AE-009, AE-010, AE-011, the permittee is subject to and shall comply with all applicable requirements of the Standards of Performance for Calciners and Dryers in Mineral Industries (40 CFR Part 60, Subpart UUU).

(Ref.: 40 CFR 60.730, Subpart UUU)

- 3.B.10 For Emission Points AE-007, AE-008, AE-009, AE-010, AE-011, no emissions shall be discharged into the atmosphere that:

- (a) Contain particulate matter in excess of 0.040 grains per dry standard cubic foot (gr/dscf); and
- (b) Exhibit greater than 10 percent opacity.

Because these emission points are considered perlite expansion furnaces that use dry control devices, the furnaces are exempt from the monitoring requirements of 40 CFR 60, Subpart UUU.

(Ref.: 40 CFR 60.732 and 60.734(c), Subpart UUU)

- 3.B.11 For Emission Point AF-001, the permittee shall limit emissions of nitrogen oxides (NO_x) to 17.64 lb/hr and 77.26 tpy and shall limit emissions of carbon monoxide to 21.60 lb/hr and 94.61 tpy.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C., as established in the Title V Operating Permit issued June 8, 2019 [PSD Avoidance Limit])

- 3.B.12 For Emission Points AC-001, AF-008, and AG-003, the permittee shall limit the application of specialty coatings to no more than 2,500 hours per calendar year, combined for all three paint spray booths.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)., as established in the Title V Operating Permit issued DATE)

- 3.B.13 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, the permittee is subject to and shall comply with all applicable requirements of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

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

- 3.B.14 For Emission Points AI-001 and AI-002, the maximum permissible emission of ash and/or particulate matter shall not exceed an emission 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.15 Emission Point AI-001 is subject to and shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ and the applicable General Provisions in 40 CFR 63, Subpart A, as noted in Table 8 to Subpart ZZZZ. Emission Point AI-001 is considered a new, emergency CI stationary RICE at an area source of HAP emissions. As such, the permittee shall comply with Subpart ZZZZ by complying with the applicable requirements of the

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII. No other requirements of Subpart ZZZZ apply.

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

- 3.B.16 Emission Point AI-001 is subject to and shall comply with all applicable requirements of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII and the applicable General Provisions in 40 CFR 60, Subpart A, as required in Table 8 to Subpart IIII.

(Ref.: 40 CFR 60.4200(a)(2)(i), 60.4218, and Table 8 to Subpart IIII)

- 3.B.17 For Emission Point AI-001, the permittee shall operate and maintain the engine such that it achieves the following emission standards for the life of the engine:

- (a) Non-methane hydrocarbon and nitrogen oxides (NMHC + NO_x) \leq 4.7 g/kW-hr
- (b) Carbon monoxide (CO) \leq 5.0 g/kW-hr
- (c) PM \leq 0.40 g/kW-hr
- (d) Opacity shall not exceed:
 - (1) 20 percent during the acceleration mode
 - (2) 15 percent during the lugging mode, and
 - (3) 50 percent during the peaks in either the acceleration or lugging modes

(Ref.: Ref.: 60.4205(b), 60.4202(a)(2), and 60.4206, Subpart IIII and 40 CFR Part 1039, Appendix I and 40 CFR 1039.105)

- 3.B.18 For Emission Point AI-001, the permittee shall use diesel fuel that meets the following per gallon standards:

- (a) Maximum sulfur content of \leq 15 ppm, and
- (b) 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 1039.305)

- 3.B.19 For Emission Point AI-001, the permittee shall comply with the emission standards contained in Condition 3.B.17 by purchasing, installing, operating, and maintaining an engine certified to meet the emission standards. The permittee shall operate and maintain the engine in accordance with the manufacturer's emission-related written instructions

and can only change the emission-related settings that are permitted by the manufacturer. The permittee shall meet the applicable requirements of 40 CFR Part 1068.

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

3.B.20 For Emission Point AI-001, the engine shall be considered an emergency stationary engine under Subpart IIII provided the engine only operates according to the requirements in paragraphs (a) through (c) below. If the permittee does not operate the engine according to the requirements in paragraphs (a) through (c) below, the engine will not be considered an emergency engine under Subpart IIII and must meet all 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 an engine. The permittee may petition the DEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the federal, state, or local standards require maintenance testing of an 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)-(3), Subpart IIII)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb/MMBtu
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lb./MMBtu

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

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

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

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

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Facility-wide	40 CFR 63.11116(a), Subpart CCCCCC	3.D.1	HAP	Minimize gasoline vapor releases

3.D.1 For the entire facility, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- (a) Minimize gasoline spills;
- (b) Clean up spills as expeditiously as practicable;
- (c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
- (d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(Ref.: 40 CFR 63.11116(a), Subpart CCCCCC)

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 terms and conditions contained in this permit (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following information:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

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

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

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

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

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

- (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 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Regulation 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 period (i.e., April 30, July 31, October

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

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

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

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

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

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements (if applicable). All test methods shall be those respective versions (or their equivalents) approved by 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 of this permit, the monitoring, testing, recordkeeping, and reporting requirements specified in Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

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

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
Facility-wide	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).	5.B.1	VOC and HAPs	Record monthly coating and fuel usage and calculate monthly and 12-month rolling total VOC and HAP emissions
		5.B.2	PM (filterable)	Weekly inspections of control equipment
		5.B.3	Fuel	Monitor and maintain records of monthly fuel usage
	40 CFR 63.11111(e) and 63.11116(b), Subpart CCCCCC	5.B.4	HAP	Records documenting monthly gasoline throughput
AE-007 AE-008 AE-009 AE-010 AE-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.5	PM (filterable)	Conduct performance test within 61 months of previous test
			Opacity	Conduct Method 9 VEE concurrently with PM performance test
AF-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(2).	5.B.6	NO _x , CO	Conduct biennial performance test within 25 months of previous test
AC-001 AF-008 AG-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).	5.B.7	Hours	Maintain a record of the hours the specialty coating is used per year
AD-001 AD-002 AD-007 AD-008 AD-009 AE-001 AE-002 AE-003 AE-007 AE-008 AE-009 AE-010 AE-011 AE-018 AE-019 AE-020 AE-021 AE-022	40 CFR 64.3(a) and (b), 64.6(c), CAM	5.B.8	Differential pressure	CAM Requirement: Daily pressure differential measurement (All except AE-001 and AE-002)
		5.B.9	Silo fill level	CAM Requirement: Daily silo fill level measurement (AE-001 and AE-002)
	40 CFR 64.7(b) and (c), CAM	5.B.10	Operation & Maintenance	Operation and maintenance requirements for monitoring system(s)
	40 CFR 64.7(d), CAM	5.B.11	Corrective Action	Corrective Action response to an excursion/exceedance of a CAM indicator
	40 CFR 64.8, CAM	5.B.12	QIP	Upon request by DEQ, develop a Quality Improvement Plan (QIP)
	40 CFR 64.9(b), CAM	5.B.13	CAM Records	Maintain CAM records as specified
AI-001	40 CFR 60.4209(a) and 60.4214(b), Subpart IIII	5.B.14	Hours	Install non-resettable hour meter and record hours of operation
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(a)(3).	5.B.15	Fuel specifications	Maintain records of diesel purchased

- 5.B.1 For the entire facility, in order to demonstrate compliance with Conditions 3.B.1 and 3.B.2, the permittee shall monitor and record the following for each coating and solvent/thinner used and each fuel used:
- (a) The identification and the total gallons of each coating and solvent/thinner used during each calendar month;
 - (b) The density (in lb/gal) of each coating and solvent/thinner used;
 - (c) The VOC and HAP content of each coating and solvent/thinner and a description of the method used to determine the VOC/HAP content (e.g., SDS, environmental data sheet, Method 24 testing, etc.);
 - (d) The monthly usage and type of each fuel combusted;
 - (e) The total VOC emission rate in tons for each calendar month and for each consecutive 12-month period on a rolling basis; and
 - (f) The HAP emission rate of each individual HAP and all combined HAPs in tons for each calendar month and for each consecutive 12-month period on a rolling basis.

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

- 5.B.2 For the entire facility, the permittee shall perform weekly inspections of all pollution control equipment (i.e., baghouse or filter) and perform any required maintenance. The permittee shall maintain on hand at all times sufficient equipment as is necessary to repair the pollution control equipment. The permittee shall maintain a log of each inspection, including the pollution control equipment inspected, date/time of inspection, any maintenance required, and the name of the person performing the inspection. These records shall be made available to DEQ personnel upon request.

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

- 5.B.3 For the entire facility, the permittee shall monitor and record the monthly usage of natural gas. The permittee shall demonstrate that the natural gas is “pipeline quality” by maintaining a copy of a current, valid purchase statement, tariff sheet or transportation contract for the natural gas.

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

- 5.B.4 For the entire facility, the permittee shall keep records to document the monthly throughput (gallons) of gasoline. These records shall be made available for inspection within 24 hours of a request by the DEQ.

(Ref.: 40 CFR 63.11111(e) and 63.11116(b), Subpart CCCCCC)

- 5.B.5 For Emission Points AE-007, AE-008, AE-009, AE-010, and AE-011, the permittee shall demonstrate compliance with the 0.040 gr/dscf PM emission standard by conducting a stack test in accordance with EPA Reference Methods 1-5, 40 CFR 60, Appendix A. The permittee shall complete the stack test for each emission point within 61 months of the previous test. If the previous test was conducted over 61 months ago for a given emission point, the stack test shall be conducted within 18 months of the date the Title V permit is reissued and every 61 months thereafter. The permittee shall operate the source as close to the maximum rated capacity as operating conditions allow during the performance test. If an emission unit does not operate during a given stack test period, the permittee shall conduct a stack test within 90 days of restarting the emission unit.

The permittee shall demonstrate compliance with the 10% opacity standard by completing a visible emissions evaluation (VEE) per EPA Reference Method 9, 40 CFR 60, Appendix A. The observations should be completed concurrently during the required biennial stack tests. If visibility or other conditions prevent the opacity observations from being performed concurrently with the stack testing, the permittee shall reschedule the opacity observations as soon after the stack tests as possible, but no later than thirty (30) days.

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

- 5.B.6 For Emission Point AF-001, the permittee shall demonstrate compliance with the NO_x and CO emission limits in Condition 3.B.11 by conducting a biennial stack test in accordance with EPA Reference Methods 7E and 10, respectively, from 40 CFR 60, Appendix A, or EPA-approved equivalent methods. Subsequent stack tests shall be completed within 25 months of the previous test. The permittee shall operate the source as close to the maximum rated capacity as operating conditions allow during the performance test.

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

- 5.B.7 For Emission Points AC-001, AF-008, and AG-003, the permittee shall maintain a written or electronic log of the hours (combined) that specialty coating was applied in any of the three spray paint booths. The log shall include the date, booth, and time specialty coating use began and ended.

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

- 5.B.8 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, the permittee shall monitor the pressure drop across each baghouse continuously and record the pressure drop daily in accordance with the CAM Plan found in Appendix C of the permit.

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

- 5.B.9 For Emission Points AE-001 and AE-002, the permittee shall monitor the silo level daily in accordance with the CAM Plan found in Appendix C of the permit.

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

- 5.B.10 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, 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.11 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, 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.12 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, based on the results of a determination made under Condition 5.B.11, the DEQ 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 DEQ that a QIP is required. The DEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. 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.13 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.12 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.14 For Emission Point AI-001, the permittee shall install a non-resettable hour meter on the engine, if one is not already installed. The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the hour meter. The permittee shall record the time of operation and the reason the engine was in operation during that time.

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

- 5.B.15 For Emission Point AI-001, the permittee shall maintain records documenting the diesel fuel meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel.

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

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 and HAPs	Monthly and 12-month rolling total VOC and HAP emissions calculations
		5.C.2	Inspection logs	Weekly inspection logs for control equipment
		5.C.3	Natural gas usage	Monthly natural gas usage
		5.C.4	Gasoline throughput	Monthly gasoline throughput
AC-001 AF-008 AG-003	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.5	Hours	Total hours specialty coatings were applied
AE-007 AE-008 AE-009 AE-010 AE-011 AF-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.6	Stack test reports	Submit test protocol, notification of testing date, and test reports
AD-001 AD-002 AD-007 AD-008 AD-009 AE-001 AE-002 AE-003 AE-007 AE-008 AE-009 AE-010 AE-011 AE-018 AE-019 AE-020 AE-021 AE-022	40 CFR 64.9(a), CAM	5.C.7	CAM Reporting	Semiannual reporting requirements
	40 CFR 64.7(e), CAM	5.C.8	CAM Modification	Promptly notify DEQ of failure to achieve limit/standard though no excursion or exceedance was indicated by approved monitoring
AI-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.9	Hours of operation	Annual report summarizing hours of operation in emergency and non-emergency use

5.C.1 For the entire facility, in accordance with Condition 5.A.4, the permittee shall submit a copy of the monthly records and the consecutive 12-month VOC and HAP emissions calculated on a rolling basis, as required by Condition 5.B.1.

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

- 5.C.2 For the entire facility, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 of the weekly inspection logs required by Condition 5.B.2.

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

- 5.C.3 For the entire facility, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 summarizing the monthly natural gas usage recordkeeping required by Condition 5.B.3.

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

- 5.C.4 For the entire facility, the permittee shall submit a semiannual report in accordance with Condition 5.A.4 summarizing the monthly gasoline throughput required by Condition 5.B.4.

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

- 5.C.5 For Emission Points AC-001, AF-008, and AG-003, the permittee shall submit an annual report by January 31st for the previous calendar year summarizing the hours (combined) that a specialty coating was applied in any of the three spray paint booths.

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

- 5.C.6 For Emission Points AE-007, AE-008, AE-009, AE-010, AE-011, and AF-001, the permittee shall comply with the following notification and reporting provisions.

- (a) The permittee shall submit a test protocol at least thirty (30) days prior to the scheduled test date to ensure that all test methods and procedures are acceptable to DEQ. If the initial protocol is acceptable, subsequent protocols may be waived if they do not contain significant changes.
- (b) The DEQ shall be notified at least ten (10) days prior to the scheduled test date so that an observer may be present to witness the test(s).
- (c) The permittee shall submit results from any required stack tests to the DEQ within 60 days of the completion of any stack test required by this permit.
- (d) If an emission unit will not operate during a given stack test period, the permittee shall notify the DEQ in writing prior to the stack test deadline and conduct a stack test within 90 days of restarting the emission unit.

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

5.C.7 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, the permittee shall submit semiannual 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.12. 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.8 For Emission Points AD-001, AD-002, AD-007, AD-008, AD-009, AE-001, AE-002, AE-003, AE-007, AE-008, AE-009, AE-010, AE-011, AE-018, AE-019, AE-020, AE-021, and AE-022, if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

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

5.C.9 For Emission Point AI-001, the permittee shall submit an annual report by January 31st for the previous calendar year summarizing the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

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

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

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

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

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

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

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
EPA	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
MMBtu/hr	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 Part 61; or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMHC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 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 February 22, 2024)

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 June 27, 2024)

40 CFR 60, Subpart A, General Provisions

40 CFR 60, Subpart UUU, Standards of Performance for Calciners and Dryers in Mineral Industries

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

40 CFR 63, Subpart A, General Provisions

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

40 CFR 63, Subpart CCCCCC, NESHAP for Gasoline Dispensing Facilities

40 CFR 64, Compliance Assurance Monitoring

40 CFR 82, Protection of Stratospheric Ozone

APPENDIX C

Compliance Assurance Monitoring Plans

**CAM PLAN FOR EMISSION POINTS AD-001, AD-002, AD-007, AD-008, AD-009,
AE-003, AE-018, AE-019, AE-020, AE-021, AE-022**

	Indicator No. 1
Indicator	Differential Pressure
Measurement Approach	Record differential pressure across dust collector in inches of water
Indicator Range	An excursion is defined as 8 inches of water or higher. An excursion triggers ceasing throughput at the respective emission source and placing the dust collector in the cleaning cycle and/or shutting down the unit for inspection and maintenance.
Data Collection Frequency	Pressure differential is monitored continuously and recorded daily.
Averaging Period	None (i.e., instantaneous)
Recordkeeping	Pressure differential is recorded in a log daily. Logs may be maintained in written or electronic format
QA/QC	Pressure gauges are calibrated annually.

CAM PLAN FOR EMISSION POINTS AE-001 AND AE-002

	Indicator No. 1
Indicator	Silo Level
Measurement Approach	Manually measure and record silo level in feet
Indicator Range	An excursion is defined as < 3 feet of clearance from the topside. Unloading shall not commence if < 3 feet of clearance would remain. Unloading will be discontinued if clearance levels drop below 3 feet.
Data Collection Frequency	Daily, prior to loading
Averaging Period	None (i.e., instantaneous)
Recordkeeping	Clearance level is recorded in a log on a daily basis. Logs may be maintained in written or electronic format
QA/QC	NA

CAM PLAN FOR EMISSION POINTS AE-007, AE-008, AE-009, AE-010, AE-011

	Indicator No. 1
Indicator	Differential Pressure
Measurement Approach	Record differential pressure across dust collector in inches of water
Indicator Range	An excursion is defined as 8 inches of water or higher. An excursion triggers ceasing throughput at the respective emission source and placing the dust collector in the cleaning cycle and/or shutting down the unit for inspection and maintenance.
Data Collection Frequency	Pressure differential is monitored continuously and recorded daily.
Averaging Period	None (i.e., instantaneous)
Recordkeeping	Pressure differential is recorded in a log daily. Logs may be maintained in written or electronic format
QA/QC	Pressure gauges are calibrated annually.